

TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 78

**TOWN AND COUNTRY PLANNING APPEALS (INQUIRIES PROCEDURE)
(ENGLAND) RULES 2000**

STATEMENT OF CASE OF LOCAL PLANNING AUTHORITY

Appellant: Starbones Ltd

Proposed development: Planning application

“Redevelopment of 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), basement car and bicycle parking, resident amenities and hard and soft landscaping with all necessary ancillary and enabling works”

Advertisement consent application

“Erection of three internally illuminated fascia signs to proposed building”

Site: Land at Chiswick Roundabout, Great West Road,
Chiswick, London W4

Planning Inspectorate references: APP/F5540/W/17/3180962 &
APP/F5540/Z/17/3173208

LPA references: 00505/EY/P18 & 00505/EY/AD22

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1.0 Introduction

1.1 The appeals are made by Starbones Limited in respect of the Local Planning Authority's refusal of applications for planning permission and advertisement consent, as listed respectively below, for development at Chiswick Roundabout.

(A) Planning application (ref. 00505/EY/P18)

“Redevelopment of 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), basement car and bicycle parking, resident amenities and hard and soft landscaping with all necessary ancillary and enabling works”

(B) Advertisement consent application (ref. 00505/EY/AD22)

“Erection of three internally illuminated fascia signs to proposed building”

1.2 Both applications were refused by the Local Planning Authority on 9 February 2017. It has been agreed that the appeals against refusal of the applications will be considered jointly at a Public Inquiry.

1.3 This Statement of Case will set out the Local Planning Authority's reasons for refusal of the applications. This statement provides details of the appeal site and surrounds, relevant planning history, the planning framework, the main planning considerations for the appeal, and relevant documents that may be relied on in evidence.

1.4 A number of the above details regarding the site description, planning history, planning framework and relevant documents are likely to be agreed in a Statement of Common Ground to follow.

2.0 Appeal Site and Surroundings

- 2.1 The site has an area of 0.28ha. Chiswick Roundabout is to the south, Gunnersbury Avenue (North Circular Road) is to the east, Larch Drive is to the north and Great West Road (A4) and the elevated M4 are to the west. It is currently vacant and hoarded, but for 3 large illuminated advertisements around the site.
- 2.2 The site is within an Archaeological Priority Area but has no other policy designations. The site is located within an area along the Great West Road (A4)/ M4 motorway that is described as the Great West Corridor, which the Hounslow Local Plan identifies as having capacity for change and growth in homes and jobs with new infrastructure over the plan period. This same area is identified in the London Plan as a Strategic Outer London Development Centre and in Hounslow's Local Plan as a potential Opportunity Area.
- 2.3 The built environment around the site includes B&Q and its car park to the north on the other side of Larch Drive, Power Road Industrial Estate on the opposite side of Gunnersbury Avenue, to the east, which includes car dealerships, offices and other light industrial uses. To the west is a petrol station and offices with car dealerships and Brentford Fountain Leisure Centre beyond them. To the south and southeast, on the other side of the roundabout are residential localities of high townscape value and much of the area is designated within either Wellesley Road or Strand on the Green Conservation Areas, the riverside along the Thames containing many listed buildings.
- 2.4 The surrounding locality has numerous heritage assets including Grade I, II* and II listed buildings, Conservation Areas, and Grade I and II* Registered Parks and Gardens. The Royal Botanic Gardens World Heritage Site at Kew is on the opposite side of the Thames. The registered

landscapes at Gunnersbury and Chiswick Parks and Duke's Meadow are designated as Metropolitan Open Land.

- 2.5 Kew Bridge Railway Station is around 550m to the southwest of the site and Gunnersbury station is around 700m to the east of it. The site has a Public Transport Accessibility Level (PTAL) of 4 (good).

3.0 Site Planning History

3.1 There is an extensive planning history for the site. The planning history for the appeal site is as follows:

Applications for planning permission	
00505/EY/P1	Erection of a 26 storey office building Withdrawn: 09th September 2000
00505/EY/P2	Erection of a 13 storey building comprising office building with basement car parking (Tricorn) Refused: 05th May 2001
00505/EY/P3	Redevelopment of site for 13 storey office building (Outline application). Approved: 09th January 2002
00505/EY/P4	Redevelopment of site for offices Refused: 18th April 2002
00505/EY/P5	Erection of 13 storey building comprising office building with basement car parking (Outline Application) Approved: 09th September 2002
00505/EY/P6	Erection of advertising tower.

	Appeal Allowed: 07th November 2003
00505/EY/P7	<p>Redevelopment of site to erect a 15 storey building comprising four levels of underground car parking, show room and retail on ground and mezzanine floors with service area on side and a mixture of 222 one bedroom flats and 42 two bedroom flats on upper floors (levels two to fifteen) and plant room on the roof.</p> <p>Refused: 20th July 2004</p>
00505/EY/P9	<p>Erection of a 5 storey office building comprising office / showroom at ground level and 9 illuminated panels projecting from the sides and roof of the proposed building</p> <p>Appeal dismissed: 19th September 2006</p>
00505/EY/P10	<p>Retention of free standing advertisement tower</p> <p>Appeal dismissed: 06th March 2008</p>
00505/EY/P11	<p>Retention of advertising tower with additional cladding for a temporary period of 2 years.</p> <p>Appeal dismissed: 11th May 2009</p>
00505/EY/P12	<p>Erection of an advertising tower consisting of a V-shaped panel mounted on a 20m pole</p>

	Appeal dismissed: 11th May 2009
00505/EY/P13	Erection of a 5 storey 52m high 'Landmark Building' for office use incorporating 5 media screens and associated parking. Refused: 23rd April 2010
00505/EY/P14	Erection of a landmark office building (B1 use) comprising of retail showroom at ground floor, with 8 office floors above and basement car park providing 6,606sqm total floorspace and incorporating 4 media advertising screens with LED shroud Approved: 24th September 2012
00505/EY/P15	Erection of a temporary advertisement tower structure for the display of a backlit illuminated advertisement panel Appeal allowed: 09th December 2011
00505/EY/P16	Erection of temporary advertisement tower structure and display of backlit illuminated advertisement panel Approved: 02nd November 2011
00505/EY/P17	Erection of temporary advertisement structure to house temporary display of four banner style illuminated advertisements. Advert applications: Erection of temporary advertisement structure and

	<p>temporary display of four banner style illuminated advertisements</p> <p>Withdrawn: 18th July 2013</p>
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Applications for Advertisement Consent	
00505/EK/AD1	<p>Retention of 2 internally illuminated 48 sheet advertisements affixed to tower</p> <p>Appeal allowed: 07th November 2003</p>
00505/EY/AD1	<p>Retention of advertisement hoardings (A4 level)</p> <p>Approved: 10th September 2002</p>
00505/EY/AD2	<p>Retention of illuminated static advertisement hoardings (A4 level)</p> <p>Appeal allowed: 07th November 2003</p>
00505/EY/AD3	<p>Installation of 7 internally illuminated LED screens for advertisements</p> <p>Refused: 16th September 2005</p>
00505/EY/AD4	<p>Installation of seven internally illuminated LED screens for advertisements</p> <p>Appeal dismissed 19 September 2006</p>

00505/EY/AD5	<p>Retention of advertisements</p> <p>Appeal A</p> <p>Appeal dismissed: 06th March 2008</p> <p>Appeal B</p> <p>Appeal allowed 06th March 2008</p>
00505/EY/AD6	<p>Retention of 2 x advertisement poster display each 7m x 5m including internal lighting</p> <p>Appeal dismissed 11th May 2009</p>
00505/EY/AD7	<p>Display of 2 internally illuminated adverts 7m x 5m in a V shaped panel mounted on a 20 metre pole</p> <p>Appeal dismissed: 11th May 2009</p>
00505/EY/AD8	<p>Retention of freestanding advertising displaying sequential LED illuminated digital advertisements</p> <p>Approved: 16th July 2009</p>
00505/EY/AD9	<p>Erection of five LED advertising screens to proposed buildings</p> <p>Appeal allowed: 24th November 2010</p>
00505/EY/AD10	<p>Retention of a freestanding advert display, displaying sequential adverts (changing every seven</p>

	seconds) until 6 March 2010 Appeal dismissed: 10th August 2011
00505/EY/AD11	Retention of nine advertisement panels Refused: 17th May 2010
00505/EY/AD12	Retention of nine advertisement panels Appeal allowed: 10th August 2011
00505/EY/AD13	Display of backlit illuminated advertisement panel Appeal allowed: 9th December 2011
00505/EY/AD14	Erection of temporary advertisement tower structure and display of backlit illuminated advertisement panel Approved: 23rd December 2011
00505/EY/AD15	Installation of four internally illuminated advertisement screens incorporated within the elevations of the proposed office development Approved: 11th December 2012
00505/EY/AD16	Erection of temporary advertisement structure and temporary display of four banner style illuminated advertisements

	Withdrawn: 18th July 2013
00505/EY/AD17	Installation of three internally illuminated landscape shaped Hoardings forming part of site screen Approved: 17th October 2013
00505/EY/AD18	Erection of 3 internally illuminated poster panel hoardings Approved: 8th January 2014
00505/EY/AD19	Proposed amendment to condition 9 of 00505/EY/AD18 (which approved the erection of three internally illuminated hoardings and the removal of nine existing poster panel hoardings) dated 8 January 2014 to vary the timing of advertisement changes from not more than once every 30 seconds to not more than once every 20 seconds Approved: 24th March 2014
00505/EY/AD21	Installation of an internally illuminated 8m x 8m temporary advertisement panel for a period of 12 months Appeal allowed: 11th August 2015

3.2 The applications that are the subject of these appeals were refused planning permission and advertisement consent on 9 February 2017 respectively for the following reasons:

(A) Planning application (ref. 00505/EY/P18)

1. *The development, by virtue of its location, scale and design, would cause harm, including substantial harm to a range of designated heritage assets including Royal Botanic Gardens Kew World Heritage Site, a Grade II* listed registered park, listed buildings of all grades, locally listed buildings and conservation areas through harm to their settings. It has not been demonstrated that the substantial harm would be necessary to achieve substantial public benefits that outweigh that loss or that the public benefits of the proposal would outweigh the harm caused. The development is contrary to policies 7.8 (Heritage assets and archaeology), 7.10 (World Heritage Sites), 7.7 (Location and design of tall and large buildings) and 7.4 (Local character) of the London Plan (consolidated with alterations since 2011), policies CC4 (Heritage), CC3 (Tall buildings) and GB1 (Greenbelt and Metropolitan Open Land) of the Hounslow Local Plan (2015) and the aims and objectives of the aims and objectives of the National Planning Policy Framework (2012).*
2. *The development, by virtue of its location, scale, mass and design would not constitute the very highest, outstanding quality of design required for a tall building in this location. It would cause harm to the character of the wider area around the site and the skyline. It would be contrary to policies 7.4 (Local character), 7.6 (Architecture) and 7.7 (Location of tall buildings and large buildings) of the London Plan (consolidated with alterations since 2011), policies CC1 (Context and Character), CC2 (Urban Design and architecture), CC3 (Tall Buildings) and CC5 (Advertisement Panels, Hoardings and Structures) of the*

Hounslow Local Plan (2015) and the aims and objectives of the National Planning Policy Framework (2012).

3. *The development would fail to secure the delivery of an acceptable quantum and tenure mix of affordable housing and would fail to meet the objectives of maximising the delivering of affordable housing and creating mixed and balanced communities, contrary to policies 3.8 (Housing choice), 3.9 (Mixed and balanced communities) 3.11 (Affordable housing targets) and 3.12 (Negotiating affordable housing) of the London Plan (consolidated with alterations since 2011), The Mayor's Housing SPG (2016), Policy SC2 (Maximising the provision of affordable housing) of the Hounslow Local Plan (2015) and the aims and objectives of the National Planning Policy Framework (2012).*
4. *The lack of sufficient on-site amenity space for the proposed flats and the poor access routes towards nearby public amenity space provision would further diminish the quality of accommodation and would conflict with Policy SC5 of the Hounslow Local Plan and the London Plan Housing SPG and the aims and objectives of the National Planning Policy Framework (2012).*
5. *In the absence of a completed legal agreement, the development would fail to mitigate all of its impacts on existing local infrastructure (including for drivers, cyclists and pedestrians) and the environment and would be in conflict with Policy IMP3 (Implementing and monitoring the local plan) of the Hounslow Local Plan (2015).*

(B) Advertisement consent application (ref. 00505/EY/AD22)

1. *The proposed advertisements, by virtue of number, size, , location, design and illuminance would adversely impact on the character and appearance of the area and would result in harm to the residential and visual amenity of neighbouring properties contrary to the National*

Planning Policy Framework and National Planning Practice Guidance and policies CC1 (context and character) and CC5 (Advertisement Panels, Hoardings and Structures). They would also cause harm to the quality and character of the building upon which they would be located, and would conflict with and cause harm to the character and amenity of the area, contrary to Policy CC5 (Advertisement Panels, Hoardings and Structures) of the Hounslow Local Plan 2015.

- 2. The advertisement panels, by virtue of size, location and illumination would have a harmful impact on the setting of nearby heritage assets and would detract from the landscape and visual amenity of the Metropolitan Open Land contrary to the National Planning Policy Framework, National Planning Practice Guidance and policies CC1 (Context and Character), CC4 (Heritage), CC5 (Advertisement Panels, Hoardings and Structures) and GB1 (Green Belt and Metropolitan Open Land) of the Hounslow Local Plan 2015.*

4.0 PLANNING FRAMEWORK

- 4.1 Having regards to sections 70(2) and 79(4) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 this Appeal must be determined in accordance with the Development Plan unless material considerations indicate otherwise. Regard must also be given to local finance considerations.

The National Planning Policy Framework

- 4.2 The National Planning Policy Framework (“NPPF”) came into force on 27 March 2012, and from April 2014 National Planning Practice Guidance (“NPPG”) in the form of an online guidance resource to support the NPPF came into effect. The Local Planning Authority considers that, where pertinent, the NPPF and NPPG are material considerations and as such, they need to be taken into account in decision-making as appropriate.

The Development Plan

- 4.3 The Development Plan for the London Borough of Hounslow comprises the Hounslow Local Plan (September 2015), the West London Waste Plan and the London Plan Consolidated with Alterations since 2011 (March 2016).
- 4.4 The Hounslow Local Plan is undergoing a process of review with this including review of strategic and detailed planning policies relating to the area along the Great West Road corridor in Brentford. This review is to be incorporated in a ‘Great West Corridor Plan’ that will form part of the Development Plan. In addition to this local plan review, which is to be the subject of examination in public, the Council also intends to prepare interim planning guidance for part of the corridor, including for the application site, in the form of the ‘Brentford East Supplementary Planning Document’. Consideration may be given to these documents, with greater weight to be

applied as they advance towards adoption subject to consideration of whether there are unresolved objections to their policies and their consistency with the NPPF.

Conservation Areas

- 4.5 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Listed Buildings

- 4.6 Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

Relevant Policies

4.7 Hounslow Local Plan

- 4.8 The Hounslow Local Plan was adopted on 15 September 2015. Relevant policies include.

- SV1 Great West Corridor Plan
- Spatial Strategy Chiswick
- Spatial Strategy Brentford
- TC1 Town and neighbourhood centre network
- TC2 Ensuring the future vitality of town centres

- TC3 Managing the growth of retail and other main town centre uses
- TC4 Managing uses in town centres
- ED1 Promoting employment growth and development
- ED2 Maintaining the borough's employment land supply
- ED4 Enhancing local skills
- SC1 Housing growth
- SC2 Maximising the provision of affordable housing
- SC3 Meeting the need for a mix of housing type and size
- SC4 Scale and density of new housing development
- SC5 Ensuring suitable internal and external space
- CC1 Context and character
- CC2 Urban design and architecture
- CC3 Tall buildings
- CC4 Heritage
- CC5 Advertisement panels, hoardings and structures
- GB1 Green Belt and Metropolitan Open Land
- GB4 The Green Infrastructure Network
- GB5 Blue Ribbon Network
- GB7 Biodiversity

- GB9 Play space, outdoor sports facilities and burial space
- EQ1 Energy and carbon reduction
- EQ2 Sustainable design and construction
- EQ3 Flood risk and surface water management
- EQ4 Air quality
- EQ5 Noise
- EQ6 Lighting
- EQ7 Sustainable waste management
- EQ8 Contamination
- EC1 Strategic transport connections
- EC2 Developing a sustainable local transport network
- IMP1 Sustainable development
- IMP3 Implementing and monitoring the Local Plan

4.9 London Plan

4.10 The London Plan was published in March 2016 consolidating alterations to the plan made since 2011. Relevant policies include.

- 2.6 Outer London: vision and strategy
- 2.7 Outer London: economy
- 2.8 Outer London: Transport
- 2.16 Strategic Outer London Development Centres

- 3.2 Improving health and addressing health inequalities*
- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality of housing developments
- 3.6 Children and young people's play and informal recreation
- 3.8 Housing choice
- 3.9 Mixed and balanced communities
- 3.10 Definition of affordable housing
- 3.11 Affordable housing targets
- 3.12 Negotiating affordable housing on individual private and mixed use residential schemes
- 4.1 Developing London's economy
- 4.2 Offices
- 4.3 Mixed use development and offices
- 4.12 Improving opportunities for all
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.6 Decentralised energy in development proposals
- 5.7 Renewable energy
- 5.9 Overheating and cooling

- 5.10 Urban greening
- 5.11 Green roofs and development site environs
- 5.12 Flood risk management
- 5.13 Sustainable drainage
- 5.15 Water use and supplies
- 5.21 Contaminated land
- 6.3 Assessing effects of development on transport capacity
- 6.9 Cycling
- 6.10 Walking
- 6.13 Parking
- Parking Addendum
- 7.1 Lifetime neighbourhoods
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local Character
- 7.5 Public realm
- 7.6 Architecture
- 7.7 Location and design of tall buildings
- 7.8 Heritage assets and archaeology
- 7.10 World Heritage Sites

- 7.13 Safety, security and resilience to emergency
- 7.14 Improving air quality
- 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
- 7.18 Protecting open space and addressing deficiency
- 7.29 The River Thames
- 8.2 Planning Obligations
- 8.3 Community Infrastructure Levy

*Omitted from questionnaire, now included as appendix A

4.11 Supplementary Planning Documents and Guidance

4.12 Hounslow Local Plan Supplementary Planning Documents (“SPD”)

- Air Quality SPD 2008

4.13 London Plan Supplementary Planning Guidance (“SPG”)

- Affordable Housing and Viability SPG 2017
- Housing SPG 2016
- Accessible London SPG 2014
- Character and Context SPG 2014
- Shaping Neighbourhoods Play and Informal Recreation SPG 2012
- World Heritage Sites SPG 2012

5.0 Main Planning Issues

5.1 The Local Planning Authority considers the following to be the main issues relating to the appeal against refusal of planning permission:

- a. The effects of the proposed building, on the setting and significance of a range of designated heritage assets including the Royal Botanic Gardens Kew World Heritage Site, a Grade II* listed registered park, listed buildings of all grades, locally listed buildings and conservation areas, and where harmful effects are identified whether such harm is outweighed by the public benefits of the development.
- b. The quality of the design of the proposed building and its effects on the character of the area and skyline.
- c. The amount and mix of affordable housing and whether the proposal maximises the delivery of affordable housing and achieves the objective of creating mixed and balanced communities.
- d. The amount of on-site amenity space for residents and the accessibility to public open space.
- e. Planning obligations that are necessary to make the development acceptable.

5.2 The Local Planning Authority considers the following to be the main issues relating to the appeal against refusal of advertisement consent:

- a. The impact of the advertisements on the character and appearance of the area and on the residential and visual amenity of neighbouring properties.
- b. The effect of the advertisements on the setting of nearby heritage

assets and the the landscape and visual amenity of the Metropolitan Open Land.

5.3. Therefore in respect of the planning refusal the Local Planning Authority will call evidence with regard to the proposed development to demonstrate:

5.4 **(a) In respect of the effects of the proposed building, on the setting and significance of a range of designated heritage assets including the Royal Botanic Gardens Kew World Heritage Site, a Grade II* listed registered park, listed buildings of all grades, locally listed buildings and conservation areas; and where harmful effects are identified whether such harm is outweighed by the public benefits of the development:**

5.5 That owing to its design, the proposed building will be apparent from numerous vantage points including from a large number of designated heritage assets, many of which are of the highest significance, including those of international importance. From many of these vantage points the proposed building would be of a discordant scale, massing, and height that would result in a development that causes harm, including substantial harm, to the significance of various designated heritage assets, as the proposed building would appear unduly out of scale and an incongruous element in the townscape and landscape that forms the setting of the designated assets.

5.6 These harmful effects are not outweighed by the public benefits of the development.

5.7 This would be contrary to policies of the Development Plan and objectives of the National Planning Policy Framework (NPPF).

(b) In respect of the quality of the design of the proposed building and its effects on the character of the area and skyline:

- 5.8 That the character of the wider area, which includes many sensitive locations, would be adversely affected by the scale, mass and design of the proposed building which is not of the highest architectural quality necessary for such a location.
- 5.9 This would be contrary to policies of the Development Plan and objectives of the National Planning Policy Framework (NPPF).
- 5.10 **(c) In respect of the amount and mix of affordable housing and whether the proposal maximises the delivery of affordable housing and achieves the objective of creating mixed and balanced communities:**
- 5.11 That the affordable housing offered fails to provide the maximum reasonable amount of affordable housing of an appropriate mix on the site, and consequently the affordable housing offer would not satisfy the objective of creating mixed and balanced communities. No exceptional circumstances to justify an off-site contribution towards affordable housing as proposed have been demonstrated.
- 5.12 This would be contrary to policies of the Development Plan and objectives of the National Planning Policy Framework (NPPF).
- 5.13 **(d) In respect of the amount of on-site amenity space for residents and the accessibility to public open space:**
- 5.14 The scheme would not provide good amenity space for all occupants and owing to the location of the site adjacent to busy roads and major intersections there is poor accessibility to nearby public open space, with this diminishing the quality of the residential units.
- 5.15 **(e) In respect of planning obligations that are necessary to make the development acceptable:**
- 5.16 That a number of obligations including for the provision of affordable

housing, transport and public realm improvements, preparation and implementation of travel plans, a construction training strategy or contribution towards construction training, and restrictions of residents obtaining parking permits in local Controlled Parking Zones, are necessary to make the development acceptable. These objectives would satisfy the Community Infrastructure Levy tests.

- 5.17 Note that the Council intends to work with the appellant to address this concern by agreeing a satisfactory legal deed prior to the Inquiry.

6.0 Relevant Documents

6.1 The following documents may be produced or referred to at the Inquiry and are available for inspection at the Civic Centre, Lampton Road, Hounslow, during normal office hours:

- a. Hounslow Local Plan and Supplementary Planning Documents;
- b. The London Plan and London Plan Supplementary Planning Guidance;
- c. National Planning Policy Framework and National Planning Practice Guidance
- d. Documents included in the Local Planning Authority's appeal questionnaire.
- e. Documents submitted and correspondence associated with the application and appeal.
- f. Emerging planning policies and guidance ('Great West Corridor Plan' and 'Brentford East Supplementary Planning Document').

6.2 The Council reserves the right to refer to any other document, record, guidance, policy or source of information in the conduct of its case in connection with this appeal, whether it is extant at the date of this statement or emerges subsequently thereto.

Appendix A

London Plan policy 3.2 (Improving health and addressing health inequalities)

Improving health and addressing health inequalities**POLICY 3.2 IMPROVING HEALTH AND ADDRESSING HEALTH INEQUALITIES****Strategic**

- A The Mayor will take account of the potential impact of development proposals on health and health inequalities within London. The Mayor will work in partnership with the NHS in London, boroughs and the voluntary and community sector as appropriate to reduce health inequalities and improve the health of all Londoners, supporting the spatial implications of the Mayor's Health Inequalities Strategy.
- B The Mayor will promote London as a healthy place for all – from homes to neighbourhoods and across the city as a whole – by:
 - a coordinating investment in physical improvements in areas of London that are deprived, physically run-down, and not conducive to good health
 - b coordinating planning and action on the environment, climate change and public health to maximise benefits and engage a wider range of partners in action
 - c promoting a strong and diverse economy providing opportunities for all.
- C The impacts of major development proposals on the health and wellbeing of communities should be considered, for example through the use of Health Impact Assessments (HIA).

Planning decisions

- D New developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities.

LDF Preparation

- E Boroughs should:
 - a work with key partners to identify and address significant health issues facing their area and monitor policies and interventions for their impact on reducing health inequalities
 - b promote the effective management of places that are safe, accessible and encourage social cohesion
 - c integrate planning, transport, housing, environmental and health policies to promote the health and wellbeing of communities
 - d ensure that the health inequalities impact of development is taken into account in light of the Mayor's Best Practice Guidance on Health issues in Planning.

- 3.8 The living environment has a fundamental impact on the health of a population, whether positive or negative. Good housing, employment and a good start in life can all help to reduce health inequalities at the local level; while poor environmental quality, housing conditions or pollution can exacerbate them. Targeted interventions to protect and promote health should help address health inequalities. Where a development or plan is anticipated to have significant implications for people's health and wellbeing, an HIA should be considered to identify opportunities for minimising harms (including unequal impacts) and maximising potential health gains. An HIA can be integrated into Strategic Environmental Assessment, Sustainability Appraisal or Environmental Impact assessment, where these are required. Borough public health teams are a valuable source of support and advice for planning and critically appraising HIAs and it would be helpful to consult with them early in the process. The London Plan will help deliver Objective 5: Healthy Places of the Mayor's Health Inequalities Strategy to ensure new homes and neighbourhoods are planned and designed to promote health and reduce health inequalities.
- 3.9 The planning system can play a key role in promoting health and reducing health inequalities. Health inequalities are distributed across different population groups, are often geographically concentrated, with poor health closely aligned to poverty and deprivation (see Map 1.3 - Index of Deprivation). The Health and Social Care Act 2012 gives boroughs an enhanced role in improving public health in their area through the emerging 'Health and Wellbeing Boards', the Joint Strategic Needs Assessment (JSNA) process and the development and implementation of Joint Health and Wellbeing Strategies⁴⁰. This will provide an opportunity to align strategies and programmes, informing plan-making and development management. The new Public Health Outcomes Framework summarises the new public health responsibilities of boroughs and includes outcomes closely linked to planning including air quality, the use of green space, road casualties and fuel poverty.
- 3.10 The policies in this Plan seek to address the main health issues facing the capital, (including mental health, obesity, cancer, cardio-vascular and respiratory diseases) by seeking to ensure new developments are designed, constructed and managed in ways that improve health and reduce health inequalities (Policy 7.1). The development and regeneration of areas for regeneration (Policy 2.14) and many of the designated opportunity and intensification areas (Policy 2.13) provide the greatest opportunity to improve health and reduce health inequalities.
- 3.10A New development should be supported by necessary and accessible health and social infrastructure. Planning obligations should be secured, and the Community Infrastructure Levy should be used as appropriate to ensure delivery of new facilities and services (policies 3.16-3.19, 8.2 and 8.3), including places for meetings between all members of a community (see policies 3.1 and 7.1). This Plan

⁴⁰ Department of Health, Joint Strategic Needs Assessments and Joint Health and Wellbeing Strategies – statutory guidance. DoH, 2013

also aims to create opportunities for employment and economic development to meet the needs of the community; improve access to green and open spaces and leisure facilities (including using the planning system to secure new provision); support safe and sustainable transport systems (including walking and cycling); reduce road traffic casualties; improve air quality; reducing noise, increase access to healthy foods; create places for children to play; and ensure there is a good range of local services. The principles contained within the Mayor's Best Practice Guidance (BPG) on Health Issues in Planning⁴¹ will inform the health inequalities impact of a development, and are particularly important for Opportunity Area Planning Frameworks (OAPF) and masterplanning. This BPG will be updated to reflect the new policy and changes to the NHS in London and will include a methodology for undertaking HIAs.

- 3.11 Housing has a major impact on the health of residents, and the policies in this Plan are intended to enable Londoners to live in well designed, high quality homes, appropriately sized and energy efficient, warm and dry, safe, providing good access to high quality social infrastructure, green spaces, and limiting disturbance from noise, or exposure to poor air quality. The detailed design of neighbourhoods is also very important for health and well-being (see Chapter 7). This can be complemented by other measures, such as local policies to address concerns over the development of fast food outlets close to schools.⁴² Places can be designed to promote health, for example by providing attractive spaces that promote active lifestyles. The Mayor and boroughs will seek to support the delivery of new and improved facilities for sport, walking, cycling, play and other forms of physical activities, including maximising opportunities associated with the legacy of the 2012 Games.
- 3.12 The voluntary and community sector has an essential role in tackling health inequalities at the local level, particularly in promoting and supporting community involvement.

Housing

- 3.13 The Mayor is clear that London desperately needs more homes in order to promote opportunity and real choice for all Londoners, with a range of tenures that meets their diverse and changing needs and at prices they can afford. To achieve these aims, he is committed to taking effective steps to encourage the provision of new homes through the policies in this Plan (which deal with identifying housing need and capacity to help meet this) and in his London Housing Strategy (which deals, among other things, with detailed questions of investment and delivery for which he has particular responsibility).
- 3.14 With a growing population and more households, delivering more homes for Londoners meeting a range of needs, of high design quality and supported by the

41 Mayor of London. Best Practice Guidance (BPG) on Health Issues in Planning. GLA, 2007

42 Mayor of London. Takeaways Toolkit. GLA, November 2012