

LOCAL PLANNING AUTHORITY REF: 00505/EY/P18

SECTION 78 OF THE TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)

**APPEAL AGAINST THE DECISION OF
THE LONDON BOROUGH OF HOUNSLOW
TO REFUSE PLANNING PERMISSION FOR
THE PROPOSED DEVELOPMENT OF LAND AT
CHISWICK ROUNDABOUT,
GREAT WEST ROAD, CHISWICK, LONDON W4**

**STATEMENT OF CASE ON BEHALF OF THE APPELLANT
STARBONES LTD**

25 JULY 2017

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1.0 INTRODUCTION

- 1.1 On 21st December 2015, Starbones Limited (the “**Appellant**”) submitted applications for full planning permission and advertisement consent to the London Borough of Hounslow (“**LBH**”) to permit the development of land at Chiswick Roundabout (the “**Site**”). A plan showing the location and extent of the Site has been provided with this Statement.
- 1.2 The description of development for the planning application (ref: 00505/EY/P18) is: *“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”* (the “**Proposed Development**”).
- 1.3 The application for advertisement consent (ref: 00505/EY/AD22) is for the following development: *“Erection of three internally illuminated fascia signs to proposed building”* (the “**Advertisement Proposal**”).
- 1.4 The original details of the Proposed Development were amended slightly during the determination period (the number of residential units increased from 320 to 327 and some design changes were made in response to comments received from the GLA). Further information was therefore submitted to LBH to show the proposed changes in October 2016.
- 1.5 Both applications were considered together by the LBH Planning Committee on 12 January 2017 with an officer recommendation for refusal. At the Committee, members resolved to refuse both applications in line with the officer recommendation. The decision notices were both issued on 9 February 2017.
- 1.6 LBH gave five reasons for refusal of the Proposed Development, which broadly relate to the following issues (please refer to the decision notice for the actual text of the reasons):
- 1) The degree of harm caused to designated heritage assets and whether such harm is outweighed by the public benefits of the Proposed Development;
 - 2) Design quality;
 - 3) The quantum and tenure mix of the proposed affordable housing;
 - 4) The quantum of on-site amenity space for the residents and the quality of the access routes towards nearby public amenity space; and
 - 5) The lack of a completed S106 legal agreement.

- 1.7 Two reasons for refusal of the Advertisement Proposal were provided by LBH (again please refer to the decision notice for the text of the reasons):
- 1) The impact on the character and appearance of the area and on the residential and visual amenity of neighbouring properties; and
 - 2) The impact on the setting of nearby heritage assets and the landscape and visual amenity of the Metropolitan Open Land.
- 1.8 Due to the statutory timeframe for appeal of advertisement decisions, an appeal against the refusal of the Advertisement Proposal was submitted on 5 April 2017 (ref: APP/F5540/Z/17/3173208). It was agreed with the Planning Inspectorate on 2 June 2017 that the processing of this advertisement appeal would be held in abeyance to be determined alongside the appeal for the Proposed Development, given the degree of interest and the intrinsic link between the two proposals.
- 1.9 The Statement of Case submitted in respect of the Advertisement Proposal sets out the Appellant's case for that appeal and should be read alongside this Statement of Case. The two Statements together comprise the Appellant's complete case.
- 1.10 A conjoined public inquiry to consider the reasons for refusal of both the Proposed Development and the Advertisement Proposal is requested. Justification of this approach is provided within the main body of this Statement.
- 1.11 The purpose of this Statement of Case is to set out the Appellant's case against the refusal of planning permission for the Proposed Development. It will therefore respond to the reasons for refusal set out in LBH's decision notice and highlight any other issues considered relevant for the Appellant's case.

2.0 SITE AND SURROUNDING AREA

- 2.1 The Site comprises 0.28 Ha fronting onto the Chiswick Roundabout, which is the confluence of the Great West Road (A4), North and South Circular Roads (A406), Chiswick High Road and the M4 Flyover. The Site sits within Gunnersbury ward and comprises vacant brownfield land, comprising three advertisement hoardings which are located on each corner of the Site.
- 2.2 The Site contains no listed buildings and is not located within a Conservation Area. The front boundary of the Site, fronting Chiswick Roundabout, is located within an Archaeological Priority Area, but the remainder of the Site is not subject to any policy designations.
- 2.3 Within close proximity to the Site, the Gunnersbury Park Conservation Area is located to the north; the Thorney Hedge Conservation Area lies to the east; and the Wellesley Road Conservation Area sits south of the Site on the opposite side of the Chiswick Roundabout. Chiswick roundabout itself is a large area of public realm with significant soft landscaping and tree coverage. The Royal Botanic Gardens, Kew (a UNESCO World Heritage Site) is located further to the south, across the River Thames.
- 2.4 The Site is located within Hounslow's Golden Mile, a recognised regeneration area (identified in Hounslow's Local Plan as a potential Opportunity Area). The Golden Mile is a stretch of the A4/Great West Road that runs from the Chiswick Roundabout in the east, 2.5 miles to Gillette Corner in the west, and forms an important strategic corridor into Central London from Heathrow Airport. The Golden Mile also forms part of the Great West Corridor, identified in the London Plan as a potential Strategic Outer London Development Centre.
- 2.5 The Appellant will provide further details of the planning history of the Site in its evidence for the appeal, in particular:
1. LPA ref: 00505/EY/P1 – *The Pinnacle*. LBH resolved to grant consent in January 2000, but the application was withdrawn after being called in for determination by the Secretary of State. The application was for a 26 storey (119m) building comprising office accommodation and a restaurant for public use.
 2. LPA ref: 00505/EY/P5 – *The Citadel*. Planning permission was granted in September 2002 for a 13 storey (59m) building known as the Citadel, comprising 19,750sqm of office with basement level car parking for 140 cars. The permission has been implemented.

3. LPA ref: 00505/EY/P14 – *The Octopus*. Planning permission and advertisement consent were granted for a 10 storey building (50m) in September 2012 and December 2012 respectively, comprising office, retail and outdoor advertising uses. The design was very unusual, with LED advertisement hoarding comprising the building’s façade. These permissions lapsed in October 2015.

2.6 The Appellant will also refer to other planning permissions, applications and emerging proposals in the wider area, including:

1. LPA ref: 00248/U/P7 – *Wheatstone House*. Wheatstone House is located adjacent to Chiswick Roundabout, to the west of the M4 motorway, less than 100m from the Site. This application (to provide a ground plus eight storey 464sqm of commercial floorspace and 95 apartments with associated car parking and amenity space) was refused by LBH on 24 March 2014, but permitted on appeal on 16 March 2015.
2. LPA ref: 00703/A/P11 – *Brentford Football Club*. Planning permission dated 12 June 2014 for the erection of a stadium with ancillary accommodation along with outline permission for the demolition of all existing buildings and erection of enabling development (up to 910 residential units up to ground plus 16 storeys in height, 1,200sqm retail/other floorspace, and a hotel of up to 160 bedrooms).
3. LPA ref: 00535/250/P13 - *250 Gunnersbury Avenue*. Planning permission dated 16 May 2017 for an 8 storey building with flexible office (Class B1(a)) and retail (Class A1) floorspace.

2.7 The development potential of Chiswick Roundabout and its environs presents a great opportunity for LBH to secure widespread regeneration of this area and the formation of an important cluster of activity within the Golden Mile, the London Borough of Hounslow, and within Greater London.

3.0 THE PROPOSED DEVELOPMENT

3.1 The Proposed Development comprises a single building of a total gross internal area of 40,445sqm (GIA) and a maximum height of ground plus 31 storeys (120m AOD) plus two basement levels.

3.2 The scheme has been designed as three defined and sculpted volumes. The volume on the east of the Site is the largest in terms of mass, extending to ground plus 31 storeys, stepped back on the 19th and 29th floors to provide external terraces. The volume on the west of the Site extends to ground plus 24 storeys in height and is stepped back at the 14th floor to provide a terrace. The two volumes are abridged at the 17th floor by a third volume on the northern facade.

3.3 The first six floors (ground plus five storeys) comprise office, retail/café and amenity space; the 6th floor upwards would be residential. The basement levels provide car, motorcycle and cycle parking, space for refuse, plant, switchrooms and substations.

3.4 An internal play area (449sqm) is provided on the 5th floor, event spaces on the 1st and 2nd floor and a large public atrium on the ground floor. Communal external amenity spaces are located on the 5th, 25th and 32nd floors. The amenity area on level 32 will be available as a publicly accessible viewing platform, the detail of which will be secured within the Section 106 agreement. Private amenity space will also be provided in the form of internal winter gardens within each of the residential units.

3.5 In total the Proposed Development, following the amendments made through the regulation 22 submission, comprises the following floorspace:

Proposed floorspace by use	GEA (sqm)	GIA (sqm)
Office (B1)	5,820	5,582
Residential (C3)	36,323	34,376
Retail / Café (A1/A3)	516	487
TOTAL	42,659	40,445

3.6 As part of its evidence, the Appellant will provide a presentation of the Proposed Development (including the Advertising Proposal) giving all parties an overview of the scale, layout, appearance, material, mix of uses, the level and mix of affordable housing, communal areas, public realm, access, parking and servicing.

The Appellant will demonstrate that the proposals constitute sustainable development.

- 3.7 The Appellant will present design, townscape and heritage evidence to demonstrate that the proposals are of the highest architectural quality, meet all relevant housing and design standards, and have been carefully designed to optimise the potential of the building in design and land use terms.
- 3.8 The Appellant will present evidence to describe in detail the significant public benefits that the Proposed Development would provide, including but not limited to: securing a high-quality landmark building for this key gateway site with strong sustainability credentials; the delivery of new housing (including affordable housing); high quality office provision and affordable workspace; landscaping and public realm enhancements; and the provision of a public atrium and viewing gallery. The full benefits associated with the Proposed Development will be set out in the Proofs of Evidence supporting the Appellant's case.

4.0 PLANNING POLICY

- 4.1 LBH's reasons for refusal contain reference to the key planning policies that will be referred in the Appellant's evidence, although the Appellant reserves the right to refer to additional policies as may be relevant.
- 4.2 The Appellant will respond to these reasons in its evidence and in so doing will demonstrate that the Proposed Development and the Advertisement Proposal accord with the Development Plan (comprising the London Plan and the Hounslow Local Plan), as well as any relevant national planning policies and supplementary planning documents.
- 4.3 The Site is located within the Great West Corridor, which is designated as a potential Opportunity Area in the London Plan. LBH is currently working on a Local Plan review for the Great West Corridor, which will set out policies and guidance for development in this area over the next 15 years. As yet there is no publicly available draft of this review – the only published document is the Issues Consultation, which was published in December 2015.
- 4.4 Notwithstanding this emerging policy, the Appellant will demonstrate that the Development Plan provides an appropriate basis for determining the applications.

5.0 THE APPELLANT'S CASE - THE PROPOSED DEVELOPMENT

5.1 The Appellant will respond to the reasons for refusal in respect of the Proposed Development as follows:

Reason for Refusal 1 – alleged harm to heritage assets

5.2 The Appellant will present design, townscape and heritage evidence which will consider the significance of designated and undesignated heritage assets and their settings in the vicinity of the proposals, and will demonstrate that the Proposed Development will not cause substantial harm to or total loss of significance of any designated heritage asset.

5.3 The Appellant will refer to Chapter 12 of the NPPF. It will also refer to the GLA's assessment of the Proposed Development (set out in its Stage 2 Report issued on 6 February 2017). Key cases in which the Courts have considered the assessment of substantial harm to significance of heritage assets will be referred to, in particular *Bedford Borough Council v Secretary of State for Communities and Local Government* [2013] EWHC 2847 (Admin) and *East Northamptonshire District Council v Secretary of State for Communities and Local Government and Barnwell Manor* [2014] EWCA Civ 137 [2015] 1 WLR 45.

5.4 Should the Inspector or other parties take the view that the Proposed Development would cause some harm to heritage assets, the Appellant will demonstrate that the proposals are of an exceptional quality, both in terms of design and the public benefits that they will secure, which would outweigh any harm to the significance of any designated heritage asset.

Reason for Refusal 2 - design

5.5 The design of the Proposed Development is the work of architects Studio Egret West, a highly-acclaimed practice which has recently been nominated for the Stirling Prize, and has designed schemes such as Millharbour Village in Canary Wharf, the Old Vinyl Factory in Hayes, and the refurbishment of the Grade II* listed Balfron Tower.

5.6 The Appellant will present design and architectural evidence to demonstrate that the Proposed Development is of outstanding quality of design. The design is the product of considerable evolution, incorporating advice and feedback from a wide range of consultees. The sculpted form, textured finish and colouration has been derived from a study of the context, creating visual interest as the view changes, with the colouration reflecting the variety of the local palette.

Reason for Refusal 3 – affordable housing

- 5.7 The original affordable housing offer associated with the Proposed Development, submitted in December 2015, comprised 96 intermediate units (or 30%) of the 320 units then proposed. Following discussions with LBH, this offer was amended during the determination period to provide 52 intermediate units on the Site and a £10.5m commuted sum. The commuted sum was calculated on the basis that it could be used by LBH to deliver 79 affordable rent units off-site (assuming that the Council provided the land). This therefore provided more affordable housing units in total, but less on the Site than the original proposal.
- 5.8 The Mayor of London’s Draft Affordable Housing and Viability SPG was published at the end of November 2016, too late in the determination period to influence the Appellant’s affordable housing proposal for the Proposed Development. As a result of this change of policy approach, and given that the affordable housing proposal was a reason for the refusal of the application, the Appellant is now liaising with LBH to agree a revised approach that more closely aligns with the draft guidance.
- 5.9 The Appellant will, in line with advice in the NPPF, Planning Practice Guidance and emerging Mayoral SPG, negotiate a revised affordable housing offer that will reflect up to date circumstances, values, costs and policies.
- 5.10 It is hoped that this will be agreed by LBH in advance of the inquiry such that this reason for refusal will no longer be in contention. If this is not the case, the Appellant will present updated viability evidence demonstrating that the Proposed Development would deliver more than the maximum reasonable amount of affordable housing. This commitment reflects a long term view on the part of the Appellant and is an important public benefit that should carry significant weight in the planning balance.

Reason for Refusal 4 – amenity space

- 5.11 The Proposed Development offers significant improvements to the landscape and public realm in and surrounding the Site, seeking to strengthen the pedestrian connections to and from the Site, sculpt a new public space at the heart of the building, provide play opportunities, extend and improve the existing cycle network and provide sustainable landscaping. Much of this would be secured by a Section 278 highways agreement and/or by the S106 Agreement.
- 5.12 The Proposed Development has a deficit of 6,800sqm of on-site communal external amenity space compared to the benchmark external space standards proposed in Policy SC5 of the Hounslow Local Plan. The Appellant will demonstrate in its evidence that, given the constraints of the Site area, it is

unrealistic to accommodate this level of external amenity space and this is therefore an “exceptional design consideration” as envisaged by the policy.

- 5.13 The Proposed Development is compliant with the GLA’s amenity space standards as established in the 2016 Housing SPG; and the communal external amenity space provided (on the 5th, 25th and 32nd floors) is of high quality. 752sqm of play space is being provided, more than double the level required by policy, but provided to address the needs of the proposed family units.

Reason for Refusal 5 – Section 106 Agreement

- 5.14 High level heads of terms were provided by the Appellant within the planning application for the Proposed Development, but a draft Section 106 Agreement was not progressed during the determination period for the applications.
- 5.15 In advance of the appeal being heard, the Appellant will liaise with LBH to agree a Section 106 Agreement to include, inter alia: the provision of affordable housing; public realm improvements; improved pedestrian connections to and from the Site; improvements to the existing cycle network; and other transport improvements.
- 5.16 In the specific circumstances of this case (particularly given the need to revise the affordable housing offer – see above) a draft Section 106 Agreement prepared by the Appellant would not assist at this stage. The intention of the Appellant is to have a Section 106 Agreement, based on LBH’s proforma document, in final form in advance of the inquiry.
- 5.17 A session looking at the planning obligations should be included within the timetable such that the Inspector can ask any questions and any changes that may be required can be made during the appeal process. The agreement would be completed within an agreed timeframe following the close of the inquiry.
- 5.18 Appropriate conditions to be attached to a planning permission and advertisement consent will also be agreed between the main parties.

Summary

- 5.19 The Appellant will demonstrate that the proposals are for sustainable development, in accordance with the Development Plan, and attract a strong presumption in favour of development. It will provide evidence to refute the reasons for refusal and make its case for why planning permission should be granted for the Proposed Development.

5.20 Please refer to the separate Statement of Case submitted in respect of the Advertisement Proposal.

6.0 THE APPEAL PROCEDURE

6.1 The Appellant considers a public inquiry to be the most appropriate procedure for the appeal for the following reasons:

- The evidence submitted, particularly in relation to heritage, townscape and design matters, is likely to be complicated and would be best tested by formal questioning and cross examination;
- The evidence relating to heritage, townscape and design in particular is largely visual and an Inspector would benefit from a verbal, descriptive and analytical account;
- The complexity of the case warrants an Inquiry and would allow the Inspector to seek clarification from the relevant experts where required; and
- There is significant public interest in the scheme and an Inquiry would allow all interested parties to hear the evidence and provide representations.

6.2 PINS has confirmed that the two appeals should be considered jointly, which is supported by the Appellant on the basis that many of the issues are interconnected.

6.3 The Appellant currently intends to call five witnesses to support its case covering the following topics:

- Architecture (one witness is likely to produce evidence regarding the context of the Proposed Development and another will provide evidence more specific to the design and evolution of the scheme);
- Planning;
- Townscape and Heritage; and
- Affordable Housing (if required).

The Appellant reserves the right to call other expert evidence as required.

6.4 At this stage, the Appellant considers that the inquiry is likely to last 12 sitting days (i.e. 3 weeks). This provides time for the Appellant and LBH to give their evidence as well as sufficient time for any interested parties. It also allows time for a session considering planning conditions and obligations and a site visit. It is anticipated that the inquiry is unlikely to start before February 2018.

- 6.5 Given the anticipated length of the inquiry, the Appellant is of the view that a bespoke timetable will be agreed between the parties and a Pre-Inquiry Meeting will be required once an Inspector has been allocated.
- 6.6 It is currently assumed that the inquiry venue will be the Hounslow Civic Centre, but discussions on the most suitable venue, likely inquiry dates, etc. will follow submission of the appeal.

7.0 CONCLUSIONS

7.1 The Appellant's evidence will respond to the reasons for refusal provided by LBH and, in so doing, will demonstrate that:

- The Proposed Development complies with appropriate national planning policy objectives.
- The Proposed Development accords with the relevant aspects of the regional and local planning policy framework.
- The Proposed Development is of the highest standard of design and architectural quality, and is appropriate in this key gateway location.
- Even if the Inspector was minded to disagree with the Appellant and conclude that the Proposed Development would cause harm to a designated heritage asset, it would constitute 'less than substantial harm' and be outweighed by the important public benefits that the proposals deliver.
- The Proposed Development will deliver a significant number of high quality homes, which will contribute towards a pressing national, London wide and local need for more, and better quality homes.
- The Proposed Development will deliver affordable housing that is more than the maximum reasonable amount that the Proposed Development can be expected to provide having regard to viability appraisals.
- Appropriate planning conditions will be agreed with LBH in advance of the appeal to ensure that if the Proposed Development were to be permitted it would be acceptable in planning terms.
- Mitigation for impact on local infrastructure, and securing the affordable housing, will be delivered through a Section 106 Agreement, which will be progressed in advance of the appeal being heard.
- The Proposed Development includes a wide range of other public benefits, which carry significant weight in the planning balance.
- The proposed advertising panels are consistent with the character of the area. The principle of advertising in this location is well established and the Advertisement Proposal would not adversely impact on the character of the area, local amenity, or any designated heritage asset.

- 7.2 The relationship between the two appeals will be considered and explored in evidence as necessary.
- 7.3 The Appellant will conclude that in all the circumstances, planning permission and advertisement consent should be granted for the redevelopment of the Site.

APPENDIX 1 - ESSENTIAL SUPPORTING DOCUMENTS PROVIDED WITH THE APPELLANT'S ONLINE APPEAL SUBMISSION

1. Application forms submitted to LBH in December 2015 and October 2016.
2. Decision notices dated 9 February 2017 for the Proposed Development and the Advertisement Proposal
3. Site Plan
4. Statement of Case
5. Draft Statement of Common Ground
6. List of complete planning application materials (as set out at Appendix 2) that will be provided to PINS by way of a complete hard copy set rather than electronic submission¹.

¹ Should an electronic version of the application materials also be required, please do let the Appellant's agent know as soon as possible so that we can arrange within the appeal deadline. It is intended that an inquiry website will be available in due course such that all parties have electronic access to all relevant documents.

APPENDIX 2 – ESSENTIAL SUPPORTING DOCUMENTS PROVIDED TO PINS BY POST – PLANNING APPLICATION MATERIALS INCLUDING DRAWINGS

A. Planning application submitted to LBH on 21 December 2015

1. Planning application forms (including site ownership certificate) for the Proposed Development and the Advertisement Proposal;
2. CIL Additional Information Form;
3. Covering letter, prepared by DP9 Ltd;
4. Design and Access Statement, including Waste, prepared by Studio Egret West and Peter Brett Associates;
5. Planning Statement, prepared by DP9 Ltd;
6. Transport Assessment, Residential Travel Plan and Framework Workplace Travel Plan prepared by Cole Easdon;
7. Sustainability Statement prepared by XCO2;
8. Energy Statement prepared by XCO2;
9. Preliminary Ecological Appraisal prepared by Aspect Ecology;
10. Statement of Community Involvement prepared by Your Shout;
11. Environmental Statement Volumes 1 & 2 comprising:
 - a. Introduction prepared by Metropolis Green;
 - b. EIA Methodology, prepared by Metropolis Green;
 - c. Alternatives Considered, prepared by Metropolis Green;
 - d. Proposed Development, prepared by Metropolis Green;
 - e. Planning Policy Context, prepared by prepared by DP9 Ltd;
 - f. Construction Management, prepared by Metropolis Green;
 - g. Air Quality, prepared by Air Quality Consultants;
 - h. Daylight and Sunlight, prepared by GIA;
 - i. Ground Conditions and Contamination, prepared by GB Card and Partners;
 - j. Noise and Vibration, prepared by Sharpes Redmore;
 - k. Socio-economics, prepared by Quod;
 - l. Sustainability and Climate Change, prepared by XCO2;
 - m. Transport, prepared by Cole Easdon;
 - n. Water Resources, Flood Risk and Drainage, prepared by Cole Easdon;
 - o. Wind Microclimate, prepared by BMT;
 - p. Cumulative Impacts, prepared by Metropolis Green;
 - q. Summary of likely residual effects, prepared by Metropolis Green;
12. Environmental Statement Volume 3: Townscape, Heritage and Visual Assessment, prepared by City Designer;
13. Environmental Statement Volume 4: Non-Technical Summary, prepared by Metropolis Green;
14. Office Report, prepared by JLL; and
15. Archaeological Assessment, prepared by CgMs.

B. Submission of further information to LBH on 14 October 2016

1. Revised Planning application form, prepared by DP9 Ltd;
2. Covering Letter, prepared by DP9 Ltd;
3. Design and Access Statement Addendum, prepared by Studio Egret West;

NB: In accordance with Regulation 22 of the Town and County Planning (Environmental Impact Assessment) Regulations 2011 (as amended), further Environmental Information which considered the proposed revisions and assessed the amended proposals was contained in an Addendum to the original Environmental Statement (December 2015). The Addendum to the Environmental Statement comprised the following:

4. Volume 1 – Revised Non-Technical Summary
5. Volume 2 – Revised Main text and Figures, comprising;
 - a. Chapter 1 – Introduction (Revised);
 - b. Chapter 2 – EIA Methodology;
 - c. Chapter 3 – Alternatives Considered (Revised);
 - d. Chapter 4 – Proposed Development (Revised);
 - e. Chapter 5 – Planning Policy Context;
 - f. Chapter 6 – Construction Management;
 - g. Chapter 7 – Air Quality (Revised);
 - h. Chapter 8 – Daylight and Sunlight;
 - i. Chapter 9 – Ground Conditions and Contamination;
 - j. Chapter 10 – Noise and Vibration (Revised);
 - k. Chapter 11 – Socio-economics (Revised);
 - l. Chapter 12 – Sustainability and Climate Change;
 - m. Chapter 13 – Transport;
 - n. Chapter 14 – Water Resources, Flood Risk and Drainage;
 - o. Chapter 15 – Wind Microclimate;
 - p. Chapter 16 – Cumulative Impacts;
 - q. Chapter 17 – Summary of Likely Residential Effects
6. Volume 3: Addendum to Townscape, Built Heritage and Visual Impact Assessment (prepared by City Designer); and
7. Volume 4 Technical Appendices.

C. Planning Application Drawings Submitted to the London Borough of Hounslow

		DATE SUBMITTED	DAY	21	14	10
			MONTH	12	10	11
			YEAR	15	16	16
DRAWING NUMBER	TITLE	SIZE	SCALE	REVISION		
SITE						
0251_SEW_xx_1000	SITE PLAN	A3	1:1250	-		
0251_SEW_xx_1010	OVERSAILING PLAN	A1	1:125	-	01	
PLANS						
0251_SEW_xx_1096	BASEMENT LEVEL 02 LOWER PLAN / 3RD CARPARK TIER	A1	1:125	-	01	
0251_SEW_xx_1097	BASEMENT LEVEL 02 LOWER PLAN / 2ND CARPARK TIER	A1	1:125	-	01	
0251_SEW_xx_1098	BASEMENT LEVEL 02 PLAN	A1	1:125	-	01	
0251_SEW_xx_1099	BASEMENT LEVEL 01 PLAN	A1	1:125	-	01	
0251_SEW_xx_1100	GROUND FLOOR PLAN	A1	1:125	-	01	
0251_SEW_xx_1101	LEVEL 01 PLAN	A1	1:125	-	01	
0251_SEW_xx_1102	LEVEL 02 PLAN	A1	1:125	-	01	
0251_SEW_xx_1103	LEVEL 03 PLAN	A1	1:125	-	01	
0251_SEW_xx_1104	LEVEL 04 PLAN	A1	1:125	-	01	
0251_SEW_xx_1105	LEVEL 05 PLAN	A1	1:125	-	01	
0251_SEW_xx_1106	LEVEL 06 PLAN	A1	1:125	-	01	
0251_SEW_xx_1107	LEVEL 07 - 09 TYPICAL PLAN	A1	1:125	-	01	
0251_SEW_xx_1110	LEVEL 10 - 12 TYPICAL PLAN	A1	1:125	-	01	
0251_SEW_xx_1113	LEVEL 13 PLAN	A1	1:125	-	01	
0251_SEW_xx_1114	LEVEL 14 - 16 TYPICAL PLAN	A1	1:125	-	01	
0251_SEW_xx_1117	LEVEL 17 - 18 TYPICAL PLAN	A1	1:125	-	01	
0251_SEW_xx_1119	LEVEL 19 - 24 TYPICALPLAN	A1	1:125	-	01	
0251_SEW_xx_1125	LEVEL 25 PLAN	A1	1:125	-	01	
0251_SEW_xx_1126	LEVEL 26 - 28 TYPICAL PLAN	A1	1:125	-	01	
0251_SEW_xx_1129	LEVEL 29 PLAN	A1	1:125	-	01	
0251_SEW_xx_1130	LEVEL 30 - 31 PLAN	A1	1:125	-	01	
0251_SEW_xx_1132	LEVEL 32 PLAN	A1	1:125	-	01	
0251_SEW_xx_1133	LEVEL 33 (ROOF) PLAN	A1	1:125	-		
SECTIONS						
0251_SEW_xx_1201	SOUTH SECTION	A1	1:250	-	01	
0251_SEW_xx_1202	WEST SECTION	A1	1:250	-	01	
0251_SEW_xx_1203	EAST SECTION	A1	1:250	-	01	
0251_SEW_xx_1204	NORTH SECTION	A1	1:250	-	01	
ELEVATIONS						
0251_SEW_xx_1301	SOUTH ELEVATION	A1	1:250	-	01	
0251_SEW_xx_1302	NORTH ELEVATION	A1	1:250	-	01	
0251_SEW_xx_1303	EAST ELEVATION	A1	1:250	-	01	
0251_SEW_xx_1304	WEST ELEVATION	A1	1:250	-	01	
0251_SEW_xx_1306	ILLUSTRATIVE STREET ELEVATION - SOUTH	A1	1:100	-	-	
0251_SEW_xx_1307	ILLUSTRATIVE STREET ELEVATION - NORTH	A1	1:100	-	-	
0251_SEW_xx_1308	ILLUSTRATIVE STREET ELEVATION - EAST	A1	1:100	-	-	
0251_SEW_xx_1309	ILLUSTRATIVE STREET ELEVATION - WEST	A1	1:100	-	-	
UNROLLED ELEVATIONS						
0251_SEW_xx_1310	BUILDING VOLUME COMPONENTS AXONOMETRIC VIEW	A1	-		-	

0251_SEW_xx_1312	EAST BUILDING VOLUME AXONOMETRIC VIEW SETTING OUT POINTS	A1	-	-	-
0251_SEW_xx_1313	EAST BUILDING VOLUME UNROLLED ELEVATION	A1	1:250	-	-
0251_SEW_xx_1314	BRIDGE BUILDING VOLUME AXONOMETRIC VIEW SETTING OUT POINTS	A1	-	-	-
0251_SEW_xx_1315	BRIDGE BUILDING VOLUME UNROLLED ELEVATION	A1	1:250	-	-
0251_SEW_xx_1316	WEST BUILDING VOLUME AXONOMETRIC VIEW SETTING OUT POINTS	A1	-	-	-
0251_SEW_xx_1317	WEST BUILDING VOLUME UNROLLED ELEVATION	A1	1:250	-	-
0251_SEW_xx_1320	UNROLLED FAÇADE DETAIL EAST BUILDING VOLUME E-A Levels 19-32 E-B	A1	1:100	-	-
0251_SEW_xx_1321	UNROLLED FAÇADE DETAIL EAST BUILDING VOLUME EA Levels 07-18 EB	A1	1:100	-	-
0251_SEW_xx_1322	UNROLLED FAÇADE DETAIL EAST BUILDING VOLUME EC Levels 19-29	A1	1:100	-	-
0251_SEW_xx_1323	UNROLLED FAÇADE DETAIL EAST BUILDING VOLUME EC Levels 06-19	A1	1:100	-	-
0251_SEW_xx_1324	UNROLLED FAÇADE DETAIL EAST BUILDING VOLUME E-D Levels 19-32	A1	1:100	-	-
0251_SEW_xx_1325	UNROLLED FAÇADE DETAIL EAST BUILDING VOLUME E-D Levels 06-18	A1	1:100	-	-
0251_SEW_xx_1326	UNROLLED FAÇADE DETAIL EAST BUILDING VOLUME ED Levels 00-05	A1	1:100	-	-
0251_SEW_xx_1327	UNROLLED FAÇADE DETAIL EAST BUILDING VOLUME EC Levels 00-05	A1	1:100	-	-
0251_SEW_xx_1328	UNROLLED FAÇADE DETAIL EAST BUILDING VOLUME EC Levels 06-19	A1	1:100	-	-
0251_SEW_xx_1329	UNROLLED FAÇADE DETAIL EAST BUILDING VOLUME EC Levels 00-05	A1	1:100	-	-
0251_SEW_xx_1330	UNROLLED FAÇADE DETAIL BRIDGE BUILDING VOLUME EA Levels 05-17	A1	1:100	-	-
0251_SEW_xx_1331	UNROLLED FAÇADE DETAIL BRIDGE BUILDING VOLUME EA Levels 00-05	A1	1:100	-	-
0251_SEW_xx_1340	UNROLLED FAÇADE DETAIL WEST BUILDING VOLUME WA Levels 06-13	A1	1:100	-	-
0251_SEW_xx_1341	UNROLLED FAÇADE DETAIL WEST BUILDING VOLUME WA Levels 15-25	A1	1:100	-	-
0251_SEW_xx_1342	UNROLLED FAÇADE DETAIL WEST BUILDING VOLUME WB WC WE Levels	A1	1:100	-	-
0251_SEW_xx_1343	UNROLLED FAÇADE DETAIL WEST BUILDING VOLUME WB WD WE Levels	A1	1:100	-	-
0251_SEW_xx_1344	UNROLLED FAÇADE DETAIL WEST BUILDING VOLUME WA Levels 00-05	A1	1:100	-	-
0251_SEW_xx_1345	UNROLLED FAÇADE DETAIL WEST BUILDING VOLUME WB Levels 00-05	A1	1:100	-	-
LANDSCAPE					
0251_SEW_xx_7000	WIDER PUBLIC REALM ILLUSTRATIVE MASTERPLAN	A1	1:200	-	01
0251_SEW_xx_7001	SECTION 278 PUBLIC REALM IMPROVEMENTS PLAN	A1	1:400	-	-
0251_SEW_xx_7002	SECTION 278 PUBLIC REALM IMPROVEMENTS PLAN (BELOW M4	A1	1:50	-	-
0251_SEW_xx_7100	LANDSCAPE GENERAL ARRANGEMENT GROUND FLOOR PLAN	A1	1:125	-	01
0251_SEW_xx_7102	LEVEL 5 RESIDENTIAL AMENITY AND OFFICE TERRACE	A1	1:125	-	01
0251_SEW_xx_7103	LEVEL 25 ROOF GARDEN	A1	1:125	-	-
0251_SEW_xx_7104	LEVEL 32 ROOF GARDEN	A1	1:125	-	-
0251_SEW_xx_7105	ACCESSIBLE AMENITY SPACE	A1	1:125	-	-

APPENDIX 3 – DOCUMENTS TO BE REFERRED TO IN THE APPELLANT’S EVIDENCE

1. The National Planning Policy Framework, Department for Communities and Local Government, March 2012
2. National Planning Practice Guidance
3. The London Plan (The Spatial Development Strategy for London Consolidated with Alterations Since 2011), Mayor of London, March 2016
4. Hounslow Local Plan 2015
5. Relevant GLA and Hounslow Supplementary Planning Documents and Guidance, including:
 - a. Homes for Londoners, the Mayor of London’s Draft Affordable Housing and Viability SPG, November 2016
 - b. Mayor of London’s Housing SPG, March 2016 (as updated on 4 May 2016)
 - c. Planning Obligations and CIL SPD, November 2015
 - d. London's World Heritage Sites - Guidance on Settings SPG (2012)
6. Hounslow’s Great West Corridor Plan Issues Consultation, December 2015
7. The planning application, including application drawings, supporting documents and other materials - as originally submitted in December 2015 and as updated in October 2016
8. Consultation responses received during determination of the planning applications
9. Reports to LBH’s Planning Committee and minutes of relevant meetings
10. GLA Stage I and Stage II Reports
11. Historic England committee reports, correspondence and relevant advice notes and guidance
12. The Royal Botanic Gardens, Kew World Heritage Site Management Plan (2014)
13. Conservation Area Statements
14. Viability information to the extent required

15. Relevant planning case law, including:

- a. *Bedford Borough Council v Secretary of State for Communities and Local Government* [2013] EWHC 2847 (Admin)
- b. *East Northamptonshire District Council v Secretary of State for Communities and Local Government and Barnwell Manor* [2014] EWCA Civ 137 [2015] 1 WLR 45.

16. Relevant planning decisions, including those referred to within the Appellant's Statement of Case

17. Any other relevant information and documents that may be required