

STATEMENT OF CONSULTATION

Staples Corner Growth Area Masterplan & Design Code (SCGA)

Supplementary Planning Document (SPD)

October 2024

This document sets out the public consultation that took place for the draft Staples Corner Growth Area Masterplan and Design Code SPD, summarises the representations received and the Council's response.

Introduction

Staples Corner Area (SCGA) is a priority growth area in the Brent Local Plan. Regeneration in SCGA aims to provide at least 2,200 new homes, employment and supporting infrastructure, including green space, transport, community facilities, and an enhanced public realm. This vision will be achieved through delivering industrial intensification and the co-location of industrial and residential uses. Through a 'master planning approach', the SCGA Masterplan & Design Code Supplementary Planning Document (SPD) has been prepared to guide the comprehensive development of the area.

The SCGA SPD sets out the vision, objectives and an Illustrative Masterplan; comprising development, sustainability and environmental principles that will guide future comprehensive development of the area. It gives a positive message that Brent welcomes and encourages new development of high-quality sustainable design and recognises the benefits that it can bring to communities.

Initial engagement informing the vision and objectives took place in summer / autumn 2022 and in spring / summer 2023 consisting of business and resident surveys, as well as a Splash event to raise awareness of the project. Further detail of this early engagement, as well as details of the stakeholders who were engaged, can be found from page 67.

The SCGA SPD includes a Design Code, to shape development proposals emerging within the area. The Design Code aims to assist developers, designers, local communities, planning officers and those determining planning applications to understand better what is expected of new developments in SCGA, depending on its surrounding context and how regeneration can be achieved holistically. A group of Staples Corner Community Champions were recruited specifically to participate in the preparation of the Design Code, for which a series of engagement workshops took place in December 2022, and January and February 2023.

An earlier version of the Draft Staples Corner Design Code was consulted on from 24 August to 2 November 2023. Consideration was given to all consultation representations, responses provided and, where necessary, changes recommended. On Tuesday 7 May 2024, the decision was taken to approve the changes to the Draft Staples Corner Design Code considering consultation responses and incorporate it into the draft Staples Corner Masterplan & Design Code SPD.

Activities that have informed the preparation of the SCGA SPD include:

1. Business and resident surveys with people living and working in Staples Corner and community groups.
2. An online Have Your Say platform for gathering feedback about the area.
3. Drop in events with people living and working in Staples Corner, businesses and community groups.
4. Targeted 1:1 engagement sessions with landowners and other key stakeholders which include the Greater London Authority, Transport for London, National Highways, the Canal & Rivers Trust, LB Barnet, Brent's Quality Review Panel and Brent's Community Review Panel.
5. A targeted session with the Young Brent Foundation.
6. A drop in Splash event to help inform the vision and objectives.
7. A series of engagement workshops with the Staples Corner Community Champions to inform the preparation of the Design Code.
8. Nine events as part of the statutory consultation process, one of which was an online event.

This Consultation Statement has been prepared in accordance with Regulation 12(a) and (b) of the Town & Country Planning (Local Planning) (England) Regulations 2012 (the

Regulations). It sets out details of the consultation that took place and which has informed and refined the SPD.

A summary of the events and how they have informed the SPD can be found within this document.

About the Statutory Consultation

The Draft SCGA Masterplan SPD was subject to six weeks of formal consultation from 4 June to 16 July 2024. This was in accordance with the Regulations and Brent Council's Statement of Community Consultation (SCI). This Consultation Statement sets out the comments received, the Council's response and where appropriate consequential changes made to the SPD. In accordance with the SCI, during the consultation period, the following process was adhered to:

- The Draft SCGA SPD, details of the project and how to get involved were published and promoted on a dedicated website:
<https://www.brent.gov.uk/business/regeneration/growth-areas/staples-corner>
- A dedicated Have Your Say page was also set up to receive comments, along with details of other ways to send comments such as by post or email:
<https://haveyoursay.brent.gov.uk/en-GB/projects/brent-have-your-say-staples-corner-consultation>
- 9,131 GovMail letters were sent to all properties within the Dollis Hill ward notifying of the statutory consultation period as well as details of the drop in events. This included letters to residents, businesses and local groups (i.e. all properties in the ward with a postal address).
- The consultation was publicised weekly via social media channels- Facebook, Twitter, Nextdoor, Instagram and LinkedIn.
- Copies of the Draft SCGA SPD were available to view at Wembley, Kilburn, Willesden, Ealing Road, Kingsbury and Harlesden libraries.
- Stakeholders and groups on the Local Planning Authority consultation database were emailed, notified of the consultation and consultation events, and invited to comment and attend the consultation events.
- Consultation updates were sent to councillors to promote the statutory consultation and events.
- A total of nine consultation sessions took place in different times and locations as summarised below. All of the events took place in the SCGA apart from Event No. 2 which took place in the nearby Gladstone Park, Event No. 8 which took place in the nearby Brent Cross West station in LB Barnet and Event No. 9 which took place in Wembley. Event No. 7 took place online (Zoom platform).
 - Event No. 1: Tuesday 12 June 12:00 – 15:00 Bellissima Ristorante, Coles Green Road
 - Event No. 2: Tuesday 18 June 13:00 – 14:00 Gladstone Park
 - Event No. 3: Wednesday 19 June 15:30 - 16:30 Young Brent Foundation, Ehatt table tennis club, Oxgate House, Oxgate Lane

- Event No. 4: Thursday 27 June 12:00 – 15:00 Bellissima Ristorante, Coles Green Road
 - Event No. 5: Wednesday 3 July 2024 17:30 – 19:30 Millenium Business Centre, Humber Road
 - Event No. 6 Tuesday 9 July 2024 13:00 to 16:30 Staples Corner business door knocking
 - Event No. 7: Wednesday 10 July 18:00 – 19:00 Online event (Zoom platform)
 - Event No. 8: Thursday 11 July 16:00 - 18:00, Brent Cross West station, Barnet
 - Event No. 9: Tuesday 16 July 10:00 - 11:00 Wembley Jobs Fair, Wembley Stadium
- In addition to the consultation described above, engagement with the following stakeholders also formed part of the Draft SCGA SPD Masterplan preparation: -
 - Brent's Quality Review Panel (QRP) – two sessions took place (22 January 2024 and 24 June 2024). The QRP applauded the excellent piece of work, highly commending the level of detail and thoroughness of both the masterplan and design code. They included a series of comments in their report, some of which has led to changes and amendments in line with their suggestions. Where comments were not carried forward into actions or changes to the document, it was felt that these were already covered by existing policy and guidance and did not need to be repeated or were addressing on a case by case basis and therefore did not warrant any change to the document.
 - Brent's Community Review Panel (1 July 2024) – a walkaround of the SCGA with panel members.
 - Department for Housing, Levelling up and Communities (regular briefing meetings during the preparation of the Design Code with comments and suggestions feeding into the development of the Design Code).

Reach

Information about the Draft SCGA SPD consultation received 6771 hits via the Council’s social media. There were 852 hits to the dedicated SCGA Have Your Say website. 178 people (including residents and other stakeholders) attended the nine consultation events and engaged in dedicated one-to-one discussions with officers about the plans. 151 people completed the surveys available in our events and online via our consultation portal. 21 people/organisations issued formal consultation responses. In total, 172 responses were received to the Draft SCGA SPD during the statutory consultation period.



Figure 1: Photos from engagement events

Overview feedback

In total, 172 people / organisations have provided comments on the draft SCGA SPD during the 6-week consultation period. The majority of comments were supportive. Below are some of the supportive quotes:

- *“Broadly agree with the plan, but I think more than 2,200 new homes should be provided on the site. It is an opportunity to create a new, sustainable, intensive residential area with large amounts of homes provided in medium- and high-rise buildings. This will drastically increase the appeal of the area in terms of amenities and buzz”.*
- *“Very excited about this overall! Brent Cross West has been a great start”.*
- *“The changes appear reasonable and will benefit the area”.*
- *“The plan is sound and a good opportunity for local communities”.*
- *“It is really positive and hope development partners will come forward to bring it to reality”.*
- *“Very exciting times for the people in the area and future developments”.*

Formal Representations

151 people completed the survey and 21 written representations were received (total 172).

Of those that completed the survey, the table below demonstrates the percentage of people that supported the proposed plans when attending the events or filling the feedback forms and the more limited percentage of people that disagreed:

Survey totals	Vision	Challenges	Opportunities	Masterplan	Design Code
Supportive	82%	77%	83%	72%	74%
Not supportive	11%	13%	7%	16%	11%
No response	1%	1%	5%	6%	8%
Not sure	6%	9%	5%	6%	7%
Totals	100%	100%	100%	100%	100%

Table 1: Survey results

As demonstrated above, 82% of respondents agreed with the Vision, 77% with the Challenges, 83% with the Opportunities, 72% with the Masterplan and 74% with the Design Code.

Of those that did not agree, the following main areas of concern were noted:

- Housing, particularly affordable housing delivery.
- Safety and poor environmental quality concerns of the area.
- Request for more local services.
- Density and building heights proposed.
- More facilities needed for young people such as play space.
- Increase in traffic and parking congestion.
- Better connection to public transport.
- Impacts on residential amenity.
- No student accommodation please.
- Impact on flooding.
- The impact on the Welsh Harp.
- Poor quality architecture.
- Support for small to medium enterprises.
- Delivery challenges given land fragmentation.

A response to these concerns are set out in the table below, with details of any proposed changes to the draft SCGA SPD in the final column. A summary of the other written representations received is also outlined within the following pages.

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION, PARAGRAPH OR PAGE NO	OFFICER SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
S01-1	National Highways	General	<ul style="list-style-type: none"> • NH welcome the vision and objectives of the Masterplan and Design Code SPD to work towards sustainable redevelopment which results in a modal shift away from single occupancy vehicle travel. • The bulk of the SPD is made up of the proposed design code for the area. There are no impacts for the Strategic Road Network as a result of anything contained within the design code. • We are currently in discussions separately with the London Borough of Brent and their consultants regarding the Staples Corner Growth Area (SCGA) Strategic Transport Study. This aims to provide a transport evidence base for redevelopment of the area and our work on this is ongoing. Whilst we welcome the policies and strategies set out in the SPD being consulted on, our comments here do not impact our ongoing work on the SCGA Strategic Transport Study. • Based on our review of the Staples Corner Masterplan and Design Code SPD, we are content that there are no implications for the SRN. 	National Highways comments are welcomed. LB Brent have been in regular discussion and dialogue with National Highways during the preparation of the draft SCGA SPD. National Highways have also been engaged with respect to the SCGA Transport Study. Per the Statement of Common Ground agreed as part of the Local Plan preparation, LB Brent will continue to engage National Highways and undertake reasonable endeavours to ensure that they are content with the SCGA Transport Study prior to adoption of the SCGA SPD.	No proposed change.
S01-2	Natural England	General	<ul style="list-style-type: none"> • Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment. 	Noted.	No proposed change.
S02-1	GLA	General	<ul style="list-style-type: none"> • On balance, the Mayor is satisfied with the work done by LBB and accordingly agrees the Draft Staples Corner Growth Area 	The GLA's comments are welcomed.	No proposed change.

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			(SCGA) Masterplan and Design Code SPD, subject to the following modifications.		
S02-2	GLA	4.4 Sub Area 1: Staples Corner West	<ul style="list-style-type: none"> Firstly, unless already in residential use, identify Use Class E as the preferred use for the upper floors of the small buildings to be retained on the northern side of the North Circular. The North Circular and the resulting intensified industrial nature of the SIL is unlikely to provide a satisfactory environment for residents and could make industrial operations susceptible to nuisance complaints. 	Noted. The upper floors of these retained properties are already in residential use and therefore in line with the GLA's comments recognising this, no change is proposed.	No proposed change.
S02-3	GLA	4.9 Sub Area 6: Apsley Way	<ul style="list-style-type: none"> Similarly, for the proposed co-located block on the northern side of Apsley Way, a pure industrial block would enable a strong edge to the future SIL boundary as well as minimise potential complaints about industrial activity. 	A pure industrial block on the northern side of Apsley Way was tested, per the development scenarios in 5.3 Design Scenarios, specifically 2A-1. The most preferred / most viable scenario forms part of the Illustrative Masterplan. There are many potential variations for how development could come forward across the SCGA. Consideration of this pure industrial typology would not be precluded subject to aligning with the Spatial Strategies and Design Code, per the text in Chapter 5.1. Based on the above, it is not felt necessary to further illustrate industrial development on Apsley Way.	No proposed change.
S02-4	GLA	4.3 General & Working Assumptions	<ul style="list-style-type: none"> Policy D13 (Agent of Change) in the London Plan 2021 should be referenced throughout the SPD to ensure that, in the context of new residential uses near the intensified industrial activity, the area continues to meet the Local Plan's ambitions to prosper as an industrial area. 	<p>Noted. The Agent of Change policy is referred to in Chapter 10.2 Sequencing and Zoning (paragraph 10.2.6). It is however accepted that an additional reference be included as follows.</p> <p>The text accompanying Map 14: Land use zoning strategy diagram to be amended to</p>	<p>To add the following text to Map 14: Land use zoning diagram to include, the following, at the end of the first paragraph.</p> <p><u>Policy D13 (Agent of Change) of the London Plan 2021 (including any subsequent policy versions)</u></p>

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			<ul style="list-style-type: none"> The draft SPD should include 24-hour, 7-days-a-week industrial operations as a working assumption of the draft SPD alongside the working assumptions already set out on page 66 of the draft document. 	<p>include reference to the London Plan Agent of Change policy.</p> <p>Working Assumptions on page 69 be amended to include reference to 24-hour, 7 days a week industrial operations.</p>	<p><u>will be a relevant consideration in determining relevant planning applications.</u></p> <p>4.3 Working Assumptions, to be amended to include the following wording under a new heading of “General Industrial Assumptions”.</p> <p><u>General Industrial Assumptions</u></p> <ul style="list-style-type: none"> <u>24 hour, 7 days a week industrial operations</u>
S02-5	GLA	Chapter 10 Delivery Approach and Phasing & General	<ul style="list-style-type: none"> In line with the Practice Note, LBB should reassure itself that the delivery of the remaining phases of the masterplan with its heavy reliance on stacked industrial floorspace is viable over the plan period and set out how the proposed infrastructure improvements will be funded. In this regard, the SPD or Design Code should also set out some basic design or operational objectives for the industrial floorspace to ensure it can be effectively occupied by a broad variety of industrial uses, and especially heavier industrial uses that are most appropriately located SIL. 	<p>Noted. Financial viability and deliverability of the Illustrative Masterplan, including stacked industrial typologies has been tested, a report of which accompanies the SCGA SPD.</p> <p>In relation to the setting out of design or operational objectives, the SPD has tested a number of industrial typologies, including stacked options. It is not the scope of the Design Code to code for the industrial spaces themselves.</p>	No proposed change.
S02-6	GLA	Design Code	<ul style="list-style-type: none"> The “green fingers” connecting the reservoir to the masterplan should align with the pedestrian links and could be more generous in size. 	<p>The ‘green fingers’ are indicated in Section 3.6, Map 23 are primarily strategic, but have been embedded in the Illustrative Masterplan. Design codes have been included to support the delivery of these where practically possible and to align with the pedestrian links.</p>	No proposed change.

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S02-7	GLA	Design Code	<ul style="list-style-type: none"> Landscaping in industrial areas must be robust to withstand heavy goods vehicles and help reduce air pollution for future residents. Stronger language is needed to ensure effective greening in these zones, as it impacts streetscape quality and pedestrian experience. 	<p>Noted. Assuming this is in relation to planting withstanding difficult growing condition, then the Design Code can be amended to address this accordingly.</p> <p>It is also felt that reference to the need for planting to improve air quality should be added in Section 9.5 Planting Strategies.</p>	<p>Section 7.1 – amended design code R.06 to read as follows:</p> <p>Tree and plant species selected as part of development proposals and public realm improvements must be able to endure <u>difficult growing conditions and</u> prolonged severe weather conditions, such as drought and heavy rainfall, and where relevant, well-suited to SuDS.</p> <p>Section 9.5 – Planting Strategies. New sentence to be added as follows:</p> <p><u>Planting will also be required to improve air quality.</u></p>
S02-8	GLA	4.3 Working Assumptions	<ul style="list-style-type: none"> The masterplan assumes Cross Laminated Timber (CLT) construction for residential towers between 6-10 storeys. However, updates to Approved Document B3 ban structural timber in external walls of buildings over 18m tall, making it challenging to deliver CLT towers of this height. 	<p>Noted. It is recommended that this be deleted in the document.</p>	<p>4.3 Working Assumptions to be amended to amended to delete reference to CLT construction:</p> <ul style="list-style-type: none"> Generally max 10 stories to allow for CLT construction.
S02-9	GLA	Design Code	<ul style="list-style-type: none"> The design guidance should ensure the service yards are sufficient for the intensified industrial floorspace to limit any impact on the highway and to ensure the space is attractive to a broad range of occupiers. 	<p>Noted. Under 4.3 Working Assumptions, it is recommended to add wording to ensure that service yards are designed to be sufficient for the intensified industrial floorspace.</p>	<p>Under 4.3 Working Assumptions, add the following wording:</p> <p><u>Service yards should be designed to be sufficient for the intensified industrial floorspace to limit any</u></p>

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					<u>impact on the highway and to ensure the space is attractive to a broad range of occupiers.</u>
S03-1	Canal & Rivers Trust	General	<ul style="list-style-type: none"> We would welcome direct reference to the Canal & River Trust within the document, as the owners of the Brent Reservoir. We would also request that developers of sites close to the reservoir be encouraged to discuss their proposals with the Trust at the earliest design stage. 	Noted. It is recommended that Section 3.6 Green and Blue Infrastructure and Section 9.5 Environmental Sustainability be amended accordingly.	<p>Section 3.6 Green and Blue Infrastructure – new sentence added to para 3.6.2 as follows:</p> <p><u>The Canal & Rivers Trust are owners of the Brent Reservoir.</u></p> <p>Section 9.5 Environmental Sustainability - new paragraph added as follows:</p> <p><u>The Canal & Rivers Trust are owners of the Brent Reservoir, and it is recommended they are consulted with respect to any proposals close to the reservoir at the earliest design stage.</u></p>
S03-2	Canal & Rivers Trust	3.6 Green & Blue Infrastructure Strategy	<ul style="list-style-type: none"> This section should also include: 8) Manage invasive species (Japanese Knotweed, Giant Hogweed) to improve the growth of native species around the Brent Reservoir. 9) Cutback of willow trees to improve the growth of natural reed beds. There is a lot of contaminated land in the Staples Corner area, and it appears there are also surface water discharges that discharge poor water quality into the reservoir, adversely affecting its overall water quality. Any new surface water discharges proposed as part of developments should be controlled, and 	<p>It is felt that including reference to invasive species and the cutback of willow trees is not appropriate since it is the CRT who should be responsible for managing these operational matters on Brent Reservoir land. No change is recommended.</p> <p>An additional sentence is recommended in relation to new surface water discharges and contamination risk in Section 9.5.</p> <p>On fly tipping and tackling litter, a new paragraph can be added at 3.6.6 to refer to these issues.</p>	<p>Section 9.5 Environmental Sustainability, under Water Use, add:</p> <p><u>Any new surface water discharges proposed as part of developments should be controlled, and details reviewed and agreed through the planning process.</u></p> <p><u>Future developments, including any swales and water features, should be designed to avoid poor water quality discharges, and to improve existing surface water</u></p>

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			<p>details reviewed and agreed through the planning process.</p> <ul style="list-style-type: none"> Swales and water features potentially introduce further contamination risk to the reservoir, and future developments should be designed to avoid poor water quality discharges, and work to improve existing surface water discharges and other water sources that reach the reservoir. The reservoir also suffers from fly-tipping from adjacent properties, and developments coming forward should be designed to prevent opportunities for this. Where the River Brent enters the Brent Reservoir, there is the River Brent trash screen, owned by the Environment Agency. This is not regularly cleaned and maintained, and many wet wipes and other waste from the River Brent enter the Brent Reservoir here. The Trust is having to clear large amounts of rubbish near the trash screen on a weekly basis. We would therefore support the explicit mention of tackling litter in the document, especially at the trash screen area. A large development close to the reservoir previously helped to fund a part time dedicated ranger of the SSSI, and this could help manage this sort of issue. 		<p><u>discharges and other water sources that reach the reservoir.</u></p> <p>New paragraph 3.6.5 at Section 3.6 Green and Blue Infrastructure, as follows:</p> <p><u>Future developments in the area should seek to prevent opportunities for fly tipping and litter dropping in the Brent Reservoir, especially in the location of the River Brent trash screen, where the River Brent enters the Brent Reservoir.</u></p>
S03-3	Canal & Rivers Trust	4.2 The Illustrative Masterplan	<ul style="list-style-type: none"> CRT note that General industrial / Storage & distribution / Data centre / Substation uses are indicated along the boundary with the Brent Reservoir. The implementation of enhanced green buffer zones around the new developments will be key in helping to lessen disturbance to Brent Reservoir from these industrial uses. 	Noted. Planting and buffer zones are shown on the Illustrative Masterplan and therefore no change is proposed.	No proposed change.

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S04-1	Historic England	General	<ul style="list-style-type: none"> The draft SPD is missing some historic environment baseline data. This leads us to query whether heritage has been considered as required (i.e. in terms of conserving/enhancing and placemaking) and to advise further consideration of the area's historic environment based on a proportionately robust understanding of the historical development of the area and the extant heritage assets within it, and their significance. 	A new historic environment map to be added to the document to include heritage assets. For completeness, it is recommended that some of the heritage features be taken out of Map 6 Existing site plan with Growth Area and SIL boundaries and included on this new map. All relevant features to include a short description and will include surrounding listed buildings, locally listed buildings/areas and Archaeological Priority Areas.	<p>A new Historic Baseline map to be added to the document in a new Section 2.3 (Historic Environment) to include mapping of the following features including some written wording to explain their origins:</p> <ul style="list-style-type: none"> Heritage assets Buildings of architectural character Tier 2 Archaeological Priority Area Welsh Harp Open Space Neasden Recreation Ground Gladstone Park
S04-2	Historic England	1.1 Overarching Vision Statement	<ul style="list-style-type: none"> Recognise that the SCGA may not be an especially rich heritage area. London Plan Policy D3 requires a design led approach to optimising site capacity that responds to the existing character of a place, respecting and enhancing heritage assets. HC1b also explicitly required that the historic environment and its significance should be used to inform a 'clear vision. We therefore advise that the historic environment is woven into the vision statement e.g "A functional and permeable place with improved environment for active travel, health, biodiversity, and ecology <u>and heritage</u>" 	Noted. It is recommended that heritage be added to the vision statement.	<p>1.1 Vision, to make the following additions:</p> <ul style="list-style-type: none"> A functional and permeable place with improved environment for active travel, health, biodiversity, and ecology <u>and heritage</u>"

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S04-3	Historic England	1.2 Values and objectives	<ul style="list-style-type: none"> We welcome the recognition of the area’s heritage within the “Destination Corner” and “Celebrate the existing objectives”. However, we would query how effectively these are being delivered when there is only one area wide design code criteria relating to the historic environment (1.01, Page 113) and the retention/ interpretation of historic assets and /or buildings of historic / architectural character, does not appear to have been fully considered. If heritage is to be a primary factor in design (as required by the London Plan), then this ought to come across more consistently otherwise these objectives will be undermined. 	Noted. Reference to heritage principles is also included in C.01 (where a comprehensive context study incorporating an analysis of notable local buildings, amongst other factors), is required. This is the first design code in the document and therefore sets this clear, strategic requirement.	No proposed change.
S04-4	Historic England	1.3 Opportunities	<ul style="list-style-type: none"> Heritage is not mentioned in this section at all, yet the industrial character and green infrastructure of SCGA and the surrounding area are of historic origin and comprise heritage assets. This should be acknowledged at paragraphs 1.3.5 and 1.3.6. 	Noted. This can be amended and heritage acknowledged at paragraph 1.3.5 which relates to industrial identity. It is not felt appropriate to add a heritage reference to 1.3.6 since this paragraph relates to green infrastructure and so is a different subject matter.	Paragraph 1.3.5, to add the following words: 1.3.5 Industrial identity: Identity and character should respect the industrial legacy <u>and heritage</u> . Architecture should have an industrial character and materials palette.
S04-5	Historic England	1.4 Opportunities / 1.5 Challenges	<ul style="list-style-type: none"> The grade II* Oxgate Farm is potentially the oldest building in Brent and it is at risk. Does the masterplan provide an opportunity to think strategically about ensuring that the building is preserved through proactive planning and Community Infrastructure Levy contributions? 	The Oxgate Farm exists outside of the SCGA boundary. It was the subject of a refused planning application (Ref 22/2478) which was subsequently allowed at appeal (Appeal Ref APP/T5150/W/23/3320652) on 9 November 2023 and this should safeguard the future of the existing building.	No proposed change.
S04-5	Historic England	1.5 Site history	<ul style="list-style-type: none"> This section should be revised to identify key extant heritage assets and buildings of 	Noted. Please refer to S04-1 above.	As above under S04-1.

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			architectural character and to explain their origins.		
S04-6	Historic England	1.5 Site history	<ul style="list-style-type: none"> Recommend that a key is provided to the mapping to make clear what the map colours denote. 	Noted. A new key can be added to reference the colours on the map.	1.5 Site History: Add a new key to reference the colours on these maps.
S04-7	Historic England	2.2 Policy context and Map 6: Existing site plan with Growth Area and SIL boundaries	<ul style="list-style-type: none"> A locally listed building – Oxgate Admiralty Citadel, 403-405 Edgware Road is missing from the historic environment baseline. So too has the Tier 2 Archaeological Priority Area that runs along the Edgware Road and the eastern boundary which demarcates the potential for the remains of a Roman to modern road. The Welsh Harp Open Space and Neasden Recreation Ground as well as Gladstone Park are also locally listed heritage assets. The draft SPD (page 48) incorrectly identifies Brent Reservoir as having heritage significance and also mentions that there are buildings of heritage significance in sub area 4 along the North Circular Road (page 74) as well as in sub area 7 (Atlas Business Estate). However, these are not mapped. All heritage assets need to be identified, mapped and their significance understood. The SPD should then demonstrate clear consideration of their conservation/enhancement and potential to deliver wider public benefits especially in terms of place making. The need for heritage and / or archaeological design based assessments 	Noted. Please refer to S04-1 above.	As above under S04-1.

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			(and potentially pre application evaluations) is made clear within the policy context.		
S04-8	Historic England	2.2 Policy context and Map 6: Existing site plan	<ul style="list-style-type: none"> According to the Local Plan Policies Map, the mapped “Areas of Archaeological Interest” should be “Archaeological Areas of Importance”. We suggest amending this. 	Noted. This will be amended as these designations have been replaced by Archaeological Priority Areas Tiers 1-3. To be mapped on the new Historic Baseline map per S04-1.	Per S04-1, Archaeological Priority Areas to be mapped on a new Historic Baseline Map, per S04-1.
S04-9	Historic England	2.2 Policy context and Map 6: Existing site plan	<ul style="list-style-type: none"> To align with London Plan Policy D3 and demonstrate how the masterplan is responding to local character, we also advise the mapping of any buildings that do not qualify as heritage assets, but which have architectural character. 	Noted. Please refer to S04-1 above.	As above under S04-1.
S04-10	Historic England	Paragraph 3.6.1	<ul style="list-style-type: none"> Suggest paragraph is amended to better explain the heritage significance of Brent Reservoir and Gladstone Park. This currently stated to derive from their historic recreational and historic value but Brent Reservoir also has historic value as a remnant of the early industrialisation of the area, having been built to feed the Grand Union and Regents Canal. Meanwhile Gladstone Park is a reminder of the area’s rural history and a remnant of Dollis Hill House parkland with surviving designed features including parkland trees, the lake and walled garden. 	Noted. This paragraph will be amended to include this additional heritage information.	Chapter 3.6 Green and Blue Infrastructure, paragraph 3.6.1 to insert the following, after the second sentence.: <u>Brent Reservoir also has historic value as a remnant of the early industrialisation of the area, having been built to feed the Grand Union and Regents Canal. Meanwhile Gladstone Park is a reminder of the area’s rural history and a remnant of Dollis Hill House parkland with surviving designed features including the stables, parkland trees, the lake and walled garden. In the north-west, a monument dedicated to prisoners of war and the victims of concentration camps in WWII by sculptor Fred Kormis (1887-1986).</u>

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S04-11	Historic England	3.7 Strategic aims, Tall Building	<ul style="list-style-type: none"> Welcome the strategic aim to not unacceptably impact on the protected local view from Golders Hill to Harrow on the Hill. However, it is not clear what the value of this view is and whether it has any heritage value. Golders Hill Park was created from the grounds of Golders Hill House (reportedly landscaped by Capability Brown, Humphrey Repton and Robert Marnock. It is therefore possible that the park has heritage significance and that the view could relate to that significance meaning that change to the view may require a heritage impact assessment of Golders Hill Park as well as a visual impact assessment of the view. 	<p>Noted.</p> <p>It is understood that this Barnet protected local view is cast towards St. Mary's Church atop Harrow-on-the-Hill which provides for a landmark feature. This vantage point is narrow in scope, particularly in the warmer months when trees are in full leaf. The trees mask the significant number of taller buildings in the valley floor around Brent Cross and the southern part of Edgware Road. The precise corridor which is being protected needs further consideration by LB Barnet.</p> <p>However, in terms of responding to the protected view, it has influenced the approach to building heights in the Illustrative Masterplan, per Map 26: Building heights strategic aims diagram. As noted in paragraph 4.1.7 on Design Limitations, Townscape and Visual Impact Assessments will be required (for tall buildings) as schemes come forward for planning permission.</p>	No proposed change.
S04-12	Historic England	3.7 Tall building Strategy	<ul style="list-style-type: none"> Welcome the tall building objective of considering the setting of the locally listed Brent Reservoir but this should be amended to encompass responding sensitively to the significance (i.e. setting) of all nearby heritage assets. 	It is felt that this objective, of responding sensitively to the significance of all nearby heritage assets is already covered by existing policy and guidance in the London Plan and Local Plan and therefore it is not considered necessary to repeat here.	No proposed change.
S04-13	Historic England	3.7 Tall Building Strategy, Map 26 (now Map 27)	<ul style="list-style-type: none"> Map depicts four areas outside of the SCGA that are considered opportunities for tall buildings. Three are along Coles 	Noted. These are errors on the map and therefore can be deleted.	Tall Building Strategy, Map 26 (now Map 27):

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			<p>Green Road, with two either side of the grade II* listed Oxgate Farm. We required clarification on the suggestion that areas outside of the SCGA are being considered for tall buildings as this does not accord with the Local Plan and its evidence base.</p> <ul style="list-style-type: none"> Concern with adverse effect on Oxgate Farm if they are. 		Delete the four mid yellow shaded areas, lying outside of the SCGA on the map.
S04-14	Historic England	4.1 Introduction	<ul style="list-style-type: none"> Would welcome an explicit reference that the policy objectives include celebrating the boroughs heritage. 	Noted. It is not considered necessary to make this change. A new map of relevant features is to be included in the document, per S04-1 above.	No proposed change.
S04-15	Historic England	4.2 Illustrative Masterplan, Map 28 (now Map 29)	<ul style="list-style-type: none"> Map shows existing buildings to be retained. When compared with Map 8: Existing Landmarks and Buildings of Notable Architectural Character in the draft design code, it shows that only one of six such buildings is being retained. The buildings lost comprise the locally listed Oxgate Admiralty Citadel, Victoria Works, Sayer House, part of the Atlas Business Centre and the China House. Historic Environment policy requires that great weight be given to the conservation of heritage assets and that harm is avoided and minimised and any loss justified by public benefits. 	<p>Figure 8 in the draft Design Code consulted on in 2023 highlighted 'buildings of notable architectural language and character', but only Oxgate Farm is a designated heritage asset, and this sits outside the Growth Area boundary.</p> <p>The Ox & Gate public house is considered to be a non-designated heritage asset, but again it sits outside the Growth Area boundary. Any development proposals on neighbouring sites would need to be assessed on their own merits.</p> <p>In terms of the Oxgate Admiralty Citadel, this site is subject to a live planning application (ref 20/4143) and heritage will be considered in the planning balance as part of the determination process.</p> <p>Whilst the retention of Victoria Works, Sayer House, Atlas Business Centre and</p>	No proposed change.

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				China House is encouraged due to their contribution to the character of the area, their significance is not such that this is an absolute requirement. As mitigation, R.03 clearly states that, “Opportunities for reuse, adaptation and retrofitting must be explored as a first approach to any and all development proposals” and is considered sufficient.	
S04-16	Historic England	4.7 Sub-Area 4 North Circular	<ul style="list-style-type: none"> Welcome retention of buildings but there is no baseline data on those buildings. Suggest “Site History” section is used to make clear which heritage assets are extant. 	Noted. Please refer to S04-1 above.	No proposed change.
S04-17	Historic England	4.10 Sub- Area 7 Atlas Business Centre	<ul style="list-style-type: none"> The draft Design Code does not identify the rear portion of Oxgate House as having heritage value, only the mid century building fronting Oxgate Lane (which the masterplan proposed to be replaced). Further information on Oxgate House, how it relates to the design code and informs the masterplan is therefore needed. Further to this, we would query whether design options retaining the mid century building have been considered. 	<p>Whilst Figure 8 in the draft Design Code consulted on in 2023 highlighted the Atlas Business Centre as a building of notable architectural language and character, as the Illustrative Masterplan developed, an assessment of its heritage value was undertaken. This concluded that on balance the retention of only the rear portion of Oxgate House was a priority, for the reasons set out in this SPD.</p> <p>However, as mitigation, R.03 clearly states that, “Opportunities for reuse, adaptation and retrofitting must be explored as a first approach to any and all development proposals” and is considered sufficient.</p>	No proposed change.
S04-18	Historic England	4.13 Sub Area 9 Wing Yip and Oxgate Centre, Bullet point three	<ul style="list-style-type: none"> Proposed building heights are 22 to 31 storeys, stepping down to 12 to 16 storeys. We would query the evidence base for this given that Brent Tall Buildings Strategy 	Noted. The Brent Tall Building Strategy is now considered superseded as noted in paragraph 8.39 of the strategy:	No proposed change.

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			identified the area as being appropriate for tall buildings of six to 20 storeys (i.e. 18-60m AOD).	<p><i>“Masterplanning work will be undertaken to establish suitable development forms and heights”.</i></p> <p>It should also be noted that the Brent Tall Building Strategy is not an adopted document, but instead forms part of the Local Plan evidence base.</p>	
S04-19	Historic England	7.1 Area wide Design Codes: Identity	<ul style="list-style-type: none"> The 2023 draft design code included heritage with place making vision priority 11 and two of the area wide design criteria relating to Identity (I.09A) and Built Form (B.01.A). Heritage is now only mentioned once in the side wide design code criteria at Identity – I01. Suggest as a minimum that the original built form criteria is returned. 	Noted. Please refer to S04-3 above.	No proposed change.
S04-20	Historic England	7.1 Area wide Design Codes: Resources	<ul style="list-style-type: none"> Welcome support for re-use and retrofit at R.03 but are any of the buildings of traditional construction (i.e. pre 1919)? These will required a whole building approach informed by heritage expertise. 	Detailed analysis of how individual buildings are constructed across the Growth Area has not been undertaken and is considered beyond the scope of this SPD. As set out in R.03, “Opportunities for reuse, adaptation and retrofitting must be explored as a first approach to any and all development proposals” and will be assessed on a case-by-case basis.	No proposed change.
S04-21	Historic England	8.4 Coles Green Road: Identity Design Code (I.05)	<ul style="list-style-type: none"> The criteria states that notable existing buildings of architectural character along Coles Green Road should be retained. If these buildings are of heritage value then this should be stated too. 	I.05.CGR encourages the retention of 158-162 Coles Green Road – whilst not designated or non-designated heritage assets, they are proposed to be retained within the Illustrative Masterplan on the basis of their contribution to the character of the area.	No proposed change.

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S04-22	Historic England	8.5 Humber Road, 8.7 Apsley Way & Brook Road, 8.8 East-West Service Route and 8.9 North-South Spine Route	<ul style="list-style-type: none"> There are several references to residential building potentially incorporating “Metroland” inspired architectural features (eg I.05,HBR, 1.08.WLR, I09.AWB, I08.NSS etc). Please can the SPD explain the historical character context for this. 	It is felt the Metroland character of Brent is well understood and established and it is therefore not considered necessary to expand on this further in this SPD.	No proposed change.
S04-23	Historic England	Chapter 8 Design Code C: Streets	<ul style="list-style-type: none"> Query whether it would be helpful to have a map showing how design code streets relate to the masterplan sub areas (e.g Edgware Road is sub areas 5,9 and 10)? 	It is not considered necessary to provide a map of how design code streets relate to masterplan sub areas. The purpose of the Design Code is to provide a holistic overview of how improvements could be made to the public realm and streetscape. Landowners and developers should be able to clearly understand what street(s) and masterplan sub area their site relates to.	No proposed change.
S04-24	Historic England	Appendix C – Additional Guidance	<ul style="list-style-type: none"> 2019 reference to Brent Tall Buildings Strategy should be 2020. Suggest that additional historic environment guidance is added to this section (2015 and 2017) as well as Natural England Green Infrastructure Principles. 	<p>Noted. The reference to Brent Tall Building Strategy will be amended to 2020.</p> <p>The other documents, whilst still relevant, are not felt necessary to specifically include in the Appendix.</p>	<p>Appendix C – Additional Guidance to be amended as follows:</p> <ul style="list-style-type: none"> Brent Tall Building Strategy (2019) <u>(2020)</u>
S05-01	Historic England	Draft Strategic Environmental Assessment Screening Statement	<ul style="list-style-type: none"> In the absence of a complete historic environmental baseline and any detail regarding the implementation of historic environment policies, it is not clear whether potential impacts, and their significance have been understood or considered. Therefore query the SEA’s reasoning that the SPD aligns with relevant policy and unlikely to result in significant environmental effects. 	<p>Noted. Please refer to S04-1 above.</p> <p>Additional wording to be added to the Draft Strategic Environmental Assessment Screening Statement to refer to the additional Historic Environmental map and baseline information added.</p> <p>In relation to the reference to the Brent Tall Building Strategy 2020, please refer to S04-18 above. Notwithstanding some</p>	<p>Additional wording to be added to the Draft Strategic Environmental Assessment Screening Statement as follows:</p> <p><u>Historic environmental baseline features have been mapped across the SCGA and therefore have been duly referenced and noted in the document.</u></p>

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			<ul style="list-style-type: none"> Also query whether the SEA can be valid with respect to building heights up to 31 storeys which exceeds heights of the Tall Building Strategy 2020. 	<p>additional wording to be added to the Draft Strategic Environmental Assessment Screening Statement to cover this point.</p>	<p><u>The Brent Tall Building Strategy is now considered superseded as noted in paragraph 8.39 of the strategy which states that: “Masterplanning work will be undertaken to establish suitable development forms and heights”.</u> The draft SCGA SPD has developed its tall building strategy taking into account the site topography and the 24m level change across the SCGA, the locally protected view from Golders Hill to Harrow on the Hill, the emerging development at Brent Cross Town, the setting of the locally listed Brent Reservoir and public transport accessibility levels. Building heights also respond sensitively to the suburban, low density streets to the south.</p> <p><u>It is noted that the heights exceed those referred to in the Brent Tall Building Strategy 2020 but as above, the masterplan has superseded this strategy and determined the acceptable heights with reference to the factors described above.</u></p>
S06-01	Environment Agency	3.6 Green and Blue Infrastructure	<ul style="list-style-type: none"> Any new developments (and existing) must make sure their drainage is correctly connected. Some recognition of this and the role of new development in better managing the extent of pollution entering 	<p>Noted. The Canal & Rivers Trust made similar comments – see S03-02.</p> <p>On the second point, this can be changed.</p>	<p>See above under S03-02.</p> <p>Paragraph 3.6.6 to be amended as follows:</p>

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			<p>the Brent from this industry would be positive.</p> <ul style="list-style-type: none"> We recommend that the wording in paragraph 3.6.4 is altered from '<i>ecological value</i>' to '<i>ecological status</i>'. 		<p><u>Generally, the ecological status value inside the growth area is relatively low.</u></p>
S06-02	Environment Agency	3.6 Strategic Aims, Map 21 (now Map 22)	<ul style="list-style-type: none"> We recommend that reducing flood risk is added as a benefit and strategic aim of utilising SuDS. We also note that points F and G appear to be identical. We strongly recommend one of these is changed to state SuDS should also improve the quality of surface water runoff and water quality. We recommend that a further strategic aim is added along the lines of "Achieve improvements and prevent deterioration of the ecological statuses of the Brent Reservoir/Welsh Harp and the River Brent and of their associated WFD elements." 	<p>Noted. Reducing flood risk can be added as a benefit and strategic aim of SuDS.</p> <p>Point G to be changed in line with the recommendation.</p> <p>A further strategic aim can be added in line with the recommendation. However reference to the WFD (Water Framework Directive) is considered to be too technical for the purposes of this document and it is recommended this wording is not included.</p>	<p>Strategic Aims Map 21 (now Map 22) to be changed as follows:</p> <p>F) Introduce new SuDS along existing and new streets to improve air quality, <u>contribute to urban greening and reducing flood risk.</u></p> <p>G) Introduce new SuDS along existing and new streets to improve air quality and contribute to urban greening. SuDS should also improve the quality of surface water runoff and water quality.</p> <p><u>H) Achieve improvements and prevent deterioration of the ecological statuses of the Brent Reservoir/Welsh Harp and the River Brent.</u></p>
S06-03	Environment Agency	3.6 Green and Blue Infrastructure Strategy, Map 22 (now Map 23)	<ul style="list-style-type: none"> It is positive to see River Restoration as one of the key aims (point 7). However, the methods suggested (floating reedbeds and riverbed planting) are not the most appropriate methods for this type of waterway. We suggest changing the wording to '<i>river naturalisation and enhancement</i>' so it is not as specific at this stage. 	<p>Noted. This can be amended in line with the suggestion.</p>	<p>Green & Blue Infrastructure Strategy, Map 22 (now Map 23) to be changed as follows:</p> <p>7) Make River Brent accessible and enhance its setting with riverbank restoration, floating reed beds and riverbed planting, <u>river naturalisation and enhancement.</u></p>

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S06-04	Environment Agency	4.6 Sub Area 3 Aquarius Business Park	<ul style="list-style-type: none"> This sub-area is in close proximity to the Brent Reservoir SSSI, and the river Brent. An 8m buffer zone from the top of bank of the river Brent would be required to allow a natural riparian buffer zone. Therefore, no buildings, hard standings, and paths etc., should be suggested in this zone. We strongly recommend that the requirement for an 8m buffer zone is referred to within the illustrative masterplan for Sub-Area 3. If the red-line boundary falls within 10m of the watercourse, the watercourse module of the statutory biodiversity metric must be completed as part of the biodiversity net gain proposals for this area. 	<p>The 8-metre buffer relates to a byelaw which requires the Agency's consent of a licence to develop within this distance of an ordinary water course. Historically this has been used to stop obstructions for maintenance of watercourses. The scope more recently appears to have widened to ensure a more natural environment. Additional wording can be added to Sub Area 3: Aquarius Business Park to include reference to this natural riparian buffer zone.</p> <p>Regarding the statutory biodiversity metric, this is covered by existing policy namely London Plan Policies G6 and BG11 and Local Plan Policy BG11. It is not considered necessary to repeat the policy requirements here.</p>	<p>To add the following wording to 4.6 Sub Area 3: Aquarius Business Park in a new bullet point:</p> <ul style="list-style-type: none"> <u>This sub-area is in close proximity to the Brent Reservoir SSSI, and the river Brent. An 8m buffer zone (an Environment Agency byelaw) from the top of bank of the river Brent would be required to allow a natural riparian buffer zone. Therefore, no buildings, hard standings, and paths etc., should be provided in this zone.</u>
S06-05	Environment Agency	General	<ul style="list-style-type: none"> It is indicated that some of the proposed sites will be industrial in nature. Certain industrial activities (such as an installation or waste activity) will require an Environmental Permit. 	Noted.	No proposed change.
S06-06	Environment Agency	Chapter 7 Design Code B: Area Wide Design Codes	<ul style="list-style-type: none"> Suggest one addition to the nature design codes, to add that greenfield runoff rates should be required in the Staples Corner Growth Area. Resources R.03 - we would, however, like to see water specifically mentioned as a resource where usage improvements should be sought. Resources R.05 – would like to see that an 'Excellent' rating must be achieved 	<p>Noted. This SPD is not seeking to replicate policy and matters related to greenfield runoff rates are already covered by Policy SI13 of the London Plan, and therefore not specific to Staples Corner.</p> <p>Similarly, matters relating to the water efficiency of new development is already captured as part of the planning process and within existing planning policy.</p>	No proposed change.

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			<p>specifically in the water efficiency (WAT 01) category.</p> <ul style="list-style-type: none"> Recommend a new Design Code added under “Nature” - “Development proposals must protect and enhance groundwater and land quality”. 	<p>In terms of R.03, there is no need to highlight water as a resource specifically. Equally, groundwater would be covered as a “blue asset” under N.01.</p>	
S06-07	Environment Agency	Chapter 9 Infrastructure, Sustainability and Energy, Paragraph 9.5	<ul style="list-style-type: none"> We welcome the promotion of “the use of green, blue and brown roofs could also be explored in the next stages of design by developers.” However, we recommend the wording is changed from could to should to strengthen the design code. 	<p>Noted, this can be changed in line with the recommendation.</p>	<p>9.5 Environmental Sustainability, under Drainage, amend as follows:</p> <p>The use of green, blue and brown roofs could should also be explored in the next stages of design by developers.</p>
S07-01	Sport England	General	<ul style="list-style-type: none"> Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site sports facilities and/or providing additional capacity off-site which does not appear to be addressed in the SPD. The level and nature of any provision should be informed by an up-to-date and robust evidence base for sport facility provision which the Council do not appear to have as the Open Space, Sports and Recreation Study was developed in 2019 and is likely to be considered out-of-date. Sport England, therefore, encourage that the Council develop Playing Pitch and Built Sport Facility Strategies. 	<p>Noted. It is considered that these aspects are covered separately by other policy documents, such as London Plan policies S4 Play and Informal Recreation and S5 Sports and Recreation Facilities, as well as BSI1 Social Infrastructure and Community Facilities of the Local Plan. It is felt that these policies do not need to be repeated in the document.</p> <p>It should also be noted that a Play and Informal Recreation Strategy is a requirement for all planning applications for new residential development.</p> <p>Comments made in relation to encouraging the development of a Playing Pitch and Built Sport Facility Strategy will be taken into account during the Local Plan Review.</p>	<p>No proposed change.</p>

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S07-02	Sport England	General	<ul style="list-style-type: none"> • Sport England recommends that the Council strengthen their vision to improve the health and wellbeing within the area by having clear references to Active Design, its principles and the Active Design Checklist within the SPD. • Active Design Principles (and the completion of the Checklist being a requirement of any planning application submission) could be requirements of the area design code(s). • Active Design, produced by Sport England working with Active Travel England and the Office for Health Improvement and Disparities, is a guide to planning new developments that create the right environment to help communities to get more active and improve the local population's health and wellbeing. 	Noted. Brent has developed an Active Travel Implementation Plan 2024 – 2029 which was published in draft in September 2023. Whilst it is accepted that the principles contained within the document may differ from Sport England's Active Design Principles, it is felt that this place based SCGA SPD is not the most appropriate place to refer to these Active Travel principles and they are best placed to be addressed in these other topic based documents, such as the Brent Active Travel Implementation Plan 2024 – 2029.	No proposed change.
S07-03	Sport England	General	<ul style="list-style-type: none"> • The SPD should consider sports uses, such as fitness clubs, gyms, climbing centres and five aside centres, to be acceptable on employment sites as they do create sustainable employment opportunities and provide work experience and qualifications. 	Noted. For these specific types of uses, the relevant policies of the London Plan and Local Plan will be referred to, to determine acceptability if these uses do come forward.	No proposed change.
S07-04	Sport England	7.1 Area – Wide Design Code N.04	<ul style="list-style-type: none"> • Sport England suggests that Design Code N.04 is amended to allow the exception for the provision of community sport and recreation facilities if there is a future need locally for such a provision. 	Noted. Please refer to S07-03 above.	No proposed change.
S08-01	Thames Water	General	<ul style="list-style-type: none"> • The existing water and wastewater networks are likely to require upgrades in order to support the growth proposed 	Noted. It is recommended that some additional wording is added to 9.5	New sentence to 9.5 Environmental Sustainability, first paragraph on Water Use:

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			<p>within the Staples Corner Growth Area. In this context we would encourage early engagement with the developers as recommended in the Local Plan and there may be benefit in also referencing the need for early engagement with Thames Water within the masterplan.</p> <ul style="list-style-type: none"> In relation to water consumption, Thames Water offer environmental discounts for water efficient development through reductions in infrastructure charges for new development. 	Environmental Sustainability to address this.	<p><u>The existing water and wastewater networks are likely to require upgrades in order to support the growth proposed. Developers are encouraged to engage with Thames Water at the earliest opportunity regarding water and wastewater infrastructure requirements.</u></p>
S09-01	Barnet Council	3.7 Tall Building Strategy, Map 25 (now Map 26)	<ul style="list-style-type: none"> It is clear that development along the Edgware Road is capable of supporting taller buildings, reflecting the emerging Brent Cross Cricklewood regeneration scheme which has already consented a number of tall buildings, and taking advantage of good public transport connectivity. There is, however, a need for a cohesive approach to development scale and massing along this key transport route to ensure good place making and urban design. 	Noted. Regular meetings have taken place with Barnet Council to ensure co-ordination and these will continue as development proposals come forward.	No proposed change.
S09-02	Barnet Council	9. Infrastructure, Sustainability & Energy	<ul style="list-style-type: none"> Chapter 9 of the Draft Staples Corner SPD notes that the Waste Transfer Station off Geron Way approved would provide refuse derived fuel for a District Heating Network (Figure 61). This is not the case. The approved Waste Transfer Station is designed to receive and bulk household waste and recycling for onward transfer to other appropriate waste facilities where it will be further processed. 	<p>Figure 61 with respect to the Waste Transfer Station will be corrected.</p> <p>The comments made in relation to the DHN are noted and it is agreed that further work will be required to enable delivery.</p>	<p>The text accompanying Figure 61 be amended as follows:</p> <p>Figure 61 LB Barnet waste handling facility provides refuse derived fuel for Brent Cross Town DHN. <u>designed to receive bulk and household waste for recycling.</u></p>

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			<ul style="list-style-type: none"> The aspiration to deliver a District Heating Network (DHN) is noted that can be connected to the Barnet DHN. Two connection options are suggested, both of which present various delivery challenges. As noted in the document, this will require further assessment and engagement with the relevant stakeholders, including Barnet Council, to review the viability and feasibility of making these connections. 		
S09-03	Barnet Council	9. Infrastructure, Sustainability & Energy	<ul style="list-style-type: none"> Notwithstanding the administrative boundary between the two growth areas, there is a need to take a comprehensive and holistic approach to the character of development along the Edgware Road and to secure the infrastructure necessary to support the level of planned growth as well as achieve good place-making. To achieve this there will need to be close coordination between Brent Council and Barnet Council to ensure that masterplanning for the two areas is coordinated both in terms of proposed development and the delivery of supporting infrastructure. It will be important for development coming forward in the Staples Corner Growth Area to take the consented development at Brent Cross Town into consideration in cumulative assessments. 	<p>Noted and agreed. Please refer S09-01 above.</p> <p>In relation to Brent Cross Town, it should be noted that the Transport Study has taken this consented development into account.</p>	No proposed change.
S10-01	Transport for London	Appendix C-Guidance documents	<ul style="list-style-type: none"> It would be beneficial to refer to London Cycling Design Standards (LCDS) and TfL's Cycling Quality Criteria in Appendix C. 	Noted. It is recommended these be added.	<p>Appendix C, under Movement and Connectivity add:</p> <p><u>London Cycling Design Standards (LCDS)</u></p>

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					<u>TfL's Cycling Quality Criteria</u>
S10-02	Transport for London	Walking and Cycling Strategy – North Circular Road	<ul style="list-style-type: none"> Whilst the principle of improving pedestrian links to support in overcoming severance is supported, any new crossings on or over the A406 will need to be discussed with the appropriate TfL departments, with relevant work such as, but not limited to, robust modelling exercise and safety assessments. TfL is unable to commit to funding Improvements. For any pedestrian bridges which are to cross the A406 consideration will need to be given to clearance above the road. 	Noted.	No proposed change.
S10-03	Transport for London	Figure 72: Walking and Cycling Strategy – A5 Edgware Road	<ul style="list-style-type: none"> The SPD includes a proposal for a new pedestrian and cycle crossing over the A5 to create direct route to Brent Cross West Station, the exact form and location of this crossing will need to be determined through further work, including bus journey impacts. Throughout the proposed SPD there are several references to creating cycle infrastructure along Edgware Road. It is not entirely clear what the Council is proposing in this area i.e. the illustrative material indicates a two-way cycleway on the western side of Edgware Road whereas Figure 72 indicates cycling facilities on the flyover, nor is it clear how such facilities will tie in with the existing cycling network. 	<p>Noted.</p> <p>In terms of the provision of a two-way cycle route to the western side of Edgware Road, this was considered appropriate given the split management responsibility with LB Barnet and officers felt the aspirational sections should only focus on LB Brent owned land. This idea was tested along with an aspiration to reconfigure the existing A5 flyover to include a two-way cycle route as part of more detailed work undertaken by transport planners and engineers at Alan Baxter Associates.</p> <p>It should be made clear, however, that Figure 72 does not illustrate a fully resolved proposal and should therefore be re-labelled.</p>	<p>Figure 72 label to read as follows:</p> <p><u>A5 flyover as it might be incorporating cycle infrastructure.</u></p>

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S10-04	Transport for London	General	<ul style="list-style-type: none"> There may be benefits in working with Barnet Council to ensure a joined-up approach to tackle challenges such as severance from major road and rail corridors. It may also be beneficial to identify this growth in additional visualisations within this SPD, rather than just in Maps 91-93. 	<p>Noted. Regular co-ordination meetings have taken place with LB Barnet and these will continue as development proposals come forward.</p> <p>LB Barnet growth is not shown in the CGI visualisations as the VuCity 3D model did not reflect the final approved form and massing of buildings, and so would not have been accurately depicted.</p>	No proposed change.
S10-05	Transport for London	Chapter 7 Design Codes	<ul style="list-style-type: none"> The preferred minimum lane width for a bus is 3.2m on a straight alignment. However, road widths between 3.2m and 4m should be avoided as this creates indecision areas. Areas where this is specifically mentioned in the document include M.03.B, M.06.B, M.08.B. 	This response refers to design codes in the draft Design Code consulted on in 2023 that have since been superseded.	No proposed change.
S10-06	Transport for London	Figure 40: Walking and Cycling Strategy and 11.3 CIL/S106 Planning Obligations	<ul style="list-style-type: none"> Whilst the principle of improving bus infrastructure is welcomed and in line with Policy T3, any improvements must be discussed in consultation with TfL. Figure 40 of the SPD shows how public realm, cycling and pedestrian improvements will be made on Coles Green Road, there is no consideration for how bus assets such as stops, flags and shelters will be incorporated into this design. SPD refers to bus service frequency to be increased to meet demand from increased activity in the masterplan area. To improve bus frequency, we are likely to need bus reliability protected, developer contribution, and support for bus infrastructure. 	<p>Noted regarding the consultation and discussion regarding bus infrastructure with TfL.</p> <p>Figure 40 does not represent final proposals and it is not within the scope of this SPD to produce a detailed design for Coles Green Road. However, it would be helpful for this SPD to signpost to the relevant TfL guidance.</p> <p>Similarly on the likelihood of requiring developer contributions and support for bus infrastructure. Whilst this is covered by the Brent's Planning Obligations Supplementary Planning Document (2022), it is felt that some additional wording</p>	<p>Section 11.3 CIL/S106 Planning Obligations, to add the following wording be added at the end of paragraph 11.3.1:</p> <p><u>This may include developer contributions to support bus infrastructure.</u></p> <p>A caveat note to be added to Figure 40 and other similar illustrations that cover streets with bus services to read as follows:</p> <p><u>Any improvements to streets accommodating bus routes must be designed in accordance with the relevant TfL guidance.</u></p>

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				should be added to Section 11.3 CIL/S106 Planning Obligations.	
S10-07	Transport for London	3.1 Service and Movement Strategy	<ul style="list-style-type: none"> TfL is the highway authority for the North Circular Road and any amendments to its junction must be agreed with TfL. Map 8 (now Map 9) indicates a one-way service strategy for vehicle routes. It is not clear whether this will impact on bus operations. 	Noted. The separate Transport Study will address these matters. TfL have been regularly briefed on the progress of this study and this will continue until it is finalised.	No proposed change.
S10-08	Transport for London	Front cover	<ul style="list-style-type: none"> The image on the cover, and other images show the proposed development massing on the Brent side but nothing on the Barnet Brent Cross West side. 	Please refer to S10-04 above.	No proposed change.
S10-09	Transport for London	1.6 Location, Map 1	<ul style="list-style-type: none"> TfL questions whether the WLO should be labelled on this map given it is not an existing service. 	<p>Noted. This label can be removed.</p> <p>Noted. WLO to be retained on diagram but renamed "Proposed West London Orbital."</p>	<p>Map 1: Location of Staples Corner in London Borough of Brent to be amended as follows:</p> <p><u>Proposed</u> West London Orbital.</p>
S10-10	Transport for London	2.1 West London Orbital	<ul style="list-style-type: none"> It is noted that Paragraph 2.1.1 refers to the Mayor's Transport Strategy 2018. It is suggested that an additional sentence along the lines of - "Brent Council is working with the West London Alliance of boroughs and Transport for London to develop the scheme further and move it forward towards delivery in the early 2030s" - is added to this section. 	Noted. This can be added.	<p>Paragraph 2.1.1, add the following sentence at the end:</p> <p><u>Brent Council is working with the West London Alliance of boroughs and Transport for London to develop the scheme further and move it forward towards delivery in the early 2030s.</u></p>
S10-11	Transport for London	2.1 West London Orbital, Map 5 – West London Orbital Proposed Route	<ul style="list-style-type: none"> There are a range of issues with Map 5 which need to be addressed: The geographical positioning of the WLO route and its stations looks correct in relation to the borough boundaries. 	These errors are noted and will be corrected, as described in the following column.	Map 5: West London Orbital Proposed Route (Mayor's Transport Strategy 2018) to be corrected as follows:

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		(Mayor's Transport Strategy 2018)	<p>However, there are issues with the positioning of two other points on the map. The HS2 station at Old Oak Common is shown quite far to the west of the WLO station when in fact HS2 is to the east. The Bakerloo Line/existing Overground station at Harlesden is just to the west of the WLO station, not to the east.</p> <ul style="list-style-type: none"> The WLO station at Old Oak Common should be called 'Old Oak Common Lane' to differentiate it from the HS2/Elizabeth line station. The HS2 station should also have Elizabeth line and National Rail logos. West Hampstead station is mis-spelt and should probably be labelled 'West Hampstead Thameslink' for clarity. The brown lines represent 'Existing West London Overground line' according to the key. However, what is shown is a selection of other existing London Overground lines, not just the West London Line. The simplest way to present this consistently is probably to add the existing London Overground route between Willesden Junction and Richmond, which is missing, and change the key to refer to 'Existing London Overground lines.' 		<ul style="list-style-type: none"> HS2 station – relocate to the east of the WLO. Bakerloo Line / existing Overground station at Harlesden – relocate to the west of the WLO Rename WLO station from Old Oak Common to Old Oak Common Lane. The HS2 station – to also include Elizabeth line and National Rail logos. Correct spelling of West Hampstead station is mis-spelt and label as 'West Hampstead Thameslink' for clarity. Add the existing London Overground route between Willesden Junction and Richmond to the map Change the key to refer to 'Existing London Overground lines.'
S10-12	Transport for London	3.1 Movement	<ul style="list-style-type: none"> For the existing PTAL diagram has Brent Cross West station been included noting that it is now open and operational? 	No, the Existing PTAL diagram is pre the opening of the Brent Cross West station. TfL's point is noted. This diagram is no longer needed now that Brent Cross West is open and thus can be deleted.	Section 3.1 Movement:: Delete the Existing PTAL diagram.
S10-13	Transport for London	3.1 Movement, Map 7 (now Map 8)	<ul style="list-style-type: none"> As noted throughout this response, further discussion with the relevant highway and 	Noted regarding the consultation and discussion with the relevant highway and traffic authorities and the requirement for a	No proposed change.

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			<p>traffic authorities about proposals will be required.</p> <ul style="list-style-type: none"> It is noted that A) seeks to improve connections to the Strategic Road Network - any direct new connections to or access onto the A406 or A5 or changes to service road directly fronting them will need to be approved by TfL and may need to be subject to a full road safety audit and modelling work. 	<p>full road safety audit as well as modelling work.</p>	
S10-14	Transport for London	3.5 Activation Strategy- Aims	<ul style="list-style-type: none"> Consideration could be given to slight amendment to wording: 'A) Create active and, safe and <u>perceived to be safe</u> routes connecting train stations, amenities (including retail facilities at Brent Cross Shopping Centre and Brent Cross Town) and local neighbourhoods during the day and night. 	<p>This can be amended in line with TfL's suggestion.</p>	<p>Map 20: Activation strategic aims diagram, to change the description under A) as follows:</p> <p>A) Create active and safe and <u>perceived to be safe</u> routes connecting train stations amenities (including retail facilities at Brent Cross Shopping Centre and Brent Cross Town) and local neighbourhoods during the day and night.</p>
S10-15	Transport for London	3.3 Public Realm Strategy, Map 16 (now Map 17)	<ul style="list-style-type: none"> The references to Edgware Road could be clearer, in relation to the plan. For example, number 4 relates to active ground floor uses but it is not clear where this refers to. In addition, number 5 of this strategy refers to cycling infrastructure on the A5 – the number of plan is only on Staples Corner so it is not clear whether it is only in this location or along all of Edgware Road. 	<p>Noted. It is agreed that the references to both number 4 and number 5 on the plan could be made clearer.</p>	<p>Section 3.3 Public Realm Strategy, Map 16 (now Map 17) to extend the references to number 4 and 5 to along the Edgware Road corridor.</p> <ul style="list-style-type: none"> Extend no. 4 along the Edgware Road. Extend no.5 along the Edgware Road

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S10-16	Transport for London	3.6 Green and Blue Infrastructure Strategy, Map 22 (now Map 23)	<ul style="list-style-type: none"> From the submitted document, it is not clear what a landscape buffer for the A406 and A5 would mean in practice – this could more helpfully be described in different terms, eg linear landscape features introduced through redevelopment (if that is what is meant). On Map 22, it is also not clear what is meant by ‘soften against breeding edge’. 	Noted. The landscape buffer key can be expanded to include more detail.	Green and Blue Infrastructure Strategy Map 22 (now Map 23), to amend the key as follows: <u>Landscape buffer such as SuDS and other linear landscape features.</u>
S10-17	Transport for London	4.3 Working Assumptions	<ul style="list-style-type: none"> Total number of parking spaces is 550. It is useful to highlight that several of the areas identified for residential development are identified in proximity to Brent Cross West Station and bus services, as such car-free development is a realistic option for residents and/or visitors of the proposed development. 	Noted. This can be highlighted in the document to refer to car free development.	Chapter 4.3 Working Assumptions to be amended as follows, under car parking to add: <ul style="list-style-type: none"> <u>Car free residential development in relevant locations in line with the Local Plan.</u>
S10-18	Transport for London	3.1 Movement, Map 7 (now Map 8)	<ul style="list-style-type: none"> It would be beneficial to show Brent Cross LU station on the map. 	It is not felt that including Brent Cross LU station is necessary on Map 8 as no other stations or lines are marked on it.	No proposed change.
S10-19	Transport for London	9.1 Figure 63	<ul style="list-style-type: none"> Noting Brent Cross West Station is open and operational, is there a figure which could be used which does not show it still under construction. 	A new photograph will be added to show the now completed Brent Cross West station.	Figure 63, to substitute with a new photograph of the now completed station.
S10-20	Transport for London	8.1 North Circular Road	<ul style="list-style-type: none"> The drawings are aspirational, and are clearly labelled as such, but there may still need to be some explanation. For example, some visualisations show a planted verge between carriageway and footway, but others show a footway between the planting and the carriageway. 	A coordination meeting between TfL and LB Brent took place on 24th January 2024. Further clarity on the ambitions of the Design Code was provided by LB Brent officers and the street section drawings were agreed in principle.	No proposed change.

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			<ul style="list-style-type: none"> The implication, although not spelled out, is that both are equally acceptable. On SUDS, it is not clear on the purpose of the buffer zone and who will be responsible for its long term maintenance. The buffer zone shouldn't encroach into the existing highway, or any additional land TfL would require to maintain the highway. The proposed green estate in the central reserve would be hazardous for TfL contractors to maintain in the long term, so the type of green estate that could be accommodated here needs to be carefully considered. 	<p>For the avoidance of doubt, no changes are proposed to the North Circular Road within the highway boundary beyond the suggestion of planting to the central reservation. Concerns over the safety of TfL contractors maintaining planted central reservations are understood and these have been omitted from the street section drawings.</p>	
S10-21	Transport for London	8.2 Edgware Road	<ul style="list-style-type: none"> It would be useful to caveat Figure 31, the aspirational street section, with a note about flexibility of the arrangement. For example, doubling-up on the footway on the western side with the two parts separated by a planting and furniture zone, is an acceptable way of arranging the public realm, but it should be made clear that it is not the only way. (The same comment applies to the section on Humber Road, pages 138-139.) Likewise, it should be clear that the carriageway width is indicative, rather than a minimum. Given the indicatory requirement M.05.EWR, it may be more helpful to set out minima or a range for carriageway width rather than stating 7.4m for two lanes. As highlighted above, a number of bus services operate along Edgware Road. Appropriate carriageway widths which maintain safe and efficient bus operations should be ensured. 	<p>A coordination meeting between TfL and LB Brent took place on 24th January 2024. Further clarity on the ambitions of the Design Code was provided by LB Brent officers and the street section drawings were agreed in principle.</p> <p>Clearer labelling and caveats included to clarify that all aspirational sections for all streets in the Design Code are an indicative way of reallocating space and do not represent final proposals.</p> <p>The provision of a two-way cycle route to the western side of Edgware was considered appropriate given the split management responsibility for Edgware Road and officers felt the aspirational sections should only focus on LB Brent owned land.</p>	<p>A caveat note to be added to Figure 31 and other similar illustrations to read as follows:</p> <p><u>Please note this illustration shows one example of how the streetscape could be improved and, along with the carriageway widths, is indicative only.</u></p>

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			<ul style="list-style-type: none"> The illustration shows trees that obscure traffic signals and reduce visibility between bus passengers and bus drivers. 		
S10-22	Transport for London	9.2 Infrastructure Projects	<ul style="list-style-type: none"> Sitewide bus stop/lane improvements have also been identified, but no detail has been provided on these proposals. TfL involvement will be required. 	Noted.	No proposed change.
S10-23	Transport for London	10.5 Public Realm and Infrastructure Delivery	<ul style="list-style-type: none"> More exploration of funding mechanisms for delivery of the infrastructure projects would be beneficial. Has any consideration been given to a phasing plan for when the walking and cycling improvements will be needed? A reference to developer contributions being used towards the WLO would be useful. 	New Section 9.7 Transport Mitigation to be added to the draft SPD which set out detail on funding mechanisms and mitigations for infrastructure. A reference to in principle support for the use of developer contributions towards the WLO has been noted.	Please refer to new section 9.7 Transport Mitigation where some additional detail on the delivery of infrastructure projects has been set out, including in principle support for securing contributions towards the WLO.
S11-24	Brent & Westminster Swifts Group	7.1 Design Codes – Nature	<ul style="list-style-type: none"> In summary, please include swift bricks or bird bricks in accordance with best-practice guidance in new developments in the Staples Corner Growth Area. Swift bricks are not just for swifts, they are a universal nest brick for small bird species and supported by national, London and Brent planning guidance. The National Model Design Code Part 2 Guidance Notes (2021) also clearly recommends bird bricks in multiple sections of the document - however, there doesn't seem to be anything about nesting provision in the current Staples Corner SPD documents. Reference to nesting provision appears to have been removed - most bird species 	Noted – whilst important, it is considered to be too specific for this place based document and would necessitate that similar detailed guidance be provided for other relevant species.	No proposed change.

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			<p>cannot nest in "green infrastructure" until it has matured after many decades.</p> <ul style="list-style-type: none"> The National Model Design Code Part 2 Guidance Notes (2021) also recommends bird bricks (Integrating Habitats section on page 25, and Creating Habitats section on page 26). The Brent Sustainable Environment & Development SPD (June 2023) makes several references to the importance of swifts and swift bricks, in particular highlighting that they are excluded from the Biodiversity Net Gain metric (see sections 3.5.1, 3.5.3, and 3.6.6 (d)). 		
G01-01	Brent Cycling Campaign	3.1 Walking and Cycling Strategy	<ul style="list-style-type: none"> High quality cycle infrastructure must be implemented now, with this development, otherwise the potential of these routes and this development will be failed and Brent residents will face another 40 years of danger. Key cycle infrastructure is needed in the area. 	Noted and agreed that key cycle infrastructure is needed in the area.	No proposed change.
G01-02	Brent Cycling Campaign	1.4 Challenges	<ul style="list-style-type: none"> 1.4: Misses the current danger imposed for pedestrians and cyclists by the current and surrounding infrastructure. 	Paragraph 1.4 does note " <i>The area is dominated by highways infrastructure, that is heavily trafficked and polluted, and presents a hostile environment, particularly for pedestrians and cyclists</i> ". No change is considered necessary.	No proposed change.
G01-03	Brent Cycling Campaign	3.1 Walking and Cycling Strategy	<ul style="list-style-type: none"> Walking and Cycling Strategy is welcome. If all solid green routes are protected cycle infrastructure this would become the best-connected cycling infrastructure in Outer North or West London. 	Noted.	No proposed change.

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G01-04	Brent Cycling Campaign	3.3 Public Realm, Map 15 (now Map 16)	<ul style="list-style-type: none"> Strategic aims - Public Realm, Map 16 it is completely wrong to claim LCN 85, LCN 49, LCN 5, etc as “Major routes”: these fail modern design standards and are inadequate as you show on page 40. 	It is recommended to amend the labelling on Map 16 to delete reference to “Major” and substitute the word with “Important”.	To amend the key to Map 16: Public realm strategic diagram on page 44 as follows: <u>Important</u> Major routes - pedestrian and cycle
G01-05	Brent Cycling Campaign	General	<ul style="list-style-type: none"> A significant problem with the document is the lack of any concepts at all, suggested or even indicative, of how the desired ‘high quality network of walking and cycling routes’ could co-exist with the existing gross engineering of the Staples Corner West road junction, with its two levels of flyovers, multiple high-speed approach planes and slip roads and central barriers. 	Chapter 8 Design Code C: Streets has been prepared to show how the street focussed design codes, which relate to the importance of delivering active travel infrastructure, including cycling provision, could be delivered with the Staples Corner flyovers, central barriers and slip roads intact. These include existing and aspirational sections through the roads with the SCGA. Computer Generated Images have also been prepared indicating the form these could take and are included on pages 118 (North Circular Road), page 125 (Edgware Road), page 128 (Oxgate Lane) and page 135 (Coles Green Road). Hence, no changes are considered necessary.	No proposed change.
G01-06	Brent Cycling Campaign	General	<ul style="list-style-type: none"> The Masterplan would be far more convincing if solutions that had been used in other locations that had similar issues in the past were referenced, for example, the removal of Bristol’s high-speed ring-road from its city centre at George Square, or the demolition of the Belgrave flyover in Leicester. 	The inclusion of the removal of Bristol’s ring road and the demolition of the Belgrave flyover would be misleading, since the removal of the existing Staples Corner highway infrastructure does not form part of the masterplan strategy, being located outside of the SCGA boundary and requiring significant transport investment and junction remodelling. Therefore no changes are recommended here.	No proposed change.

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G01-07	Brent Cycling Campaign	7 & 8 Design Codes	<ul style="list-style-type: none"> • 7.1, C.01, M.01, M.02, P.01, in particular M.01: Strongly support this emphasis on mandatory codes for cycle provision. However; this is insufficient, and the proposals to meet this are clearly inadequate to meet M.02 (Healthy Streets), London Cycle Design Standards (LCDS), and Cycle infrastructure design (LTN 1/20). • 1.01.EWR etc. As mentioned above, the proposed character and identity of Edgware Road is discordant with existing gross road infrastructure to which no changes are proposed. Fig 33. 'View of Edgware Road as it might be' has been drawn for a point just outside Brent Cross West Station, because it could not be drawn for a point 100m to the north, where there would be no view across the 'Broadway' as buildings would front on to the concrete wall under the A5 flyover. How this 'Broadway' with its 'active frontages' is supposed to function for the new residents in the 500m south of the A406 is unclear. • M.02.NCR: shared space for pedestrians and cyclists is inadequate and fails to meet local, London, and National standards: M.02, P.01, LCDS, LTN 1/20. Dedicated separate cycle and pedestrian space must be given on main roads. • M.04.EWR: This is promising and 4 metres width two-way protected space for cycling meets current future-proofed design standards (LTN 1/20). This must be upgraded to "must". • M.04.OGL: Given figure 36 space is clearly present for a 4.0 metre wide protected 	<p>LCDS recommendations have informed the indicative widths of all cycle routes shown in this SPD, based on the estimated flow categories set out in figure 4.12.</p> <p>Figure 33 illustrates Edgware Road as it might be where mixed-use development is planned to come forward in the Illustrative Masterplan. The A5 flyover starts approximately 300m south of the A406 and much of the land in this area is planned for industrial intensification. Figure 34 shows that, despite the presence of the flyover, it is possible to create an active frontage to Edgware Road and the design of both the streetscape and building facades will be key here.</p> <p>At present, the widths of cycle routes set out in the design codes referenced are based on the estimated flow categories set out in figure 4.12 of the LCDS – these may change over time and flexibility is required here to ensure that detailed proposals for cycle infrastructure respond to future demand, as it is envisaged at any such time. As such, the use of 'should' is felt to be sufficient at this stage.</p>	No proposed change.

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			<p>cycle lane to meet future proofed design standards. This must be upgraded to “must”. Example given in Figure 37 will not be met at 3.0 m width because there will be insufficient space for cargo cycle use.</p> <ul style="list-style-type: none"> • M.04.CGR: 3.0 m is the minimum acceptable for CGR. This must be upgraded to “must”. • M.04.HBR: No specific comment. A motor vehicle one-way system could be considered to provide space for safe cycle infrastructure. • M.07.WLR: We support the addition of a cycle contraflow; however, 1.5 m is insufficient for an unprotected route. This must be protected. Non-contraflow lane widths and PCUs must meet LTN 1/20 if cycles and motor vehicles are to share space. This must be upgraded to “must”. • M.09.WLR, M.11.WLR: As above shared space for pedestrians and cyclists is inadequate and fails to meet local, London, and National standards. • M.02.AWB: This is excellent and we strongly support this proposal for improved connection. As above shared space for pedestrians and cyclists is inadequate. • M.08.AWB: As above shared space for pedestrians and cyclists is inadequate and fails to meet local, London, and National standards. • M.09.AWB: 3.0 m is the minimum acceptable for Brook Road. Given that this is expected to connect to an existing cycle route enhanced infrastructure is warranted. This must be upgraded to “must”. 		

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			<ul style="list-style-type: none"> EWS: We recognise the industrial nature of this route. Cycle parking must be mandated to allow end of journey options at businesses on this road. NSS: A new street is proposed. The new street must have high quality protected cycle infrastructure to LTN 1/20 (2x 1 way, >=2.5 m wide). Given this is new, space is clearly available. 		
L01-1	Related Argent	General	<ul style="list-style-type: none"> Related Argent and Brent Cross South Limited Partnership to be important local stakeholders in the development of the draft masterplan for the Staples Corner Growth Area (SCGA) SPD. It will be important for the parties to collaborate, particularly on transport and movement strategies and future connections between the two important growth and opportunity areas, as well as with the London Borough of Barnet in relation to their Brent Cross West (Staples Corner) Growth Area (between the two), to ensure a holistic approach to this part of north London. The draft SPD makes numerous references to Brent Cross Town, the new station at Brent Cross West and amenities such as Clitterhouse Playing Fields, particularly in the context of improved connections. It will be important for development coming forward in the SCGA to take development at BXT into consideration in cumulative assessments and, for example, underlying transport and programme assumptions. 	<p>Noted and agreed with respect to collaboration. This has been ongoing and will continue as development proposals come forward.</p> <p>In relation to Brent Cross Town, it should be noted that the Transport Study has taken this consented development into account.</p>	No proposed change.

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L02-1	Landowner – 150b Coles Green Road	8.4 Coles Green Road	<ul style="list-style-type: none"> Figure 42 shows this building is removed to make space for a park as well as a note with the following: “Landowners along Coles Green Road must work together with the council to deliver a new public space”. Your code explains the category implication of the word “must”. Would prefer the building to be retained and shown as hatched on the plan. 	Noted. The development capacity of the site is limited in isolation. As such, the site and its immediate neighbours on Coles Green Road are likely to come forward comprehensively to represent a viable development opportunity and to deliver the pocket park as P.01.CGR. However, no landowner is obliged to redevelop their site.	No proposed change.
L03-1	Iceni Projects Limited, on behalf of Dominion Mosaic and Tile Co. Ltd	General	<ul style="list-style-type: none"> Dominion owns 665 North Circular Road, London NW2 7AX and is in use by Dominion. Dominion request that the Council correctly identify their landholding and 661 North Circular Road as occupied on Map 30 of the Draft Masterplan. Dominion generally support for the Council’s vision to deliver industrial intensification including large stacked industrial units within the northern area of Staples Corner adjacent to the North Circular. Industrial intensification could be delivered through amalgamation of landholdings with the Staples Corner West sub area which is something that Dominion are currently exploring. Dominion welcome the opportunity to proactively and collaboratively work with the Council on the progression of the Masterplan and would welcome the opportunity to meet with the Council at the appropriate time. 	<p>Noted. Map 30 (now Map 31) is an existing ground floor plan of Sub Area 1: Staples Corner West. It does not seek to identify landholdings or ownership boundaries. No change is proposed.</p> <p>Comments in relation to proactively working and collaborating with the council are noted and appreciated.</p>	No proposed change.
L04-1	Rapleys, on behalf of Legal & General	4.6 Sub Area 3	<ul style="list-style-type: none"> Response submitted in connection with Unit 3, JVC Business Park, North Circular Road 	Noted. Light industrial uses are already shown in the Sub Area 3 Illustrative Masterplan. It is felt not appropriate to	No proposed change.

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	Investment Management (LGIM)		<ul style="list-style-type: none"> Request that light industrial uses and sui generis uses are included as appropriate uses for Sub Area 3. While LGIM supports the notion of intensification at Sub-Area 3, it considers that the reference to a specific quantum of proposed floorspace is unnecessary and overly prescriptive and reliant on a multi level solution which has viability implications. It is considered the proposed ramp could not only serve to constrain the floorspace that could be delivered at the Site, but it is also noted that the delivery of Phase 2 is to a large extent dependent on the delivery of this HGV ramp. If development in the eastern parcel was able to provide its own access for instance this problem could be avoided. 	<p>reference sui generis uses as this use class encompasses a very broad range of uses, each with its own very specific level of impact. Acceptability of sui generis use classes are best considered through the pre-planning and planning application process and on a case-by-case basis.</p> <p>References to floorspaces have been included to sit alongside the massing of the buildings shown in the Illustrative Masterplan and to demonstrate how industrial intensification can be achieved. The most preferred / most viable scenario forms part of the Illustrative Masterplan. There are many potential variations for how development could come forward across the SCGA, including variations on HGV ramp and access provision. Consideration of other typologies would not be precluded subject to aligning with the Spatial Strategies and Design Code, per the text in 5.1 Development brief sites.</p> <p>Based on the above, it is not felt necessary to make any changes.</p>	
L05-1	Rok Planning on behalf of Hashim Nawrozzadeh and Shakilla Nawrozzadeh and Bugler Group	1.1 Vision Statement & 3.2 Land Use Zoning Strategy	<ul style="list-style-type: none"> Representation relates to 150 Coles Green Road and has frontages on Coles Green Road and Waterloo Road. Strongly in favour of the Vision Statement, Land Use Zoning Strategy and the Green and Blue infrastructure strategy. A preliminary Design Document enclosed of a residential led development. 	<p>These comments are welcomed.</p> <p>The preliminary Design document is noted. However, detailed discussions per Brent's pre application service are recommended to discuss any proposed scheme (see 11.1 Pre-application discussions) of the document.</p>	No proposed change.

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L05-2	Rok Planning on behalf of Hashim Nawrozzadeh and Shakilla Nawrozzadeh and Bugler Group	3.7 Tall Building Strategy, Figure 23	<ul style="list-style-type: none"> The Landowners consider that tall building development should be acceptable in any locations within the Growth Area falling within the Brent Tall Building Zone. The Landowners respectfully suggest that the frontage of Coles Green Road within the Brent Local Plan Tall building Zone is included within the area noted as having “Greatest Potential for Tall Buildings”. 	<p>The Brent Tall Building Strategy 2020 identifies the tall building zone (Figure 23). The strategy states that tall buildings could be from six to 20 storeys.</p> <p>Further to the above, Local Plan Policy BEGA 2A Staples Corner states “As a transformational area it has been identified in the Tall Buildings Strategy with the potential for tall buildings of over 10 storeys. Appropriate heights, extent and location of these will be identified in the masterplan and more detailed townscape/ views assessment”.</p> <p>The Brent Tall Building Strategy is now considered superseded as noted in paragraph 8.39 of the strategy: “Masterplanning work will be undertaken to establish suitable development forms and heights”.</p> <p>The Illustrative Masterplan has determined that the tallest buildings are appropriate in the areas adjacent to the emerging Brent Cross West development, particularly along the Edgware Road close to Brent Cross West Station and Brent Cross Town, where the public transport accessibility level is the highest. But also that building heights should respond sensitively to the suburban, low density streets to the south. This approach has been followed and is reflected in Map 62: Overview of Illustrative Masterplan and indicative number of storeys – Option 1.</p>	No proposed change.

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				<p>Based on the above, it is not felt necessary to include the frontage of Coles Green Road within the area as having the greatest potential for tall buildings.</p>	
L05-3	Rok Planning on behalf of Hashim Nawrozzadeh and Shakilla Nawrozzadeh and Bugler Group	4.2 Illustrative Masterplan	<ul style="list-style-type: none"> In the case of the industrial designated land on the western part of the Coles Green Road Site, this results in an overly restrictive designation and request a more flexible industrial use designation. On the eastern part of the site, request an amendment to show this area as suitable solely for C3 residential use (rather than Class E at ground). The positioning of open space on the site is unnecessarily restrictive and would harm viability. 	<p>The western part of the Coles Green Road site fronts onto Waterloo Road. The industrial use designation reflects the cluster of other industrial uses shown in this location and accordingly it is not felt necessary to change it. If the landowner wishes to bring forward a light industrial scheme, then this would not necessarily be precluded, subject to complying with the text in 5.1 Introduction, where a requirement to comply with the Spatial Strategies and Design Code is specified.</p> <p>On the eastern part of the site, the Class E use shown at ground reflects the provision of local services that are required to support the growth area. It is also noted that there is an existing café, known as the Bellissima Ristorante in this location.</p> <p>Open spaces and green infrastructure are proposed in a number of locations in the SCGA and seek to address the open space deficiency in the area. The introduction of new open spaces will have a positive impact on future development, as well as for residents and businesses.</p>	No proposed change.
L05-4	Rok Planning on behalf of Hashim Nawrozzadeh and	4.3 Working Assumptions	<ul style="list-style-type: none"> 50% affordable housing delivery is in excess of the 35% target set out in London 	The 50% affordable housing delivery aligns with the Local Plan Policy BH5 Affordable Housing strategic target of 50%.	4.3 Working Assumptions to be amended as follows:

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	Shakilla Nawrozzadeh and Bugler Group		<p>Plan Policy H5: Threshold Approach to Applications.</p> <ul style="list-style-type: none"> Also request an amendment to the tower heights assumption as this relates to a typical C3 residential use rather than other C Class uses. Additionally, the tower heights referenced – 6-10 storeys with a maximum of ten storeys – are inconsistent with the definition of tall buildings found in the Brent Tall Building Strategy and referenced earlier in the document in the section determining the potential for increased density. Should be made clear that make CLT construction is merely a suggestion for enhanced sustainability rather than a design guideline. 	<p>Local Plan Policy BEGA2A Staples Corner Growth Area sets out the requirement for Staples Corner to deliver around 2,200 homes (Class C3), rather than any other type of Class C use. Based on this, it is not considered necessary to make any changes. The acceptability of other types of Class C use will be determined on a case by case basis.</p> <p>Noted on the tower heights, this can be amended.</p> <p>In relation to CLT construction, please refer to S02-8 above, where it is proposed this be deleted.</p>	<p>Towers</p> <ul style="list-style-type: none"> 6-10 storeys for 1+2B apartments with duplexes at ground floor. <u>Up to 31 storeys with up to 8 flats per core.</u>
L05-5	Rok Planning on behalf of Hashim Nawrozzadeh and Shakilla Nawrozzadeh and Bugler Group	4.9 Sub Area 6, Apsley Way	<ul style="list-style-type: none"> Co-location should be expanded to include co-location with C-Class quasi-residential uses. Additionally, the Landowners would seek an amendment to the references to maximum heights of six storeys in relation to residential accommodation on Coles Green Road – to up to a minimum of 10 storeys, and the CGI amended. 	<p>Noted.</p> <p>Please refer to L05-4 above on Class C uses.</p> <p>Please refer to L05-2 above on building heights.</p>	No proposed change.
L05-6	Rok Planning on behalf of Hashim Nawrozzadeh and Shakilla Nawrozzadeh and Bugler Group	7 Design Code B: Area	<ul style="list-style-type: none"> All development proposals classed as 'major development' must be reviewed at least twice by both the Brent Quality Review Panel (QRP) and Community Review Panel (CRP), with the review format to be agreed with the council on a case-by-case basis. 	<p>This is considered to be the minimum level of independent scrutiny required for 'major development' based on the council's existing approach. However, schemes are brought before both the QRP and CRP in consultation with officers to ensure they are timely, effective and proportionate to the scale and type of development proposed.</p>	No proposed change.

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			<ul style="list-style-type: none"> The Landowners consider that this requirement is onerous and would place unnecessary costs on developers. 	<p>If entering into a planning performance agreement (PPA), QRP and CRP meetings will be agreed in principle as part of the overall schedule of pre-application meetings, and this is assessed on a case-by-case basis. As such, the wording of L.05 is considered to be sufficiently clear and flexible.</p>	
L05-7	Rok Planning on behalf of Hashim Nawrozzadeh and Shakilla Nawrozzadeh and Bugler Group	Design Code C: Streets	<ul style="list-style-type: none"> The following points, when taken in combination, have the potential to limit the developable area of the Coles Green Road Site, resulting in a less efficient use of land: M.01.CGR, M.04.CGR, N.02.CGR, N.03.CGR and B.01.CGR. Suggest requirements downgraded from “must” to “should”. Clarification required on: P.01.CGR Landowners along Coles Green Road must work together with the council to deliver a new public space. This is not supported. I.03.WLR is considered unnecessary and impractical. 	<p>Noted. The dimensions set out in the design codes referenced are considered the minimum to deliver the required improvements to the Coles Green Road streetscape. The impact of these on individual sites has not been tested in detail, but it is acknowledged that these may be difficult to deliver and, as such, they may need to be negotiated, in some cases. Regardless, any development proposals are best considered through the pre-planning and planning application process and on a case-by-case basis.</p>	No proposed change.
L05-8	Rok Planning on behalf of Hashim Nawrozzadeh and Shakilla Nawrozzadeh and Bugler Group	10. Delivery approach and phasing	<ul style="list-style-type: none"> Strongly support the phasing plan and agree that the Coles Green Road Site is both suitable for development in Phase 1 and deliverable within that timeframe. It is noted that a series of smaller plans on pages 183 and 184 appear to show industrial development on a small portion of the east part of the Coles Green Road Site. Given that this is inconsistent with every other part of the Draft SPD, and is not reflected by any supporting text, it appears that this may be an error. 	<p>These comments are welcomed.</p> <p>Maps 83, 84 and 85 to be amended to delete illustration of the small portion of industrial development shown on the east part of the Coles Green Road. It is agreed these are errors. Maps amended to match Map 46 which show residential and café / retail here.</p>	<p>Amendments to maps 83, 84 and 85 (now maps 85, 86 and 87) to:</p> <ul style="list-style-type: none"> Delete blue shaded industrial area shown on the east part of the Coles Green Road. Maps amended to match Map 45 (now Map 46) which show residential and café / retail.

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L05-9	Rok Planning on behalf of Hashim Nawrozzadeh and Shakilla Nawrozzadeh and Bugler Group	Part 9: Infrastructure Sustainability & Energy	<ul style="list-style-type: none"> The East-West Active Travel Connection should not be allowed to minimise the potential for development on sites along its route. 	Noted.	No proposed change.
L06-01	Iceni Projects Limited on behalf of Wing Yip	General	<ul style="list-style-type: none"> Wing Yip are supportive of the Council's ambitious overall long-term vision for the Staples Corner Growth Area and see their landholdings as being strategically significant to help deliver upon the Council's vision for the area. Being able to develop an early phase along the key Edgware Road frontage would act as a substantial mixed use catalyst and kick start for this phase of the masterplan. Wing Yip wish to retain flexibility across their whole landholdings to deliver a new superstore and / or smaller retail stores across any ground and podium level commercial spaces delivered as part of any redevelopment. Design document is enclosed with this representation which includes a preferred 'Wing Yip Masterplan and Vision' for their Landholdings which are considered to be deliverable. 	<p>These comments are welcomed. LB Brent agree that the Wing Yip is a key landowner and the importance of their strategic land holding is recognised.</p> <p>The bringing forward of an early phase along the frontage of the Edgware Road aligns with the Site 3 Alternative Scenario on page 101.</p> <p>LB Brent understands that Wing Yip wish to retain flexibility to deliver a new superstore and / or smaller retail stores and to this end has developed an Option 2 Illustrative Masterplan on page 64 which shows provision of a replacement store on their Oxgate Lane landholding, should that be a scenario that the Wing Yip wish to explore.</p> <p>The enclosed Design document is noted. However, detailed discussions per Brent's pre application service are recommended to discuss any proposed scheme (see 11.1 Pre-application discussions) and the design document.</p>	No proposed change.

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L06-02	Iceni Projects Limited on behalf of Wing Yip	4.2 Illustrative Masterplan, North-South service route	<ul style="list-style-type: none"> The Council's Masterplan currently proposes a new north-south pedestrian and vehicular spine route which would require the demolition of Wing Yip's superstore during an early phase of redevelopment. This is considered unnecessary and would result in a significant detrimental impact on Wing Yip's business. Wing Yip's draft Masterplan, therefore, seeks to propose an alternative phasing and delivery approach which allow the superstore to remain open for a much longer period and based on the re-alignment of this north south spine route to reflect the existing internal access and servicing road. 	<p>Noted. Wing Yip's business continuity concerns are acknowledged and have been considered in drawing up the draft Masterplan. Whilst Wing Yip's draft Masterplan is welcomed, it does present a number of strategic issues in relation to the placement of the open space which would not be in the optimum or desirable place to receive a new A5 pedestrian / cycle crossing. Their proposed alignment of the north – south spine route would compromise the servicing of the plots further to the south of their site.</p> <p>A phasing plan has been sent to the Wing Yip indicating how their store could remain in operation whilst a new store is constructed, with the north -south spine route not requiring any relocation. As above under L06-02, should the Wing Yip wish to discuss a proposed scheme, they are recommended to use the council's pre – application service.</p>	No proposed change.
L06-03	Iceni Projects Limited on behalf of Wing Yip	5.6 Retention of the Wing Yip Superstore in-situ until the last phase of redevelopment	<ul style="list-style-type: none"> Being able to keep the store open and deliver development around the superstore for as long a period as is possible prior to its redevelopment within later phases is critical. This includes the ongoing use and retention of the primary vehicular entrance points for customers and servicing vehicles (including HGV trucks) to service the Wing Yip store via Humber Road and Oxgate Lane. This must be retained through all phases of redevelopment, and the same or better access would need to be provided 	Please refer to L06-01 and L06-02 above.	No proposed change.

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			<p>for a new store. It is also important that the existing car parking provision for customers is retained for both the existing store and any future new store.</p>		
L06-04	Iceni Projects Limited on behalf of Wing Yip	5.6 Placemaking, public realm and connectivity	<ul style="list-style-type: none"> • Wing Yip's draft masterplan would see the delivery of two mixed use towers with podium buildings on their landholdings with ground floor commercial uses fronting the Edgware Road and a new public square. • An additional green open space would be provided to the rear of the northern tower building, providing a space which is protected and separated from the noisy Edgware Road. This is considered to be a betterment in placemaking from the Council's Draft Masterplan. 	Please refer to L06-01 and L06-02 above.	No proposed change.
L06-05	Iceni Projects Limited on behalf of Wing Yip	5.6 Appropriate phasing strategy within the existing leasing arrangements of the landholding	<ul style="list-style-type: none"> • The preferred phasing strategy is articulated in the enclosed design document, and would see: • Phase 1: the delivery of a significant high-density mixed-use development along Edgware Road. • Phases 2 and 3: These phases would include the delivery of high-density co-location development fronting Oxgate lane with podium commercial (which could accommodate a new Wing Yip Superstore) and light industrial uses with residential development above commensurate with the objectives of the Council's Draft Masterplan. • Phase 4: removal of the existing Wing Yip Superstore to be replaced with high-density mixed-use development. 	Noted. Please refer to L06-01 and L06-02 above. The phases as described in Wing Yip's design document broadly align with the indicative phasing as shown on Map 68 Landownership and phasing diagram.	No proposed change.

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			<ul style="list-style-type: none"> Flexibility in the commercial podiums fronting Oxgate Lane are requested should Wing Yip choose to relocate their business into one of these tenancies in the future. 		
L07-01	Turley Associates, on behalf of Goodman Real Estate	General	<ul style="list-style-type: none"> Goodman is the owner of Staples Corner Business Park, 1000 North Circular Road. Agree that the site has the potential for intensification including large-scale employment accommodation and multi-level typologies. We are pleased to see that this potential is acknowledged and supported by the Draft SPD which seeks to create a framework for such intensification. Pleased to see that the Draft SPD recognises the potential for a significant increase in height and massing on the Goodman Site. Strongly supports the decision to merge the Masterplan and Design Code. 	These comments are welcomed. The strategic significance of the Goodman site is recognised and the potential for it to deliver large scale industrial intensification is reflected in the Illustrative Masterplan.	No proposed change.
L07-02	Turley Associates, on behalf of Goodman Real Estate	Design Code Chapters 7 & 8	<ul style="list-style-type: none"> Several specific design codes would benefit from further revision or modification to avoid the potential for uncertainty and inconsistency (between the Draft SPD and the adopted Development Plan). 	Noted.	No proposed change.
L07-03	Turley Associates, on behalf of Goodman Real Estate	4.2 Illustrative Masterplan	<ul style="list-style-type: none"> It is imperative that the illustrative masterplan remain illustrative at this stage. This is to ensure that the Draft SPD provides for sufficient flexibility to enable future planning applications to adapt to changing business/market needs over the lifetime of the Masterplan. 	Noted and agreed. Per text in paragraph 4.1.2: - <i>“The Illustrative Masterplan demonstrates how a broadly acceptable scenario for development could come forward. It should not be read as a fixed masterplan because different acceptable scenarios – dependent on different design and delivery</i>	No proposed change.

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				<i>approaches – could be equally or more successful in fulfilling the policy objectives.”</i>	
L07-04	Turley Associates, on behalf of Goodman Real Estate	3.2 Land Use Zoning and Pages 38-39 and 3.7 Intensification / Optimising sites and Building Heights	<ul style="list-style-type: none"> Strongly support the identification of the Goodman site as a suitable location for tall buildings. The Goodman site presents a longer-term development opportunity, as it is currently fully let with redevelopment anticipated in 10+ years' time. 	These comments are welcomed.	No proposed change.
L07-05	Turley Associates, on behalf of Goodman Real Estate	3.1 Movement, Map 7 (now Map 8)	<ul style="list-style-type: none"> The precise location of the service loop appears to be inconsistent, as Map 7 (now Map 8) shows the loop passing through the Goodman Site, while Map 8 (now Map 9) shows the loop passing around the site. At this stage we object to the provision of a service loop through the Goodman site, as proposed by Design Codes M.01.EWS – M.07.EWS in Section 8.8 of the Draft SPD. Moreover, a new service loop will also adversely impact on the developable area and operational functioning for intensified industrial uses on the Goodman site, which would be contrary to one of the central elements of the overall vision for transformational change at Staples Corner. Accordingly, we recommend that the Service Loop is removed from Maps 7 (now Map 8) and 8 (9). Any future service loop proposal would need to be subject to further technical feasibility work and discussion with landowners. We would recommend that Design Code M.01.EWS is then re-worded as follows to align with this approach: “Feasibility work between the Council and landowners will consider 	<p>Noted.</p> <p>Map 7 (now Map 8) is a high level transport strategic aims diagram. Map 8 (now Map 9) should be more detailed and should be consulted with respect to the arrangement of the service loop, which passes along the southern boundary to the site.</p> <p>Goodman’s objections to the service loop passing through their site are noted.</p> <p>Delivering a service route will be critical to the functioning of the intensified industrial site as well as the wider SCGA in order to support the intensified industrial uses, noting the one way in and out vehicular restrictions along the Edgware Road and North Circular Road. The alternative to this service route would be a turning circle, which would be likely to impact on their developable area to a greater degree. It is not possible for Goodman to build right up to their southern boundary as this would prejudice development coming forward on adjacent sites as well as causing potential</p>	No proposed change.

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			<p>the potential for a servicing route must be provided between Coles Green Road and Edgware Road to enable the delivery of the East-West Service Route.”</p>	<p>residential amenity impacts to existing residential properties along Coles Green Road and Kelceda Close. Therefore, it is felt that the location of the service loop is in the optimum position, would not adversely compromise Goodman’s developable area and would serve to enable a wider SCGA movement strategy. The service loop would be subject to more detailed design and testing, per paragraph 4.1.7 on Design Limitations.</p> <p>Goodman are a strategic landowner in the SCGA, owning one of the largest sites. It is considered that key sites should contribute and deliver these infrastructure requirements and support the SCGA service strategy. No proposed change to the service loop is recommended.</p>	
<p>L07-06</p>	<p>Turley Associates, on behalf of Goodman Real Estate</p>	<p>3.3 Public Realm pages 41 and 43 (now pages 43 and 45).</p>	<ul style="list-style-type: none"> • The site is not considered to be a suitable location for a north-south local street. The site is considered to represent the most suitable location within the Growth Area to accommodate large-scale intensification typologies on account of its large size, excellent connectivity to the Strategic Road Network (‘SRN’), and relative lack of development constraints. • We therefore recommend that the local street is removed from the Public Realm Strategy Diagram set out on Page 43 and that a caveat is then added to clarify that all new streets and connections will need to be subject to thorough feasibility testing, including technical analysis, as part of the development management process. 	<p>Noted. This north-south local street would be on the alignment with the proposed north - south servicing street as well as the alignment of a proposed North Circular Road at grade crossing. Per paragraph 4.1.6 and 4.1.7, the Illustrative Masterplan has been subject to high level design development and testing. As schemes come forward for planning, more detailed design development and more detailed strategies and testing will be required. No proposed change is recommended.</p>	<p>No proposed change.</p>

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L07-07	Turley Associates, on behalf of Goodman Real Estate	4.2 Illustrative Masterplans and Parameters	<ul style="list-style-type: none"> Any references to specific parameters within the Draft SPD relating to height, layout or density should be clearly labelled as having been provided for illustrative purposes only. Stipulating a specific building height or density is too prescriptive at this stage in the regeneration process. Accordingly, we recommend that an “illustrative only” label is applied to the above pages. 	Please refer to L07-03 above.	No proposed change.
L07-08	Turley Associates, on behalf of Goodman Real Estate	Design Code: Area B – Identity and Use	<ul style="list-style-type: none"> Design Code U.01, which states that: “Development proposals must support the creation of a mixed community of workplaces, homes and social infrastructure through the delivery of industrial, residential and community uses, as set out in the masterplan.” The design code should be amended to clarify that while the overall masterplan area should create “a mixed community of workplaces, homes and social infrastructure through the delivery of industrial, residential and community uses,” individual development proposals themselves do not need to provide a mix of all such uses on specific sites. We would also recommend that Design Code I.01 (“Development proposals must respond to the industrial heritage and character of the Staples Corner Area”) is re-worded to confirm that it applies only to sites sensitive in heritage terms. 	<p>Map 14 in Section 3.2 clearly sets out the land use strategy and it is not felt necessary to add a caveat to U.01.</p> <p>I.01 is felt to be sufficiently open to interpretation and the industrial character of Staples Corner at present is as much established by contemporary large-scale sheds as it is by period brick warehouses.</p>	No proposed change.
L07-09	Turley Associates, on behalf of	Design Code: Area B – Resources	<ul style="list-style-type: none"> Eight design codes within Section 7.1 concern the use of resources. While our 	R.03 clearly sets out that reuse, adaptation and retrofitting must be explored as a first	No proposed change.

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION, PARAGRAPH OR PAGE NO	OFFICER SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
	Goodman Real Estate		<p>client is supportive of many of these aspirations (including the incorporation of circular economy principles), we remain concerned that several resource-related design codes – much like I.01 above – risk stifling the intensification and transformational change sought for the area by the Local Plan. For example, Design Code R.03 states that:</p> <p>"Opportunities for reuse, adaptation and retrofitting must be explored as a first approach to any and all development proposals."</p> <ul style="list-style-type: none"> • However, it is inappropriate for sites proposed for SIL intensification or those that are underutilised and/or coming towards the end of their lifetime. 	<p>approach, not that it must be delivered. It is intended to encourage applicants to undertake the appropriate assessments at the earliest stages of a project to explore alternative approaches to their sites.</p>	
L07-10	Turley Associates, on behalf of Goodman Real Estate	Design Code: Area B – Lifespan	<ul style="list-style-type: none"> • As a general comment, while Goodman are broadly supportive of the aspirations set out in Section 7.1, we disagree with the notion that its requirements should “apply to all sites, regardless of where they are located or the scale of development proposals.” Instead, we consider that the Draft SPD should make clear that various aspects of this section are only applicable to the co-location or residential-led elements. • Eg Design Code L.05 on QRP & CRP, these are likely to be less relevant for many industrial developments within the SIL where design considerations must be balanced against the need to meet operational requirements. • It is therefore proposed to modify Design Code L.05 to state that “[a]ll development 	<p>All design codes set out in Section 7.1 have been drafted to broadly be applicable to any and all development sites and types – where a design code applies to a specific use, this is already referenced in the text, though there are some areas where this could be clarified.</p> <p>In terms of L.05, this is considered to be the minimum level of independent scrutiny required for ‘major development’ based on the council’s existing approach. However, schemes are brought before both the QRP and CRP in consultation with officers to ensure they are timely, effective and proportionate to the scale and type of development proposed.</p>	<p>Section 7.1 – amended design code R.04 to read as follows:</p> <p>All development proposals <u>incorporating non-industrial uses</u> must demonstrate that they will be easily connectable to a district heat network in the future.</p> <p>Section 7.1 – amended design code L.06 to read as follows:</p> <p>Developers <u>of proposals incorporating residential uses</u> must prepare community-led management plans as part of management and maintenance strategies to support opportunities for residents to take ownership</p>

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION, PARAGRAPH OR PAGE NO	OFFICER SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
			<p>proposals classed as ‘major development’ must be reviewed, <u>where necessary</u>, at least twice by both the Brent Quality Review Panel (QRP) and Community Review Panel (CRP), with the review format <u>and number of reviews</u> to be agreed with the council on a case-by-case basis”.</p> <ul style="list-style-type: none"> We also object to the current wording of Design Code L.01, which states that: "Streetscape improvements on privately-owned land must be designed to adoptable standards and offered to the council for adoption." Accordingly, we recommend that the second part of the wording is removed from Design Code L.01. The objectives of Design Code L.06 are noted and acknowledged. However, it should be specified that it is only applicable to parts of the Growth Area providing communal amenity spaces within individual developments. 	<p>If entering into a planning performance agreement (PPA), QRP and CRP meetings will be agreed in principle as part of the overall schedule of pre-application meetings, and this is assessed on a case-by-case basis. As such, the wording of L.05 is considered to be sufficiently clear and flexible.</p> <p>It is the council’s ambition that the east-west and north-south routes within the Illustrative Masterplan will become part of the adopted highway to allow the movement network to function as set out in the relevant spatial strategy in Section 3.1. However, the council recognises other less significant access roads or spurs within individual sites should remain the responsibility of landowners.</p>	<p>over communal spaces within individual developments.</p> <p>Section 7.1 – amended design code L.01 to read as follows:</p> <p>Streetscape improvements on privately-owned land must be designed to adoptable standards and offered to the council for adoption, <u>unless the council agrees that the overall movement strategy of the Growth Area is not impacted by non-adoption.</u></p>
L07-11	Turley Associates, on behalf of Goodman Real Estate	8.1 North Circular Road	<ul style="list-style-type: none"> Section 8.1 seeks to guide the enhancement of the North Circular Road. At present, however, the associated design coding is too inflexible and fails to acknowledge that the desired enhancements will not be achievable on every site. London Plan Policy T7 is clear that development proposals should not cause unacceptable impacts on London’s strategic road networks. Not only are the design codes silent on this matter, their wording is in many places at odds with the schedule set out in the 	<p>Noted. The dimensions set out in the design codes referenced are considered the minimum to deliver the required improvements to the North Circular Road streetscape. The impact of these on individual sites has not been tested in detail, but it is acknowledged that these may be difficult to deliver and, as such, they may need to be negotiated, in some cases. Regardless, any development proposals will be assessed on a case-by-case basis, per Brent’s pre application service.</p>	<p>No proposed change.</p>

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION, PARAGRAPH OR PAGE NO	OFFICER SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
			<p>Cabinet Report (Row 183) which accompanied the publication of the Draft SPD. At present a number of the design codes in this section are worded as “must[s]” – namely, Design Codes M.01.NCR, M.02.NCR, B.01.NCR, B.02.NCR and I.03.NCR. However, the Cabinet Report recognises that the design codes for the North Circular “will not be achievable on every site” and should instead be considered “a starting point for discussions as part of the development management process”.</p> <ul style="list-style-type: none"> Accordingly, we recommend that these design codes are either deleted, re-worded to comprise a much broader, less-prescriptive set of objectives, or else prefaced with a similar caveat to that set out in the Cabinet Report. 		
L07-12	Turley Associates, on behalf of Goodman Real Estate	9. Delivery approach and Phasing	<ul style="list-style-type: none"> The indicative massing suggests the Goodman site will be delivered between years 6-10. The site is considered to present a longer-term development opportunity: it is currently fully let and, as a result, not expected to come forward for redevelopment until approx. ten years’ time, when leases of the current occupiers are due to expire. Accordingly, we would suggest that the re-developed site massing should instead first appear on the following page, which provides an indicative overview of massing during years 11-15+ of the Masterplan period. 	<p>Noted.</p> <p>It is recommended the massing diagrams be retained as is, to allow Goodman flexibility to bring forward redevelopment earlier if circumstances and conditions allow, with an additional footnote to the phasing diagram to cover this point.</p>	<p>To change the Overview of massing 6-10 years diagram to add the following footnote:</p> <p><u>Indicative phasing is shown for the Staples Corner Business Park site (1000 North Circular Road). Development on this site is expected to come forward when circumstances and commercial conditions allow.</u></p>

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION, PARAGRAPH OR PAGE NO	OFFICER SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
R01-1	Resident 1	General	<ul style="list-style-type: none"> Brent does as it chooses for e.g., Watling Gardens. No parking, no gardens not even any consideration for privacy. 	Noted.	No proposed change.
R02-1	Resident 2	General	<ul style="list-style-type: none"> Concerned with homelessness in the country. 	Noted.	No proposed change.
R03-1	Resident 3	General	<ul style="list-style-type: none"> The Council should have more important things to spend its money on – health, social care and education. 	Noted.	No proposed change.
R04-1	Resident 4	3.2 Land Use and Zoning	<ul style="list-style-type: none"> Housing, particularly affordable housing delivery is crucial. 	<p>Noted and agreed.</p> <p>The draft SCGA SPD has factored in provision for housing and includes provision for 3,066 homes. Affordable housing provision is included within this number, the proportion of which is based on targets set within the Local Plan.</p>	No proposed change.
R05-1	Resident 5	1.4 Challenges	<ul style="list-style-type: none"> Safety and poor environmental quality of the area. 	<p>This is noted as one of the Challenges on Page 17 of the draft SCGA SPD. Investment in the physical infrastructure and an improved public realm will be essential to the growth of the area.</p>	No proposed change.
R06-01	Resident 6	9.2 Infrastructure Projects	<ul style="list-style-type: none"> Request for more local services such as culture, schools, shops, doctors' surgeries and dentists. 	<p>The Local Plan does not identify any need for school provision in the area, but this is regularly reviewed as part of Brent Council's statutory responsibility for school place planning. Provision for retail and other types of community use have been factored into and included within the draft Illustrative Masterplan.</p>	No proposed change.

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION, PARAGRAPH OR PAGE NO	OFFICER SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
R07-01	Resident 7	4.15 Indicative Massing and Building Height	<ul style="list-style-type: none"> Density and heights proposed, particularly heights along the residential boundaries i.e. Chipstead Gardens are a concern. 	The draft Illustrative Masterplan has sought to limit building heights along the sensitive fringes of the SCGA and has sought to optimise them along the Edgware Road where they would be closer to public transport i.e. Brent Cross West Station. Specific concerns have been raised about the heights closest to Chipstead Gardens. The heights are indicative and acceptability will be determined on a case by case basis and be subject to daylight and sunlight assessments. Please refer to Design Limitations at paragraphs 4.1.6 and 4.1.7 of the document.	No proposed change.
R08-01	Resident 8	3.6 Green and Blue Infrastructure	<ul style="list-style-type: none"> More facilities needed for young people such as play space. 	The draft Illustrative Masterplan (Chapter 4) includes provision for a series of new open spaces and pocket parks as well as improving access to existing park spaces such as the Welsh Harp and Clitterhouse Playing Fields. Individual residential developments will be required to make children's playspace provision in line with London Plan and Local Plan policies.	No proposed change.
R09-01	Resident 9	General	<ul style="list-style-type: none"> Increase in traffic and parking congestion. 	Industrial uses will need to maintain vehicle use since this is essential to their operation. The residential uses will be required to be car free except for wheelchair provision. It is likely that Controlled Parking Zones will be needed for surrounding residential streets, the cost of introducing these will be the subject of developer contributions to be secured as part of the planning process.	No proposed change.

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION, PARAGRAPH OR PAGE NO	OFFICER SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
R10-01	Resident 10	3.3 Public Realm	<ul style="list-style-type: none"> Better connection to public transport is required and more improved pedestrian connections to the Brent Reservoir. 	Transport connectivity improvements are outlined in 9.2 Infrastructure Projects. Item F Edgware Road crossing to better link to Brent Cross West Station and Item C new pedestrian and cycle green bridge. The council will seek to secure S106 contributions and Community Infrastructure Levy as part of the planning process to contribute towards delivery.	No proposed change.
R11-01	Resident 11	3.3 Public Realm	<ul style="list-style-type: none"> Cycle lanes are needed in the area. 	The draft SCGA SPD includes potential for new and improved cycle infrastructure in Design Code Chapters 8. These will rely on privately owned land for delivery and be controlled by a combination of S278 and S38 legal agreements.	No proposed change.
R12-01	Resident 12	General	<ul style="list-style-type: none"> Impact on bus services. 	Please refer to S10-06 above.	Please refer to S10-06 above.
R13-01	Resident 13	General	<ul style="list-style-type: none"> Impacts on residential amenity, i.e. loss of light, wind conditions, overlooking, noise. 	Per 4.1.7, more detailed design development will be required to consider these issues as schemes are developed, and must include daylighting, sunlight, microclimate, overlooking as well as noise assessments.	No proposed change.
R14-01	Resident 14	General	<ul style="list-style-type: none"> No student accommodation please. 	This is noted. The draft SCGA SPD does not mention any requirement for this type of accommodation. The acceptability of determining these specific types of uses will be determined on a case by case basis, subject to the planning process.	No proposed change.
R15-01	Resident 15	3.6.9 Flood Risk	<ul style="list-style-type: none"> Impact on flooding. 	Urban greening and sustainable drainage solutions form part of the draft SCGA SPD, in Chapter 9.5 Environmental Sustainability.	No proposed change.

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION, PARAGRAPH OR PAGE NO	OFFICER SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
R16-01	Resident 16	3.3 Public Realm	<ul style="list-style-type: none"> Urban greening and green space. 	The draft Illustrative Masterplan (Chapter 4) includes provision for a series of new open spaces and pocket parks as well as improving access to existing park spaces such as such as the Welsh Harp and Clitterhouse Playing Fields.	No proposed change.
R17-01	Resident 17	General	<ul style="list-style-type: none"> The impact on the Welsh Harp i.e. breeding birds and dominating buildings. 	Section 3.7 of the draft SCGA SPD requires the flight paths of breeding birds to be considered. The draft Illustrative Masterplan has sought to limit heights and building proximity along the more sensitive northern edge of the Growth Area where it meets the Welsh Harp.	No proposed change.
R18-01	Resident 18	General	<ul style="list-style-type: none"> Poor quality architecture is shown in the document. 	Design Code Chapters 7 & 8 of the draft SCGA SPD seek to enhance the character of the area and improve architectural quality, through the use of Design Codes.	No proposed change.
R19-01	Resident 19	2.2 Policy Context	<ul style="list-style-type: none"> Heritage and retention of buildings. 	Per S04-01 above, a new historic environment map to be added to the document to reference heritage buildings and assets, including retained assets.	Please refer to S04-01 above.
R20-01	Resident 20	Design Code Chapters 6 to 8	<ul style="list-style-type: none"> Is the Design Code mandatory? 	The design code requirements are defined by the use of clear language such as 'must', 'should' and 'could'.	No proposed change.
R21-01	Resident 21	3.2 Land Use and Zoning	<ul style="list-style-type: none"> Designation for flexible C-Class uses instead of solely "residential. 	The draft SCGA SPD has been informed by the Local Plan which sets out an ambition to deliver 2,200 homes. The acceptability of determining specific types of Class C uses will be determined on a case by case basis, subject to the planning process.	No proposed change.

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION, PARAGRAPH OR PAGE NO	OFFICER SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
R22-01	Resident 22	10.6 Decant and Business Relocation	<ul style="list-style-type: none"> Support for small to medium enterprises is required. 	Developers will be required explore relocation options and propose and implement a business decant and relocation strategy as part of any planning application. The Local Plan requires 10% of any new employment floorspace is affordable.	No proposed change.
R23-01	Resident 23	Chapter 10 Delivery Approach & Phasing	<ul style="list-style-type: none"> Delivery challenges given land fragmentation. 	Noted. The draft SCGA SPD has made assumptions given the 200+ landowners in the area and has sought to identify larger opportunities and consolidate sites. Section 10 sets out a strategy and phased approach to delivery.	No proposed change.
R24-01	Resident 24	General	<ul style="list-style-type: none"> Edgware Road is not suitable for homes. 	It is assumed this comment is made in relation to noise and air quality. The acceptability of determining new homes along the Edgware Road will be subject to noise and air quality assessments. Please refer to Design Limitations at paragraphs 4.1.6 and 4.1.7 of the document.	No proposed change.
R25-01	Resident 25	1.7 Staples Corner Growth Area	<ul style="list-style-type: none"> How was the masterplan boundary drawn? 	The masterplan boundary has been set by the Local Plan Policy BEGA2A.	No proposed change.
R26-01	Resident 26	General	<ul style="list-style-type: none"> Fly tipping is a concern. 	Please refer to S03-2 above with respect to fly tipping to the River Brent and Brent Reservoir. Investment in the physical infrastructure and an improved public realm will benefit the environmental quality and appearance of the area.	Please refer to S03-2 above.
R27-01	Resident 27	Design Codes Chapters 6 to 8	<ul style="list-style-type: none"> Who will be responsible for making the roads wider/adding green footpaths and the new access roads? 	The majority of these will come forward on private land, and secured via a combination of S278 and S106 legal	No proposed change.

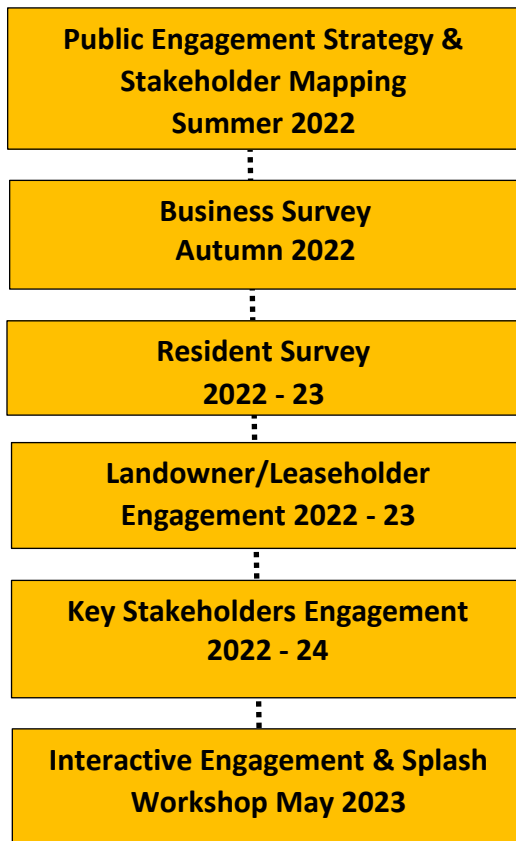
REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION, PARAGRAPH OR PAGE NO	OFFICER SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				agreements. Please refer to 6.8 Delivery and Phasing for more detail.	
R28-01	Resident 28	General	<ul style="list-style-type: none"> Would like to see Brent leading a campaign against single-use plastic shopping-bags. 	Noted, however this comment is not a relevant consideration for this place specific supplementary planning document.	No proposed change.
R29-01	Resident 29	General	<ul style="list-style-type: none"> Please can we have a cinema /cultural hub/events space and independent shops? 	Provision for retail and other types of community use have been factored into and included within the draft Illustrative Masterplan. The acceptability of determining these specific types of uses will be determined on a case by case basis, subject to the planning process.	No proposed change.
R30-01	Resident 30	General	<ul style="list-style-type: none"> More tree planting and green infrastructure is needed. 	Open spaces and green infrastructure are proposed in a number of locations in the SCGA and seek to address the open space deficiency in the area. The introduction of new open spaces will have a positive impact on future development, as well as for residents and businesses.	No proposed change.
R31-01	Resident 31	General	<ul style="list-style-type: none"> The walk to the station is not the nicest, having to walk through an industrial estate which ultimately discourages using it. 	Noted. This route lies within LB Barnet who aware of the issue. If the relevant site comes forward for redevelopment, there would be an opportunity to address this.	No proposed change.
R32-01	Resident 32	General	<ul style="list-style-type: none"> Skills training for young persons is needed. 	Noted. This can be secured as individual sites come forward for planning permission as part of the S106 legal agreement attached to any grant of planning permission.	No proposed change.
R33-01	Resident 33	9.2 Infrastructure Projects	<ul style="list-style-type: none"> A bridge to connect Crest Road to the new development. 	Existing routes provide walking facilities from Crest Road to the SCGA. Owing to the level change from Crest Road to the	No proposed change.

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION, PARAGRAPH OR PAGE NO	OFFICER SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				SCGA (over 24m), a bridge would serve no purpose or benefit.	
R34-01	Resident 34	8.1 North Circular Road	<ul style="list-style-type: none"> In the Design Code for the North Circular Road, that there is a pedestrian path which separates "Trees and SuDS" from a 3-lane carriageway. Is this intentional? It sticks out, relative to the other Design Codes, in using pedestrians to protect cars from hitting trees. Surely the trees should protect pedestrians from being hit by cars? I would certainly move "Trees and SuDS" so that it is next to the carriageway, as it is for other Design Codes in this consultation (e.g. Edgware Road). 	<p>Noted. Unfortunately, this cannot be delivered without consent from TfL who own and manage the North Circular Road. As such, we have assumed retention of a footway directly adjacent to the carriageway.</p> <p>However, a 4m wide shared zone for pedestrians and cyclists is shown behind the 'Trees and SuDS' zone and it is expected this will become the principal footway along the North Circular Road.</p>	No proposed change.
R35-01	Resident 35	Design Code Chapters 6 to 8	<ul style="list-style-type: none"> Not been enough consultation with the local community on the Design Code and this new identity. There have been Staples Corner Community Champions involved in this project but how many of them were there and from which areas? 	<p>Engagement has been at the heart of the development of this SPD since work commenced in 2022. In terms of the Design Code, this started with the recruitment of a democratically selected group of Community Champions to participate in a series of engagement workshops that took place from December 2022 to February 2023.</p> <p>The Sortition Foundation, on behalf of the council, sent 4,000 letters to residents and businesses within and around the Staples Corner Growth Area, inviting them to become Community Champions. The recruitment area was defined based on proximity to the Growth Area and included all of Dollis Hill ward east of Dudden Hill Lane, part of Welsh Harp ward, and parts of LB Barnet to the east of the A5 Edgware Road.</p>	No proposed change.

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION, PARAGRAPH OR PAGE NO	OFFICER SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				<p>The Sortition Foundation selected 25 people to participate as Community Champions using their established methodology for defining focus groups that are truly representative of a particular area. This methodology utilised data from sources including the ONS, NOMIS and Brent Equality Profile and set corresponding proportional targets across a range of demographics such as, gender, age, ethnicity, disability, and educational level.</p> <p>A draft Design Code was consulted on from 24th August to 2nd November 2023. This included a number of in-person drop-in events in the local area. In total, 191 representations were received from 36 respondents throughout the consultation period including residents, local stakeholders, landowners and statutory authorities. Consideration was given to all consultation representations, responses provided and, where necessary, changes were recommended to the draft Design Code, that have since been incorporated into this SPD.</p>	
R36-01	Resident 36	3.2 Land Use and Zoning	<ul style="list-style-type: none"> • More flexible land uses - i.e. no separation between industrial and light industrial uses, designation for flexible C-Class uses instead of solely "residential". 	Land Use Strategy and Zoning is set out in Masterplan SPD Section 3.2. The acceptability of determining more specific types of uses will be determined on a case-by-case basis, subject to the planning process.	No proposed change.

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION, PARAGRAPH OR PAGE NO	OFFICER SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
R37-01	Resident 37	4.2 The Illustrative Masterplan	<ul style="list-style-type: none"> Removal of prescribed areas open space / green infrastructure within the masterplan to allow for a site-specific approach to provision to make effective use of land and better respond to local-level constraints. 	Open spaces and green infrastructure are proposed in a number of locations in the SCGA and seek to address the open space deficiency in the area. The introduction of new open spaces will have a positive impact on future development, as well as for residents and businesses.	No proposed change.

Pre-Statutory Consultation Events



Phase 1: Early Engagement Activities Business Survey – Autumn 2022

Brent’s Regeneration Team developed a Business Survey to connect with businesses located within Staples Corner, with the goal of developing a masterplan that maximises opportunities for both local and new businesses to thrive and expand. Conducting a Business Survey provided valuable insights into the characteristics of local businesses, their satisfaction levels, confidence, future plans, and identified areas for improvement at Staples Corner to enhance support for businesses.

Leaflets distribution

814 business surveys were distributed by post to local businesses within Staples Corner. The survey included an option to provide additional contact information in order to be kept more easily informed about future engagement activities.

HaveYourSay Platform

Online platform (Have Your Say) was set up to support and promote the business survey and online feedback. The Have Your Say Online platform (Brent website) offers an accessible platform for interacting and consulting with communities and stakeholders, enhancing participation, diversifying engagement demographics, fostering trust via transparency, and enabling collaboration to enhance design quality. The platform remained open at all times during the preparation of the Staples Corner Masterplan.

Door Knocking

We conducted door knocking during the month of September 2022.

The team visited more than 100 businesses located within the SCGA, where 65 surveys were completed in a short face-to-face interviews, and door knocking was thus considered the most effective approach for getting businesses to engage with the Business Survey.

Analysis of survey responses

84 total responses were received as part of this business survey. We analysed the survey responses received by various mediums (online, post and door knocking). Based on the businesses that participated in the survey, the following conclusions can be drawn:

About the business:

- 62% of the businesses to remain open and only two businesses are planning to close.
- 88% of the businesses have no plans to relocate outside Staples Corner.
- Wholesale with retail covers a significant part (33%) of businesses within Staples Corner.
- 51% of the businesses trading in Staples corner for less than 10 years.
- Have been operating stable and expect to increase their trading over the next 5 years.

About Staples Corner:

- Staples Corner is considered an ideal location for business.
- The area has a good road network and connectivity with central/rest of London.
- Local employment (staff and/or business owners live locally).
- Areas of concern within Staples Corner are safety and security, environment, on-street parking, traffic, pedestrian, public transport and logistics/access to their premises.
- New Brent Cross West Station will improve transport connectivity with central London.

About the premises:

- Overall businesses are happy with their premises and the size of their unit.
- 37% of the businesses have floor spaces of over 500 sq.m.
- 75% of the premises are under leasehold or rented.
- 58% of the premises have up to 10 workers.
- Businesses are not satisfied with the business rates and tax.

Residents Survey – 2022-2023

The carrying out of a Residents Survey formed part of the Regeneration team's early engagement strategy and was undertaken to better understand the needs of local residents, satisfaction levels and how Staples Corner could be improved to better support residents.

HaveYourSay Platform

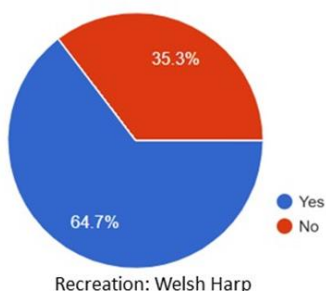
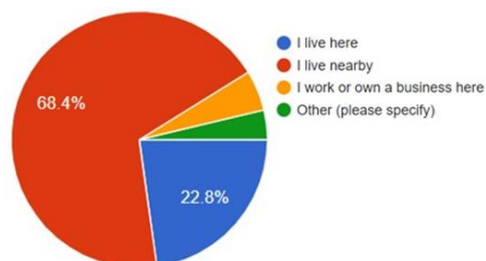
Online platform (Have Your Say) was set up in December 2022 to support and promote the residents survey and online feedback. The Have Your Say Online platform (Brent website) offers an accessible platform for interacting and consulting with communities and stakeholders, enhancing participation, diversifying engagement demographics, fostering trust via transparency, and enabling collaboration to enhance design quality.

Advertising and promotion

The resident’s survey was advertised on various platforms including Brent’s magazine during the months of January to March 2023 to make residents aware and to have a maximum response. The survey includes an option to provide additional contact information in order to be kept more easily informed about future engagement activities.

Analysis of survey responses

In total 216 responses received via haveyoursay platform and google form. Based on the residents that participated in the survey, the following conclusions can be drawn:



Total Responses: 216
22.8% live within Staples Corner
68.4% live nearby to Staples Corner

Key locations for shopping:
 Brent Cross
 Tesco Brent Cross
 Wembley, Neasden, Cricklewood and Colindale

Recreation
Approx. 65% visit Welsh Harp reservoir for recreation.

Other green spaces/recreation nearby
 Gladstone Park
 Hampstead Heath
 Fryent Country Park
 Clitterhouse playing fields

Strengths:

- Good Shops
- Parking
- Connectivity- convenience of access in all directions
- Easy access to M1, bus routes

Weaknesses:

- Traffic and Congestion
- Poor quality of environment
- Poor pedestrian and cycle route
- Not resident friendly and heavy industrial

Key Need for Development:

- Green space/parks
- Walking and cycling routes
- Community space

Landowner/Leaseholder Engagement 2022 - 23

Early conversations between the Council and key landowners/leaseholders were initiated as part of the masterplan process and this process was continued through statutory consultation.

Discussions were useful to understand landowners/leaseholder current use of their sites and future plans, to inform the phasing and the timing for future redevelopment. Proposals in the masterplan were then developed so sites could come forward accordingly in different periods. Individual particularities about the sites were taken into consideration when developing the proposals to support its deliverability.

Stakeholder Engagement 2022 - 2023

Dedicated meetings were held with key stakeholders as part of the masterplan process to produce a shared vision and a deliverable SCGA Masterplan. Public bodies and infrastructure providers engaged with are listed below:

- GLA
- Barnet Council
- TFL
- National Highways
- Canal and Rivers Trust
- Natural England
- West London Alliance

- West London Business
- Vattenfall
- Brent’s Quality Review Panel

Phase 2: Interactive Engagement & Splash Workshops May 2023

During May 2023, we organised interactive engagement events and hosted a splash workshop as part of our public engagement program for Phase 2 of the Masterplan development process, led by RCKa consultants. The main purpose of this phase was to engage with the community on what the key guiding principles and vision for the area should be.

Guiding Principles to 'What if...?' Statements

The Guiding Principles were developed by a select community group known as the Staples Corner Community Champions. The first phase of engagement involved opening up this conversation to the wider community through 'What If...' Vision Statements to understand:

- If the community agrees with the principles?
- What are their priorities and concerns?
- Do the statements need to change?
- What is missing?

This was formatted into a Questionnaire published on Brent's 'Have your say' website and printed and distributed during the 'Splash' site visits and in-person engagement event.

 <p>Destination Corner</p> <p>What if Staples Corner was known across London?</p> <p>A unique and desirable location with a reputation for thriving businesses, as well as culture and educational opportunities.</p>	 <p>Celebrate the Existing</p> <p>What if Staples Corner celebrated its unique history?</p> <p>A rich sense of identity expressed through historic landmarks, celebrating existing communities and industrial heritage.</p>
 <p>Harmony and Balance</p> <p>What if Staples Corner provided equal opportunities to all?</p> <p>Safety, wellbeing and a collaborative business environment—a great place to live and work.</p>	 <p>New Connections</p> <p>What if Staples Corner was the best connected neighbourhood in Brent?</p> <p>Local transport links, walkable routes to Brent Cross and the Welsh Harp, and efficient connections to central London.</p>
 <p>Love and Care</p> <p>What if the people of Staples Corner were empowered to shape their neighbourhood?</p> <p>A diverse community of people, with the tools needed to take active ownership of a flourishing neighbourhood.</p>	 <p>Unlock Value</p> <p>What if Staples Corner was the ideal place to grow your business?</p> <p>Prioritising opportunities for new jobs alongside economic growth, including manufacturing, logistics and the creative industries.</p>

On-site splash campaign

A graphic identity for the Staples Corner Community Vision Engagement was developed from the original work developed by Bandiera as part of the Design Code engagement.

On May 3rd and 5th 2023, RCKa carried out two site walk-arounds, handing out flyers, meeting with local business owners and erecting posters and banners to advertise the project and events. Key stakeholders were contacted prior to the visits including:

- Schools;
- Religious Groups;
- Sports Clubs and Youth Groups;
- Community Groups;
- Housing Associations;
- Businesses;
- The Staples Corner Community Champions;
- Cafés and Restaurants.

RCKa walked around the Staples Corner Growth Area over 2 days, handing out over 200 leaflets and talking to business owners, employees and local people. Four meetings were set up with businesses including:

- Motacus Construction;
- Atlantic Electronics;
- Cocap;
- Rama Carpets.

The team also visited other businesses including the Ox and Gate Pub, Bellissima, Work Man's Café, Megabites, Omega Café, Harrison Varma Joinery, English Cheesecake Company and Magnet Trade.

Concerns about the development included the increase in traffic, not simply service traffic but the adjacent schools cause domestic traffic at similar closing times to businesses. The lack of amenity, green space and good quality F&B options was a clear issue with many businesses having staff kitchens, so they are not reliant on the existing facilities. It was noted that this has put employees off working in the area and limits places to meet clients. Businesses were keen to group together to raise awareness, improve marketing and outreach through a Staples Corner Business Association and/or website.

Community engagement events (in-person)

On May 23rd 2023, an in-person engagement event was held over lunchtime at Bellissima Ristorante. Bellissima is located on Coles Green Road, a central location in the Staples Corner Growth Area. The intention was to make the event accessible to businesses and employees during the working day.

A QR code was created and added to all collateral and social media posts directing interested parties to an eventbrite event to sign up to either the in-person or online events. Eight A1 consultation boards gave details on the ambition of the masterplan and some of the preliminary feedback from the Community Vision questionnaire on each of the Guiding Principles.

The event drew a lot of attention with 26 people attending including business and landowners.

Community engagement events (online)

On the evening of May 24th 2023, the team held an online engagement event. The turn-out was fewer than expected with only six attendees therefore the format was altered to a presentation with an open discussion at the end.

Collating feedback

For a complete understanding of how the future of Staples Corner should develop, a review of the feedback to date was completed alongside the community vision engagement. This included a review of:

- LBB Business Survey
- LBB Resident Survey
- LBB Engagement Strategy
- Landowner Engagement

In addition, the team organised an additional vision workshop with Brent with a detailed look at the Guiding Principles and the evolving vision statements.

Landowner Engagement: As part of this stage of the engagement, the team carried out a series of meetings with landowners to understand their concerns, constraints and desire to develop the land. The following landowners participated:

- Atlantic Group
- Euro Group
- Goodman
- John and Pascalis
- Legal and General
- Pure Data Centres
- Rama Carpets
- Wing Yip
- Atlantic Group
- 2 Apsley Way and 4 Wellington Park Estate
- Hathaway Developments
- Casabella Development
- Hurlington Capital
- Safestore

Community Vision Questionnaire: The Community Vision Questionnaire was hosted on Brent's 'Have Your Say' website and was live throughout the month of May 2023. The questionnaire received 99 responses.

After collating all the survey feedback, the Guiding Principles were developed into Vision Statements. Firstly, a second visioning workshop was held with Brent Council, following which the vision statements were updated and published on a final poll for final feedback.

Feedback from the Community Vision Questionnaire, Brent's engagement surveys, landowner meetings and visioning workshops was incorporated into the Vision Statements. The updated statements were published in the final public poll to summarise this stage of the masterplan engagement. The poll had a total of 22 responses.

The poll was split into two sections, the first asking for comments on the high-level vision statements and section 2 providing more detail about how this will be achieved.

Results:

77% of people either definitely agree or somewhat agree that the statements reflect their vision for the future. Common feedback was that visual examples would help to visualise the Vision Statements. This should be demonstrated through the Development Scenario Options.

77.5% of people either definitely or somewhat agree with the vision statement. Responses agreed with the vision for creating a platform for existing businesses, supporting local employment and encouraging a mix of businesses. Concerns were mostly focused on the language of the statement which, without examples, made the vision difficult to understand.

73% of people either definitely or somewhat agree with the Vision Statement. Responses were enthusiastic about outreach and training for young people, creative spaces and possibility of increased footfall. Concerns included how this would be achieved in reality and about the increased traffic pressures this would put on the existing roads.

77% of people either definitely or somewhat agree with the vision statement. Concerns included the safety of walking and cycle routes in the area, parking numbers and reliance on car usage for travel in this area and improving the quality of the environment including air, acoustics, and planting.

68% of people either definitely or somewhat agree with the vision statement. Comments agreed the need for social infrastructure including a post office and dental clinics. Concerns included how to balance industry and residential neighbourhoods in reality and responses required more information on the council's ambition to provide affordable homes.

73% of people either definitely or somewhat agree with the vision statement. This is the vision statement with the largest proportion of people voting 'definitely agree'. Responses focused mainly around the need for green spaces and planting and for improvements to the maintenance of public realm.

77.5% of people either definitely or somewhat agree with the vision statement. Responses to the Love and Care statement are similar to the others however the comments express a concern in how the vision will be delivered in practice. Further discussion required to enable the community to feel greater ownership of future development.

