

Respondent	Section Commented Upon	Comments / Changes Sought	Officer Response	Proposed Changes Strikethrough = removed / <u>Underline</u> = added
1) Chris Barrons / Hannah Pyper of LB Brent Landscape Design Team	SPD Objectives Objective V. Add to the Regeneration of Park Royal	Section would benefit from the explicit reference to landscape quality and commentary on the current lack of tree and greenery.	Comment accepted	This is a key site and provides an opportunity to continue to modernise and improve the environmental quality of the area, provide quality buildings, create an improved layout and enhanced public realm. <u>As there is a lack of trees and greenery in Park Royal this redevelopment will require a particular focus on landscape quality.</u> It provides an opportunity to assist in the further development of a key gateway site into Park Royal started by the First Central Business Park. It could provide an opportunity to supply some incubator and growth space for growing and existing firms.
	Section 5 Sustainability Appraisal	Amend reference to 'public open space' to read 'green space.'	Comment accepted	improve the ecological diversity of the site through landscape design, with particular regard to native species and incorporate some public open <u>green</u> space for the benefit of the wider public area;
		Amend reference to building design and landscape quality to read as two separate issues.	Comment accepted	<ul style="list-style-type: none"> improve the building design and landscape quality of Park Royal through the introduction of high quality exemplars given that the adjacent buildings some architectural significance are to be demolished; <u>and</u> <u>improve the landscape quality of Park Royal through the inclusion of a landscape structure within the Masterplan and the landscaping of individuals sites.</u>
Section 7 Sustainable Development & Environmental	Explicit reference to potential for use of wind energy sought	Comment accepted	Please see amendments made under respondent 8 - Simon Burton of Faber Maunsell on behalf of the London Energy Partnership	

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	Standards			
	Energy Efficiency			
	Section 8.5 Landscaping	General requirements section would benefit from inclusion of suggested text	Comment accepted	The landscape of a site and the street frontage provide a setting for buildings and make an essential contribution to what constitutes the character of an area. Furthermore, the landscape scheme <u>provides an invaluable contribution to the quality of life of those living / working / studying in the area.</u> UDP policy BE6 <i>Public Realm: Landscape Design</i> sets out how the quality of the development can be enhanced;
	General requirements			
		Re-definition and expansion of point relating to existing trees sought	Comment accepted	maintaining <u>retaining</u> existing trees and <u>ensuring their protection during demolition and construction;</u>
	Section 8.5 Landscaping	Include reference to additional benefits of retention – through inclusion of suggested text	Comment accepted	The site is subject to two tree preservation orders. These protect a number of groups of trees mainly along the perimeter of the SPD site area. At present the site lacks trees and therefore it is important that existing trees are protected. <u>These trees will help to enhance and define new development, rather than hinder it.</u> Where any loss is deemed essential, replacement trees must be species of high amenity value with the emphasis on replacement with native forest type trees. Indeed, the surrounding developments will benefit from the introduction of large species of trees.
	Trees			
	Section 8.5	Re-arrangement and inclusion of	Comment accepted	All landscape works should be designed to

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	Landscaping Open Space	definition sought – through inclusion of suggested text		<p>create usable outdoor space for employees. All-weather spaces should be created, through the use of paths and paved areas. All such spaces should become garden-like in character to encourage use by employees. Hard and soft landscape works ratio should be designed to give maximum usable space. Shelter from wind and sun should be provided by shrub and tall planting. The inclusion of structures such as pergolas to give shelter from rain will be encouraged. Other types of protection and shelter will be considered.</p> <p><u>All landscape works should be designed to create useable outdoor space for employees. Such spaces should become garden-like in character to encourage use. This means the space should include plants giving a variety of colour, fragrance, size and texture, seasonal variation and wildlife value. Trees must be included; ornamental species are likely to be suitable for these spaces. The hard and soft landscape works ratio should reflect this. All-weather spaces should be created though the use of paths and paved areas, and the inclusion of structures such as pergolas will be encouraged. Shelter from wind and sun should be provided by shrub and tree planting. Other types of protection and shelter will be considered. All trees / shrubs must be suitable for their location.</u></p>

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				<p><u>Preference will be given to native species because of their habitat creation benefits. Each open space / park should 'be its own space' in terms of species used. Maintenance plans for all landscape works should be submitted with the planning application.</u></p>
	Specific Requirements	Amend hospital led consideration list to include reference to garden like spaces	Comment accepted	Secure <u>garden-like spaces</u> for <u>patients and visitors</u> will be necessary dependent upon the specific nature of any resultant hospital;
		Amend education led consideration list to include 'green spaces' in place of 'open spaces'	Comment accepted	Depending upon the specific nature of any resultant educational use, <u>open green spaces</u> may be needed for games / sport;
	Section 9 Planning Obligations Public Open Space / Public Realm	Remove the word 'public' from sub heading Amend second paragraph of section to read as per suggested text	Comment accepted	<p><u>Public Open Space / Public Realm</u></p> <p>The Council will require appropriate, local public open space(s); such as a pocket park, to be incorporated into the planning and design of the development of this site. The Council will seek to secure the creation and maintenance of such spaces, as well as unlimited public access to these spaces through a planning obligation agreement.</p> <p><u>The Council will require the provision and maintenance of green spaces in the planning, design and development of this site. The green spaces will provide amenity space to meet the needs of people working in and visiting the area and will enhance the quality of Park Royal as a major employment location.</u></p>

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				<u>If housing is provided on the former lorry park site the Council will require the provision and maintenance of a children's play area.</u>
2) Cllr Freeson	Section 4 SPD Objectives Objective XII. The following uses are not acceptable on this site	Too restrictive	This element needs to specifically detail what we may and may not find acceptable. It is important that we are clear that residential will not be permissible across the site as a whole.	None necessary
		Consider inclusion of Community Facilities for large scale gatherings given good linkages.	The Sequential Test set out in PPS6 <i>Planning for Town Centres</i> and UDP Policies SH3 <i>Major Town Centres and District Centres</i> and CF1 <i>Location of Large Scale Community Facilities</i> require that such uses to be directed, in the first instance to town centre locations. It would therefore be inappropriate for this SPD to promote such uses at this location without the Sequential Test first being applied.	None necessary
	Section 5 Sustainability Appraisal	Options listed – the health and education uses should be led by related skilled industrial investment and production. SPD should encourage relationship with health services.	Comment accepted	Section 8.2 Land Uses will be amended to reflect this A) Hospital led - Hospital uses to occupy approximately 1/3 of the total site area <u>forging a</u>

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				<p><u>relationship with health services</u></p> <ul style="list-style-type: none"> - Remaining 2/3 of site to be occupied by uses which sit more comfortably within traditional employment uses definitions - Mix could incorporate aligned medical research works, bio-science or similar and should be led by <u>related skilled industrial investment and production</u> <p>B) Education led</p> <ul style="list-style-type: none"> - Education uses to occupy approximately 1/3 of the total site area - Again remaining 2/3 of site to be occupied by uses which sit more comfortably within traditional employment uses definitions - Mix could incorporate creative industry users particularly media activities - Educational use to maximise employment growth sector linkages wherever possible and should be led by <u>related skilled industrial investment and production</u> <p>C) Hospital & Education mix</p> <ul style="list-style-type: none"> - Hospital & education uses to occupy approximately 2/3 of the total site area <u>forging a relationship with health services</u> - Again remaining 1/3 of site to be occupied by uses which sit more comfortably within traditional

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				<p>employment uses definitions - Mix could incorporate aligned medical research works, bio-science or similar or creative industry users and should be led by related skilled industrial investment and production</p>
		<p>Renewables – should be more positive and seek to obtain higher input than 10% Highest BRE standards should be sought</p>	<p>Comment accepted. Officers have had assistance from the London Energy Partnership to enable the SPD to be as positive as current policy frameworks permit on this matter</p>	<ul style="list-style-type: none"> ▪ ensure the development would generate at least 10% of the site's energy needs, measured in terms of carbon dioxide emissions, from on-site renewables, wherever feasible; <p>Additionally, please see amendments made under respondent 8 - Simon Burton of Faber Maunsell on behalf of the London Energy Partnership.</p>
	<p>Section 6 Current Policy Context</p>	<p>Locally listed buildings – re-use to be encouraged rather than replacement. Require that the historic environment is to be respected.</p>	<p>The demolition of these locally listed buildings has already been approved as part of the planning permission for the adjacent business park. However, the SPD includes a commitment to securing a high quality exemplar given the loss of these buildings of some architectural merit.</p>	<p>None necessary</p>
<p>Section 7 Sustainable Development & Environmental Standards</p>	<p>Renewables – should be more positive and seek to obtain higher input than 10% Remove 'wherever feasible' caveat</p>	<p>Comment accepted. Officers have had assistance from the London Energy Partnership to enable the SPD to be as positive as current policy frameworks permit on this</p>	<p>In relation to maximising the use of renewable energy sources applicants are to ensure that the development would generate at least 10% of the site's of the site's energy needs, measured in terms of carbon dioxide emissions, from on-site</p>	

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			matter. Additionally, in accordance with the comments received from GLA Officers, the SPD will be amended to state that any failure to achieve the minimum 10% figure requires evidentiary justification.	renewables, wherever feasible. <u>Any failure to achieve the minimum 10% figure will require evidentiary justification.</u> Additionally, please see amendments made under respondent 8 - Simon Burton of Faber Maunsell on behalf of the London Energy Partnership.
	Section 8.2 Land uses	The associated uses identified should not be seen as being entirely separate from the general industrial uses. The SPD should seek to encourage the linkages between the districts identified to maximise opportunities for the cross feeding of opportunities.	Comment accepted	The proportion of land to remain in traditional employment use is explicitly stated to ensure that an acceptable level of industrial employment capacity is secured. The associated uses identified should not be seen as being entirely separate from the general industrial uses. <u>This document seeks to encourage the linkages between the districts identified to maximise opportunities for the cross feeding of opportunities.</u>
		The small scale associated uses should be identified as being for local workers and residents instead of just workers	EMP6 can only be applied to serve the needs of workers in the vicinity. Ancillary services to meet the needs of any new residents will be considered separately where any proven need is established.	None necessary
		The indicative nature of the plan (figure 9) should be emphasised so as not to provide too crude a land allocation division. Districts should allow for synergies between uses to be emphasised and built upon.	Comment accepted	<u>This indicative plan seeks to suggest one of the ways in which the site could be redeveloped. It does not reflect a clear Council preference. The arrows are shown as moveable boundaries to reflect this. Applicants are encouraged to develop a scheme which incorporates districts which</u>

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				emphasise and build upon the synergies between the different uses proposed. Five land use zones have been identified for the SPD site.
	Section 8.3 Building Heights	Too prescriptive?	The targets are there to provide indicative guidance as to what may be considered acceptable. Flexibility is retained to enable an innovative design solution to exploit sites opportunities whilst being sensitive to end user requirements.	This indicative plan seeks to suggest one of the ways in which the site could be redeveloped in order to maximise the sites potential, with the most intensive uses located closest to the transport interchange. It does not reflect a clear Council preference as an innovative design-led approach will be necessary. The most southern part of the site, closest to the transport interchange, is capable of taking the highest density.
		Replace word 'parcel' with 'site' in 3 rd paragraph.	Comment accepted	The site parcel identified for housing should be developed at up to 4 storeys in keeping with the adjacent Bluefield scheme. The design of all zones should have regard to the adjacent business park.
	Section 8.5 Landscaping	A comprehensive approach should be taken to allow the linking of activities.	Comment accepted	The landscape scheme provides an invaluable contribution to the quality of life of those living / working / studying in the area. Furthermore, the landscape of a site and the street frontage provide a setting for buildings and make an essential contribution to what constitutes the character of an area. <u>A comprehensive approach should be taken to landscaping to allow the linking of activities.</u> UDP policy BE6 <i>Public Realm: Landscape Design</i> sets out how the quality of the development can be enhanced;
Section 9 Planning	SPD should state that the renewable energy scheme should have a wider	Officers agree that the SPD should be amended to	Section 7. <i>Sustainable Development & Environmental Standards</i>	

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	Obligations Energy	application for other parts of Park Royal	encourage any renewable energy scheme that has wider application for other parts of Park Royal.	In relation to maximising the use of renewable energy sources applicants are to ensure that the development would generate at least 10% of the site's of the site's energy needs, measured in terms of carbon dioxide emissions, from on-site renewables. Any failure to achieve the minimum 10% figure will require evidentiary justification. <u>The Council would encourage any proposals for a renewable energy scheme to consider its wider application for other parts of Park Royal.</u>
	Section 9 Planning Obligations Community	Consider provision of comprehensive sports centre / occupational health centre / maximising linkages. 2 nd paragraph necessary?	Officers agree that the SPD should be amended to encourage the provision of wider health facilities for the benefit of the local community such as a healthy living centre.	Planning Obligations will be put in place to ensure that the provision of community space/ ancillary worker's uses is incorporated into any new development and the provision of these facilities/ services is safeguarded over a period of time; e.g. <u>a healthy living centre</u> , childcare facilities or a gym or other facilities for employees with other care responsibilities (e.g. disabled, long term sick or elderly dependents) for example, through subsidy to pay for care costs or the agreement of flexible working arrangements.
	Section 9 Planning Obligations Open Space / Public Realm	Question appropriateness of section given uses promoted?	Comment noted, however Officers feel that it is equally important or these issues to be addressed in relation to commercial uses as for residential.	None necessary. Additionally, please see amendments made under respondent 1 - Chris Barrons / Hannah Pyper of LB Brent Landscape Design Team
	Section 9	Develop section on premises for new	The text included with the	None necessary

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	Planning Obligations Employment & Training	started businesses / SMEs further	draft was as drafted by the Policy & Regeneration Unit and therefore is assumed to be adequate to enable the delivery of their initiatives.	
	Section 9 Planning Obligations Affordable Housing	Provide definition of intermediate housing	Comment accepted	Where any housing development is proposed, the Council will seek to ensure the development provides a mix of housing including 50% affordable housing aligned to the Borough's housing needs, with a 70% / 30% split between social rental and intermediate housing. However, key worker housing will be a priority should a hospital be built on the site. <u>Intermediate housing includes low cost ownership schemes and keyworker housing. It may also include some low cost market housing where its price is closer to other forms of intermediate housing.</u>
	Section 10 Planning Application Requirements Archaeological Assessment	Consider adding in reference to historic environment	Comment noted. However, deemed inappropriate as the demolition of the locally listed buildings has already been approved as part of the planning permission for the adjacent business park.	None necessary
3) Dr Robert George, Ealing Resident	General	I have read all of the SPD and overall find it to be a useful and constructive framework for taking the redevelopment forward. My comments and suggestions and question are restricted to the issues affecting Ealing residents of the lower end	Support welcomed and comments noted.	None necessary

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		of Moyne Place and immediate surrounds.		
	Fig 2 page 4	Proposed SPD site backs onto gardens in Moyne Place, at the top end the acoustic wall provides some protection/barrier from the redevelopment. At the lower end there is no such physical barrier except that provided by mature trees and assorted shrubs etc. This end of the former Guinness branch Railway line was designated as an area of local nature conservation importance in the Brent UDP also tree preservation orders have recently been placed on some of the trees. I do not accept, nor should Brent that the UDP designation of this small area of land should be overturned (see 2 below).	The draft SPD failed to acknowledge the designation of this section of the site as a site of Borough (Grade II) and local nature conservation importance. This was an oversight. The SPD does not seek to, nor can overturn this designation. However, the Policy allows for their loss where compensatory provision is made or no adverse effect is proven.	Section 8.5 Landscaping <u>Applications affecting the site of Borough (Grade II) nature conservation importance located within the SPD area will need to consider the level of protection afforded by UDP Policy OS13 Development of Sites of Borough (Grade II) and Local Nature Conservation Importance. If development is proposed for this area applicants will need to complete a specialist ecological survey of the site to identify what of importance is located there. The loss of this site may be deemed appropriate if it can be demonstrated that there will be no adverse effect on nature conservation or that compensatory provision for wildlife can be made.</u> Additionally, the plan will be amended to reflect this designation.
	SPD Objectives page 5-6	Excluding this small parcel of land from the SPD is most unlikely to impact negatively on the following SPD objectives I, II, III, IV, V, VI, VII, VIII, IX, X but very likely to impact negatively on XI (maintain quality of life for park Royal Residents) .	Comment accepted	See point above
	Fig 5 page 18 SPD Site in Context	This is incorrect in that the far end of railway siding adjacent lower end Moyne place is not currently used for any	This plan merely seeks to provide an indication the site in context. It does not	None necessary

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	Surrounding Land Use Zones.	purpose, except nature conservation and wildlife. To imply otherwise is disingenuous and unhelpful, to planners and residents alike.	supersede the sites designation as a site of Borough (Grade II) and local nature conservation importance.	
	Fundamental Requirements page 19	Excluding this area from any redevelopment proposals and retaining as a green space is completely consistent with the 6 fundamental requirements for any development as stated in the bullet pointed list on page 19. This area will also provide some protection from noise and pollution when Rainsford Road becomes more a through route and much busier as opposed to its current "backwater" status.	Comment accepted	See point above in relation to this part of the site
	Figure 8 page 23 UDP Proposal Map extract	This shows this area in solid colour (red/brown) with no colour key to aid interpretation. My recollection of the UDP enquiry outcome is that this indicated greenery/nature conservation, is this correct and if not, what is the significance of the colour coding of this area please? As noted above and elsewhere there is no reason that would be consistent with Brent's own SPD objectives for changing this designation within the SPD. However, this seems be the intention, though this is not explicitly stated but rather implied through the use of assorted colour coding on several of the figures. I am requesting absolute clarity of your intentions with regard to this specific area	Comment accepted	See point above in relation to this part of the site

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	Housing Section page 26	<p>please.</p> <p>In context of a possible new residential area notes a requirement for “appropriate segregation” and “introduction of extensive landscaped acoustic buffers to be formed where necessary” Essentially the point made above in respect of Guinness land adjacent Rainsford Road at lower end of Moyne Place. Thus, it is in fact contradictory to Brent’s own requirement for new housing that this land is shown as part of the redevelopment package within the SPD. The existing housing next to Guinness land adjacent Rainsford Road at the lower end of Moyne Place is within the LB of Ealing, is this the reason Brent are not concerned with providing an equivalent degree of segregation for this area as only Ealing residents are potentially affected ?</p> <p>Impact of Brent Planning Decisions on Ealing Residents. Please let me know the names and contact details for Ealing officials with whom you are liaising on these matters. I have copied this letter to the Ealing Planning Department but would much prefer to be dealing with identified individuals there, familiar with the issues and boundaries . Also it would be most helpful to me and others if Brent’s understanding of the exact physical boundary between Ealing and Brent as it</p>	<p>Comment noted. Brent Council is equally committed to providing an appropriate level of segregation for Brent and Ealing residents alike. The Council will seek to protect and where possible enhance the Quality of life of all residents in the vicinity.</p> <p>The SPD can be amended to include the Borough Boundary.</p>	<p>None necessary</p> <p>New plan to be included to identify the Borough Boundary.</p>

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		relates to the Moyne Place and Guinness site area was defined explicitly in the SPD and promulgated to local residents. In your response to this letter please let me have the requested information on the boundary line.		
	Figure 9 page 27 Indicative Redevelopment Land Use Opportunities	This colour codes all of this area as Public Transport Link, but its not at all clear what this means in the context of potentially removing the existing green space. However the text below mentions creation of landscaping which is encouraging but I am requesting greater clarity and transparency of what is intended and/or within the planning guideline please.	As acceptable above the SPD (text and plans) will be amended to reflect the level of protection afforded by UDP Policy OS13 <i>Development of Sites of Borough (Grade II) and Local Nature Conservation Importance</i>	As above
	Figure 11 page 33 Indicative Connectivity Arrangements	This shows the proposed “new bus route to be facilitated” passing directly through Rainsford Court and protected trees. Is this correct? see also comment below on proposed width of a twin track busway or tram line and implications for lower end of Rainsford Road.	Comment noted. Officers accept that the alignment implied on the indicative plan is misleading. It is not proposed that the route pass through Rainsford Court. Any alignment will be sympathetic to existing TPOs and will be explored in detail when proposals are further advanced.	Plan to be altered to reflect revised indicative alignment
	Page 34 “The council will require a transport assessment to be carried out”	This includes specific mention of a review of the alignment of Rainsford Road, this will need to take into account the various considerations mentioned above for the lower end of Rainsford road where it gets very close to existing residential areas of LB Ealing (Rainsford Court and Moyne	Comment noted. The review of the alignment of Rainsford Road relates primarily to its relationship with the Southern end of the SPD site. Any alignment affecting the Northern part will be explored	<ul style="list-style-type: none"> Study of potential access options, including a review of the alignment of the approved Rainsford Road link (<u>to the South-East of the site</u>)

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	Figure 12 page 37 Indicative Landscape treatment	<p>Place). I am requesting specific and explicit reassurance on this point within the final SPD</p> <p>Shows at least 5 “existing trees to be retained” in this area which is most heartening and welcomed warmly. I understand that this is not a guarantee of their retention but would urge for all of the reasons above that these trees and associated green space/shrubbery etc is also protected and retained. I also note and welcome the statement on page 38 that the Council will require a Landscape strategy appropriate to the relevant mix of uses to be prepared prior to development to address landscape issues and tree planting;</p> <ul style="list-style-type: none"> • The extensive use of buffers between uses; • The introduction of green roofs; • The protection of existing trees; and • A vehicle to tree ratio to be applied. <p>The first and third bullets are especially relevant to this area as it currently protects residential areas of LB Ealing from Rainsford Road traffic and the industrial estate areas beyond. I.e. its retention is entirely in accord with the Council’s requirements and its removal would be contrary to those requirements. It would be reassuring to see explicit protection of this buffer zone in the document.</p>	<p>in detail when proposals are further advanced.</p> <p>Support welcomed and comments noted. The SPD cannot explicitly protect this buffer but commitment to seek its retention can be asserted.</p>	<p><u>Buffers</u> As identified on indicative plan 4 <i>Landscaping</i> trees should create buffers along all major and minor access roads (Rainsford, Twyford Abbey, Coronation etc) and all new roads to minimise visual and noise impact of development on surroundings. Main roads should be developed with a ‘boulevard’ feel. A substantial visual / noise buffer will be required adjacent to the residential area. Buffers can be used to create an entrance to the site along access ways (use of same species of tree will be necessary). Green links should be created through the site; these will provide visual continuity and create a sense of open space and connectivity. <u>Additionally, existing buffers should be retained wherever feasible.</u></p>

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	Page 40, Public Transport Wembley Park Royal Link,	I note the projected width of a twin track busway or tram line is 5.5 meters. It is not clear how this width –presumably in addition to normal roadway – could be accommodated at the lower end of Rainsford Road adjoining Twyford Abbey Road without destruction of protected trees and probably the residential property of Rainsford Court as well. Please clarify exactly what is intended and how it will fit in to the lower end of Rainsford Road.	Comment noted. The guided bus-route proposal is not sufficiently advanced to enable the exact routeway to be plotted. Separate consultation will be undertaken on this matter in due course. This SPD merely seeks to reserve land to enable the scheme to come forward.	None necessary
4) Sue Spear, MD, The Candles Shop (London) Ltd	General	Our business is situated around the corner from the former Guinness brewery site in Cumberland Business Park. We are concerned that the footpath that was provided by the Guinness factory for public use which tracks along the edge of the site will not remain open for general use. This is an essential link route to the tube from the warehouse.	The road link proposed will have a foot path that is fully publicly accessible. Officers fully support the objective of securing public access through and across the site.	None necessary
5) Matthew Roe of CGMS, on behalf of the Metropolitan Police Authority		<p>Policy Context to Representations</p> <p>The provision of effective policing is of crucial importance across London to ensure safe environments are achieved consistent with Planning Policy Statement 1 (PPS1). Section 17 of the Crime and Disorder Act 1998 requires local authorities, police authorities and other agencies to consider crime and disorder reduction and community safety on the exercise of all their duties and activities.</p>	Comment noted.	<p>Section 8.1</p> <p><u>Safety and Security</u> All new development must be legible and clear to use, free from physical hazards and designed to reduce the opportunities for crime (Policy BE5 Urban Clarity and Safety). The Council will require applicants to obtain <u>Secured by Design</u> certification for the development, which is issued by the Association of Chief Police Officers. This approach should also be followed for non-</p>

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		<p>The Metropolitan Police have a key role to play in creating safe environments through the provision of adequate policing across London. Therefore the MPA are keen to ensure that planning policies to guide the future use of areas, particularly those where significant change is proposed, take into account their operational needs.</p> <p>At the local level, paragraph 3.7.18 of Council's adopted UDP recognises that the "<i>fear and reality of crime is a major factor preventing the full enjoyment and use of the environment</i>". UDP Policy BE5 states developments should seek to reduce the opportunities for crime and incorporate the aims and objectives of Secured by Design. Further detailed guidance is provided by the Council's SPG10 "<i>Community Safety</i>".</p> <p>The MPA welcome the recognition, at page 8 of the draft SPG, of the need to ensure the development addresses "<i>issues relating to the fear of crime by being developed to secure by design standards</i>". The document states that this commitment will be reinforced throughout the SPD. However, there appears to be an absence of any reference to this aim in the policies set down by the SPD.</p>		<p><u>residential buildings. Applicants are encouraged to consult with the Council's Crime Prevention Design Officer prior to submitting a planning application to ensure that appropriate measures are incorporated.</u></p>
	Section 8.1	This section should identify the	Comment accepted	As per response above.

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	Urban Form and Design Requirements	requirement for development proposals to minimise crime and fear of crime, and incorporate Secured By Design principles to create a safe environment consistent with national government planning guidance PPS1. The text should also refer directly to adopted UDP Policy BE5 (Urban Clarity and Safety) and SPG10 " <i>Community Safety</i> ".		
	Section 9 Planning Obligations	The MPA are mindful that significant additional development is likely to come forward as a result of the SPD, through the introduction of new uses and the intensification of employment activity. Although the quantum and nature of the proposed development is not specified at this stage, it is likely to result in the increased demand for policing. It is considered reasonable to potentially seek contributions through Section 106 agreements to mitigate the impact of new development on police resources and to ensure safe and secure environments are created. The MPA therefore recommend that the list of potential uses of Section 106 contributions should be extended to include reference to " <i>policing</i> ".	Officers are unconvinced that the development, if built to secure by design standards, will result in an increased demand for Policing and therefore do not consider the inclusion of a reference appropriate at this time. UDP policy BE5 <i>Urban Clarity & Safety</i> will be applied to ensure that the development is built out with appropriate regard to these matters.	None necessary
	Consultation	Having regard to the above, the MPA request that the Property Services Department of the Metropolitan Police Service are formally consulted when any planning applications are submitted for the redevelopment of the site.	Comment noted	None necessary

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		<p>Consultation should be forwarded to:</p> <p>Director of Asset Management Metropolitan Police Property Services 12th Floor, Empress State Building Empress Approach Lillie Road London SW6 1TR</p>		
6) Catherine Connell of Broadway Malyan on behalf of a local landowner	General	<p>The SPD aims to “secure the prompt redevelopment of the Guinness Brewery site”. It considers a number of strategic options for the land use of the site, including hospital, education and industrial/warehousing uses. In addition to this, the SPD discusses the requirements that any possible planning application would need to satisfy.</p> <p>Our client is wholly supportive of the aim to provide a significant increase in employment and aid the regeneration of Park Royal. It is also fundamental that any comprehensive redevelopment of the site does not detract from the establishment of the First Central development and makes the most of its proximity to existing and new public transport infrastructure by maximising densities across the site.</p> <p>However, a fundamental objection is raised to the scope and purpose of this</p>	<p>Support for the overall aim is welcomed.</p> <p>In relation to concerns over the scope and remit of the SPD some alterations are needed. The draft document was entitled Planning Position Statement / Supplementary Planning Document as not all of the matters explored within the document can have the status of SPD as they cannot clearly be linked to a Development Plan Policy. However, the draft document failed to clearly label which sections are to be afforded SPD status and which are exploring future possible policy direction and highlighting how the Council might view o a departure application; which are to be</p>	<p>Support for the overall aim is welcomed.</p> <p>Policy boxes to be removed to an annex, and policy cross reference put in place.</p> <p>Section 2 Introduction</p> <p><u>2.3 Status of Document</u> <u>This guidance has been adopted as a combined Supplementary Planning Document (SPD) and Planning Position Statement (PPS). The part of the document which constitutes SPD is supplementary to the policies contained within Brent’s Unitary development Plan (UDP) and the London Plan (LP). The part of the document which constitutes a Planning Position Statement will not carry the same weight as SPD as it does not relate to policies within the current development plan for the area but will provide guidance to developers as to proposed types of development which may be acceptable. All section of the main body</u></p>

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		<p>SPD.</p> <p>SPDs should expand upon relevant development plan documents, which in this case are the Brent UDP, adopted in 2004 and the London Plan, also adopted in 2004. An SPD should not introduce land-use allocations. The Local Development Document relevant to the site has not yet been formulated and the SPD is therefore premature to the formulation of policies within the LDF. Accordingly, the SPD does not comply with the guidance on the remit of SPD contained within PPS12 and is considered to be flawed on this basis.</p> <p>However, notwithstanding this fundamental objection, comments are also made on the content and structure of the document.</p> <p>The SPD proposes education and medical uses with no proper justification for these uses. Despite these uses being contrary to the UDP, residential uses are resisted for this reason. Thus the selection of land uses is inappropriate and unjustified. No supported justification is provided for restricting residential development on the site.</p> <p>The document is overly long and does not</p>	<p>label as the planning position statement. The document cannot and does not seek to make land use allocations, merely explore how the future of the site should be best explored and identify what alternative uses the Council may consider favourably in relation to any planning applications which may come forward before the new policy direction of fully explored. The UDP and London Plan designations for this site remain unchanged by this document. The formal future policy direction will indeed, be explored and tested through the LDF preparation process.</p> <p>Furthermore, in the re-editing of the document the boxes containing full UDP policy text will be removed to an annex, and policy cross reference put in place to aid the flow of the document.</p>	<p><u>of the document are afforded SPD status with the exception of section 8.2 Land Uses; within this section only the guidance relating to B2 (General Industry), B8 (Storage or Distribution) and closely related Sui Generis uses is afforded SPD status. All other uses, as promoted at paragraphs 8.2.13, 8.2.14, 8.2.16, figure 9 and paragraph 8.2.20, constitutes Planning Position Statement guidance. Any other reference contained within the document to uses falling outside of B2 (General Industry), B8 (Storage or Distribution) and closely related Sui Generis uses also constitutes Planning Position Statement guidance.</u></p>

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		<p>provide succinct guidance on the design and formulation of planning proposals on the site. Throughout the document, policies from the UDP, London Plan and other SPGs are reproduced without any further explanation or detail on their application. This defeats the purpose of SPD and makes the document unnecessarily cumbersome.</p> <p>Conversely, in other places the SPD is overly prescriptive and restricts an innovative design solution for the site, In essence the SPD is in danger of stifling design opportunities by being over-prescriptive.</p> <p><u>The Proper Purpose of SPD</u></p> <p><u>The role of SPD</u></p> <p>The purpose of SPD is laid out in PPS12, and is defined as follows: <i>“ Supplementary planning documents may cover a range of issues, both thematic and site specific, which may expand policy or provide further detail to policies in a development plan document. They must not however, be used to allocate land”.</i></p> <p>The PPS sets out the fact that SPD will not be subject to independent</p>		

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		<p>examination and will not form part of the statutory development plan. It also states that policies which should be included in a development plan document, and subjected to proper independent scrutiny in accordance with the statutory procedures, should not be set out in Supplementary Planning Documents.</p> <p>In addition to this, the SPD must be clearly cross-referenced to the relevant development plan document policy which it supplements (or before a relevant development plan document has been adopted, a saved policy).</p> <p><u>Adopted Policy</u></p> <p>The land use options within the SPD are not based upon any UDP policy and in fact largely conflict with the SEL designation of the site within the adopted UDP.</p> <p>We do not dispute that the SEL designation of the site is inappropriate now that the Brewery has ceased production but the fact remains that this is the site's adopted land use allocation and it is not for an SPD to seek to change land-use allocations.</p> <p>Indeed, it is specifically stated within</p>		

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		<p>Chapter 3 that the purpose of this SPD is to:</p> <ul style="list-style-type: none"> □ <i>“identify the most appropriate uses for the site and maximise its potential benefits;</i> □ <i>provide guidance on appropriate land use”.</i> <p>Chapter 2 also states that the production of the SPD would “Provide an opportunity to check and re-evaluate the land-use designation of this site” (Chapter 2).</p> <p>This is a matter which should be subject to public consultation and independent scrutiny in accordance with statutory procedures. Therefore, in accordance with PPS12, land-use allocations should not be set out within the SPD.</p> <p><u>London Plan</u></p> <p>Although the SPD suggests it is based upon policy within the London Plan, this appears to be a very loose interpretation of the policy which does not take into account the wider uses suggested. The Policy stated (5D.2) refers to Opportunity Areas within West London and states that development should maximise residential and non-residential densities and contain</p>		

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		<p>mixed-uses.</p> <p>Table 5D.1 of the London Plan has been reproduced showing <u>indicative</u> estimates of growth, though no discussion has been made around this table and it appears that too much weight has been placed upon it. Indeed, the text preceding this table at paragraph 5.93 states that West London could accommodate 45,000 additional homes and 86,000 new jobs and that much of this growth should be located within 'Western Wedge', extending from Paddington through to Park Royal and Wembley, which would include this site.</p> <p><u>LDF</u></p> <p>Brent Council's LDF is currently at the Issues and Options stage. The Issues and Options paper was released for consultation on Monday 5th September 2005 and consultation finishes on Friday 21st October, after the close of consultation of the SPD. The options for the site-specific allocation of the Guinness Brewery site are as follows:</p> <ul style="list-style-type: none"> ❑ Mix of hospital and education uses with related employment uses; ❑ Mix of distribution/storage and general industrial uses; 		

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		<p> <input type="checkbox"/> Hospital and medical-related employment uses/Education and creative industry/media uses. Therefore, the policies for the site have not yet been formulated and the land-use options proposed have not yet been subjected to public examination or independent scrutiny. It is therefore considered that the SPD has been produced with a little too much haste and is premature to the adoption of the LDF. <u>Conclusion</u> It is not at all clear within the SPD how the uses promoted within the SPD are derived from a development plan policy. There is therefore no robust policy justification for the range of uses promoted and also no justification in policy for disregarding other uses. It is considered that the production of an SPD for the Guinness Brewery site should be halted until the LDF has been rigorously tested and a preferred land use allocation for the site has been adopted. In not being clearly cross-referenced to a relevant development plan policy and in seeking to allocate land-use, the SPD as it stands is not in line with the guidance in </p>		

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	Land Uses	<p>PPS12.</p> <p>Notwithstanding that it is incorrect to do so, the SPD sets out options for land uses on the site.</p> <p>It is noted that employment uses is one such use. However, the industrial employment allocation of the site has already been established through the adopted UDP and London Plan. This section does not, therefore, need to use policy to justify the employment arguments. The points about the London Plan, Draft Industrial Capacity SPG and Draft SRDF should be contained within Chapter 6- Current Policy Context.</p> <p>Chapter 8 mentions that the site should fall within an IBP rather than a PIL, like the rest of Park Royal. Yet the SPD does not seek to justify why this is the case and indeed conflicts with the option it presents earlier in the document of a 'mix of all B class uses' being acceptable by saying that heavy or potentially polluting industrial uses are not acceptable in this location.</p> <p>Again, incorrectly, the SPD proposes hospital and education uses for the site. No justification has been made for these uses. There is no reference to any need for hospital or education uses on this</p>	<p>Comment noted. With regard to the uses promoted. These were selected as those which were capable of yielding significant numbers of employment, maximising the transport interchange opportunities whilst not suggesting those uses which ought to be directed to town centres.</p>	<p>See point above in relation to this matter. Additionally the final version will include a requirement for applicants to demonstrate justification for the release of any part of the SEA / SEL.</p>

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		<p>particular site or any reasoned justification as to why this site would be suitable for these uses.</p> <p>Equally, no reference has been made to other land uses having been considered. There is no reasoned justification for having disregarded alternative land uses.</p> <p>The document states that 'residential uses are not deemed to be acceptable across this site as a whole as this is contrary to UDP policy'. However, this justification is fundamentally flawed, when clearly the other uses proposed, particularly the hospital and education uses, are also contrary to the UDP. This is further confused in stating that a small amount of residential development on the former lorry park to the North would be acceptable, thus accepting the principle of residential use. Indeed, the document states that the objectives point to a type of re-development that would "not be wholly in accordance with the UDP" (Chapter 4).</p>		
	Length	In general, it is considered that in not respecting the correct scope and content of an SPG, the document is overly long and appears to include a large amount of information which is not entirely necessary. This has led to repetition of points and makes for an overly	Comment noted. Officers consider that the detail included allows for potential developers to be appraised of all of the necessary matters in order to speed up the application process.	As detailed above

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		<p>cumbersome document. Conversely, where the document considers what could be seen as more important points, it goes into very little detail and does not go far enough in providing explanations.</p> <p>Throughout the document, adopted UDP policies are reproduced even where they are not expanded upon. This is an unnecessary measure as it does not add any value to the document as supplementary planning guidance and only serves to make the document lengthier.</p> <p>The document could be slimmed down in places, for example, less detail could be provided on design and landscaping and UPD policies, which are not expanded upon, could be removed.</p> <p>As noted above, the document is overly long and in our view, Chapter 7 could be streamlined significantly. The 'sustainable development' section of the chapter does not provide any site-specific information regarding the sustainable development of the Guinness Brewery site. The Policy from the adopted UDP, BE12, provides detailed sustainable design and construction, and pollution control methods. This Policy is merely reproduced and the SPD does not seek to</p>	<p>However, in the re-editing of the document the boxes containing full UDP policy text will be removed to an annex, and policy cross reference put in place to aid the flow of the document.</p>	

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		<p>expand upon it, but merely adds some generic land-use principles, which are less detailed than the Policy. As this does not provide expansion or detail to Policy BE12, this section should be removed from the document.</p> <p>The Environmental Standards section could also be streamlined. The summary list at the end of this section would be enough to provide any prospective applicant with a good idea of what would be required from an EIA. The descriptions that go before this list are extremely detailed; this level of detail is unnecessary as the document is intended to provide guidance only.</p> <p>Chapter 10 is also far too detailed and repeats existing policy unnecessarily. In addition to this, the SCI is referred to as final, when in reality it has not yet been adopted.</p> <p>Chapter 8 forms the main body of the document; it is perhaps also the lengthiest part of the document. The overall vision for the site should be far more concise as the vision gets lost in the detail of the document. A more concise vision would provide a better platform upon which to begin the design of any scheme.</p>		
	Detailed	There is no site plan at the beginning of	The Draft document does	None necessary

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	Content	<p>the document marking out the boundaries of the site. Without it, and particularly in the absence of a UDP/LDF policy, the scope of the guidance is unclear.</p> <p>A two-stage approach to pre-application submission is promoted – a Development Framework, followed by a more detailed Masterplan. This seems unnecessarily onerous as there appears to be no reason why these two stages could not be amalgamated in order to speed up the process a little. This is especially significant as the aim of the SPD is to “secure the prompt redevelopment of the Guinness Brewery” and the SPD should act as a Development Framework within itself. It also does not provide the flexibility needed for a creative design response. Again, the summary list provided at the end of the chapter would be sufficient to guide design.</p> <p>The land-use zoning exercise is, again, not necessary within the SPD. It is up to the design response to dictate where different land uses should be located. The SPD is therefore too prescriptive and could stifle the design process.</p> <p>Chapter 9 on Planning Obligations is useful as a guide to what may be required. However, this is very much</p>	<p>include a site plan identifying the boundaries of the site.</p> <p>The next stage following this documents production will be a masterplanning stage – a two-stage framework and masterplan approach is not promoted.</p> <p>The land use zoning is merely indicative and seeks to illustrate that the most visitor / employee intensive uses should be located closest to the transport interchange. It would not preclude an innovative design response.</p> <p>Officers consider it to be important to clearly identify the range of planning obligations that may apply to any applications on the site. This can assist in the expediency of negotiations once any planning application is submitted.</p> <p>Officers would like to see a single application for the site come forward.</p>	

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		<p>down to individual proposals and should be dealt with in detail at planning application stage, taking into account site abnormalities. This amount of detail is therefore not required at this stage.</p> <p>Chapter 10 requires the comprehensive re-development of the site to be considered within one single planning application. This is an onerous requirement as the demonstration of 'no prejudice to the development of the whole site' should be sufficient. The wording of this chapter should be changed and should make it clear that an application for part of the site is acceptable, but should take in to consideration the site as a whole and potential for future development on the other parts of the site.</p>		
7) John Wachter of RPS Planning	Land Use	<p>The SPD considers a number of options for the redevelopment of the site including the introduction of hospital and education uses. RPS object to this on the basis that the site is allocated as a Strategic Employment Area in the London Plan (2004) and the adopted Brent Unitary development Plan (2004). Policy EMP8 in the UDP states that the following employment uses will be permitted in Strategic Employment Areas:</p> <ul style="list-style-type: none"> • Industry 	As above, additionally the final document will include requirements for applicants to demonstrate justification for any part of the SEA / SEL to be released.	As above, additionally requirement for applicant to justify release of land will be included.

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		<ul style="list-style-type: none"> • Warehousing • Business and • Closely related uses not falling within a use class (sui generis). <p>The Policy states that other uses will not be permitted in such areas where they would result in a loss of land in employment use. The reason for this, as explained in the supporting text (paragraph 7.7.9), is to maintain the economic base of the Borough, protect this land from 'hope value' associated with the prospect of development for higher value uses and to ensure that inappropriate land uses are not located here. As such a hospital and education uses should only be allowed on the site if it can be shown that there is not the demand for the redevelopment of the entirety of the site for employment uses as defined in Policy EMP8.</p>		
	Employment Uses	RPS welcome the recognition of Policy EMP8 from the Brent UDP in the SPD and the description of employment uses in the Policy and in paragraph 7.1.1 which included 'closely related uses not falling within a use class' (sui generis). This accords with the Mayor's draft Supplementary Planning Guidance on Industrial Capacity (2003) which states that sui generis uses may be appropriate in Preferred Industrial Locations which are	Comment noted; the UDP definition of employment uses will be more clearly stated.	All references to B2 & B8 amended to include closely related uses not falling within a use class (sui generis).

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		<p>a type of Strategic Employment Area.</p> <p>However, elsewhere when considering employment uses, the SPD only refers to B class uses, RPS consider that the SPD should incorporate the description of employment uses in the UDP as this has been done through the full development plan consultation process and the policies have been subject to scrutiny at public inquiry. This should be set out under the heading <i>Employment</i> on page 25 and should recognise the acceptance of sui generis uses in strategic employment areas because of their important employment generation within the Strategic Options under chapter5, <i>Sustainability Appraisal</i>, and within Chapter 8, <i>Land Uses</i>.</p>		
	Paragraph Numbering	As a general matter, RPS request that paragraph numbering is used in subsequent drafts of this document for ease of reference.	Comment accepted	Document amended to include paragraph numbering
8) Simon Burton of Faber Maunsell on behalf of the London Energy Partnership	General	Comments submitted by Faber Maunsell in the framework of a project for the London Energy Partnership supporting London's local planning authorities on energy in planning applications. These comments do not necessarily represent the views of the Mayor of London.	Comment noted	None necessary
	3. Site Background	<p>Insert additional bullets point;</p> <p>Provide sustainability guidelines for the</p>	Comment Accepted	<p>3. Site Background</p> <p>... • assist the local planning authority in the consideration and determination of future</p>

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		development particularly with respect to energy use and generation		<p>planning applications in the area.</p> <ul style="list-style-type: none"> • <u>Provide sustainability guidelines for the development particularly with respect to energy use and generation</u> <p>This SPD has been produced to provide a guide for potential applicants on the local Planning Authority's requirements and expectations for the Guinness Brewery site. The SPD does not bind the Council to grant consent for any particular development on the site...</p>
	4. SPD Objectives	<p>Insert additional policy reference & objective;</p> <p>4A.7-9 Energy efficiency and renewable energy</p> <p>V???. Minimise energy demand and include on-site renewable energy sources.</p> <p>A large site such as the Guinness Brewery site offers numerous opportunities to minimise energy use, supply energy efficiently and generate energy on site from renewable sources. 10% of the total site energy use from renewable resources forms part of the Mayor's Energy Strategy (Proposal13). Every building on the site will offer opportunities to reduce energy consumption and to use renewable resources and there are also opportunities for site wide energy</p>	Comment Accepted	<p>4. SPD Objectives</p> <p>...o 3B.5 <i>Strategic Employment Locations</i>;</p> <ul style="list-style-type: none"> • <u>4A.7-9 Energy efficiency and renewable energy and</u> <p>o 5D.2 <i>Opportunity Areas in West London...</i></p> <p><u>VI. Minimise energy demand and include on-site renewable energy sources.</u></p> <p><u>A large site such as the Guinness Brewery site offers numerous opportunities to minimise energy use, supply energy efficiently and generate energy on site from renewable sources. 10% of the total site energy use from renewable resources forms part of the Mayor's Energy Strategy (Proposal13). Every building on the site will offer opportunities to reduce energy consumption and to use renewable resources and there are also opportunities for site wide energy generation and distribution. See 'Integrating renewable</u></p>

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		generation and distribution. See <i>'Integrating renewable energy into new developments: Toolkit for planners, developers and consultants'</i> for London Renewables, on behalf of the Greater London Authority (GLA)		<u>energy into new developments: Toolkit for planners, developers and consultants'</u> for London Renewables, on behalf of the Greater London Authority (GLA);
	5. Sustainability Appraisal	<p>Amend following section as follows;</p> <p>ensure the development would generate at least 10% of the site's energy needs, measured in terms of carbon dioxide emissions, from on-site renewables, wherever feasible;</p> <p>Insert additional point as follows;</p> <p>Giving a high profile to sustainability, energy efficiency and on site renewable energy is intended to create several benefits for the site. The UK Government is committed to sustainability in the built environment and is launching the Code of Sustainable Buildings to help industry achieve this goal. Most major companies now have a strong commitment to becoming more sustainable and are tracking this in their annual environmental reporting. In choosing suitable sites for their activities the sustainability credentials of this site could be an important factor. There are also direct financial benefits to companies from energy efficiency and use of renewable</p>	Comment Accepted	<p>• ensure the development would generate at least 10% of the site's electricity or heat <u>energy needs, measured in terms of carbon dioxide emissions, from on-site renewables,</u> wherever feasible;</p> <p>...• contribute to the <i>10,000 Trees in Park Royal</i> project;</p> <p><u>Giving a high profile to sustainability, energy efficiency and on site renewable energy is intended to create several benefits for the site. The UK Government is committed to sustainability in the built environment and is launching the Code of Sustainable Buildings to help industry achieve this goal. Most major companies now have a strong commitment to becoming more sustainable and are tracking this in their annual environmental reporting. In choosing suitable sites for their activities the sustainability credentials of this site could be an important factor. There are also direct financial benefits to companies from energy efficiency and use of renewable energy sources from reduced fuel bills and these</u></p>

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		energy sources from reduced fuel bills and these considerations will play an increasingly important role in location choice for new developments		<u>considerations will play an increasingly important role in location choice for new developments.</u>
	7. Sustainable Development & Environmental Standards	<p>Amend as follows;</p> <p>Energy Efficiency The Council will require that the resultant scheme minimises energy consumption and maximises the use of renewable energy sources. With regard to minimising energy consumption applicants are to demonstrate that proposed heating and cooling systems for any new residential or commercial building have been selected in accordance with the following order of preference: passive design; solar water heating; combined heat and power, for heating and cooling, preferably fuelled by renewables; community heating for heating and cooling; heat pumps; gas condensing boilers and gas central heating. In relation to maximising the use of renewable energy sources applicants are to ensure that the development would generate at least 10% of the site's energy needs, measured in terms of carbon dioxide emissions, from on-site renewables, wherever feasible.</p> <p>applicants to ensure that the development would generate at least 10% of the site's</p>	Comment Accepted	<p>In relation to maximising the use of renewable energy sources applicants are to ensure that the development would generate at least 10% of the site's electricity or heat <u>energy needs, measured in terms of carbon dioxide emissions, from on-site renewables</u>, wherever feasible.</p> <p>• applicants to ensure that the development would generate at least 10% of the site's electricity or heat <u>energy needs, measured in terms of carbon dioxide emissions, from on-site renewables</u>, wherever feasible.</p>

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	8. Realising the vision for the Site	<p>energy needs, measured in terms of carbon dioxide emissions, from on-site renewables, wherever feasible;</p> <p>Insert the following;</p> <p>Due to the importance of incorporating renewable energy sources into the development, the options of installing some large and small wind turbines on the site is seen as possible. Generation of electricity by both large and small wind turbines is currently seen as one of the most cost effective ways of meeting renewable energy targets. This could, in addition to the energy generated, provide a highly visual landmark for the site and advertise its sustainability.</p> <p>Energy design The building design should specifically take into account the need for energy efficiency and the inclusion of building integrated renewables. This should include passive design, solar collectors, wind generators, biomass heating, etc. The whole site may be able to benefit from a district heating system, with a CHP or biomass heat generation system. The electric power generated by a CHP plant or by a wind turbine, could be distributed and sold to site occupants via a “private wire network” (as used by Woking Borough Council) and the involvement of</p>	<p>Comment noted. Officers will insert an amended version of the proposed text. It will be amended to reflect the fact that the Council supports the use of wind turbines but are concerned that that they are not suitable to all locations and as such should only be promoted subject to satisfactory environmental impacts.</p>	<p><u>Energy Design</u> <u>The building design should specifically take into account the need for energy efficiency and the inclusion of building integrated renewables. This should include passive design, solar collectors, wind generators, biomass heating, etc. subject to satisfactory environmental impacts. The whole site may be able to benefit from a district heating system, with a CHP or biomass heat generation system. The electric power generated by a CHP plant or by a wind turbine, (Generation of electricity by both large and small wind turbines is currently seen as one of the most cost effective ways of meeting renewable energy targets) could be distributed and sold to site occupants via a “private wire network” (as used by Woking Borough Council) and the involvement of an Energy Service Company (ESCo) may be a viable way to organise the complete system.</u></p>

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	9. Planning Obligations	<p>an Energy Service Company (ESCo) may be a viable way to organise the complete system.</p> <p>Amend / insert addition as follows;</p> <p>Evidence will also be required to confirm that materials reclamation/recycling targets negotiated using the Demolition Protocol and the energy and renewable energy targets, have been implemented.</p> <p>Furthermore, the Council will require that the development receives at least 10% of the site's energy needs, measured in terms of carbon dioxide emissions, from renewable energy sources on site.</p> <p>The Strategy will need to consider:</p> <ul style="list-style-type: none"> - scope for provision of combined heat and power on a site-wide basis, providing that possible planning and environmental issues such as potential visual impact, regeneration, urban design and townscape are addressed; - infrastructure for a possible future combined heat and power system as an integral part of planning and designing the development; for example, by provision of spatial allowances (such as ducting) in order to minimise the need for subsequent excavation; - potential for future developments on adjoining sites to link with energy 	Comment Accepted	<p>Evidence will also be required to confirm that materials reclamation/recycling targets negotiated using the Demolition Protocol <u>and the energy and renewable energy targets</u>, have been implemented.</p> <p>Furthermore, the Council will require that the development receives at least 10% of the site's the site's electricity or heat energy <u>needs, measured in terms of carbon dioxide emissions</u>, from renewable energy sources on site.</p> <p>The <u>Energy Strategy</u> will need to consider <u>include</u>:</p> <ul style="list-style-type: none"> - <u>assessment of the total energy demands of all the developments and related energy uses on the site, presented in terms of energy and carbon dioxide emissions</u> - <u>what energy conservation measures will be implemented in each development, beyond the 2006 Building Regulations Part L</u> - <u>the technical and economic feasibility</u> scope for provision of combined heat and power on a site-wide basis, providing that possible planning and environmental issues such as potential visual impact, regeneration, urban design and townscape are addressed; - <u>proposed</u> infrastructure for a possible

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		<p>infrastructure established on the development site; and - the implications of emerging technologies. Furthermore, the Council will require that the development receives at least 10% of the site's electricity or heat needs from renewable energy sources on site. In addition, a Green Tariff of up to 10% of off-site renewable energy supply, or an equivalent agreed by the Council, shall be maintained for the lifetime of the development. The Council will require evidence to be provided of compliance with this obligation, on occupation of the development.</p> <p>REFERENCES</p> <p>'Integrating renewable energy into new developments: Toolkit for planners, developers and consultants' for London Renewables, on behalf of the Greater London Authority (GLA)</p> <p>CEN help line</p>		<p>future combined heat and power system as an integral part of planning and designing the development; for example, by provision of spatial allowances (such as ducting) in order to minimise the need for subsequent excavation;</p> <ul style="list-style-type: none"> - analysis of the potential for future developments on adjoining sites to link with energy infrastructure established on the development site; and - <u>Study of the implications of emerging technologies, such as fuel cell CHP, microCHP for individual dwellings and biomass fuelled CHP</u> - <u>The technical and economic feasibility of the options for building integrated renewable energy sources, such as solar water heating, photovoltaic arrays, biomass heating, building mounted wind turbines, ground sourced heating and cooling, and an assessment of their feasibility in each building type</u> - <u>The technical and economic feasibility of all the options for other renewable energy sources on the site, such as stand alone wind turbines, biomass fuelled district heating and large photovoltaic arrays.</u> <p><u>The strategy will need to provide calculated energy demands, savings or generation</u></p>

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				<p><u>from the different options in terms of energy and carbon dioxide emissions and provide firm proposals for energy use levels, energy conservation measures and what renewable energy sources will be built in, to which developments, and who will use the energy collected.</u></p> <p><u>For help in preparing the Strategy see 'Integrating renewable energy into new developments: Toolkit for planners, developers and consultants' for London Renewables, on behalf of the Greater London Authority (GLA)</u></p> <p>Furthermore, the Council will require that the development receives at least 10% of the site's electricity or heat needs from renewable energy sources on site.</p> <p>In addition, a Green Tariff of up to 10% of off-site renewable energy supply <u>from renewable sources</u>, or an equivalent agreed by the Council, shall be maintained for the lifetime of the development. The Council will require evidence to be provided of compliance with this obligation, on occupation of the development.</p> <p>References are to be incorporated into Appendices as outlined in point below.</p>
	Additional References	Proposed energy references to be added. 1. 'Integrating renewable energy into		References to be added following Appendix A – Policy Checklist;

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		<p>new developments: Toolkit for planners, developers and consultants' http://www.london.gov.uk/mayor/environment/energy/docs/renewables_toolkit.pdf</p> <p>2. "Green light to clean power, the Mayor's Energy Strategy" http://www.london.gov.uk/mayor/strategies/energy/download.jsp</p> <p>3. Supplementary Planning Guidance on renewable energy. Draft publication summer 2005 Final publication winter 2005</p> <p>4. ODPM Building Regulation Part L Low or Zero Carbon Energy Sources – Strategic Guide http://www.odpm.gov.uk/stellent/groups/odpm_buildreg/documents/page/odpm_breg_034291.pdf</p> <p>5. ODPM. Planning Policy Statement 22: Renewable Energy http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_030334.hcsp</p>		<p>1. <u>'Integrating renewable energy into new developments: Toolkit for planners, developers and consultants'</u> http://www.london.gov.uk/mayor/environment/energy/docs/renewables_toolkit.pdf</p> <p>2. <u>"Green light to clean power, the Mayor's Energy Strategy"</u> http://www.london.gov.uk/mayor/strategies/energy/download.jsp</p> <p>3. <u>Supplementary Planning Guidance on renewable energy.</u> Draft publication summer 2005 Final publication winter 2005</p> <p>4. <u>ODPM Building Regulation Part L Low or Zero Carbon Energy Sources – Strategic Guide</u> http://www.odpm.gov.uk/stellent/groups/odpm_buildreg/documents/page/odpm_breg_034291.pdf</p> <p>5. <u>ODPM. Planning Policy Statement 22: Renewable Energy</u> http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_030334.hcsp</p>
9) Michael Crook of Cushman, Wakefield,	General	Before setting out our main comments below, I must say that we are very disappointed, and indeed surprised, at the generally unhelpful tone and excessive	Comment noted The level of guidance contained within the	None necessary except for inclusion of paragraph numbers.

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Healey & Baker on behalf of Diageo, Site Owners		<p>length of the document. The purpose of the exercise was to give guidance to prospective developers of this extremely important site in Park Royal, and, in its present form, the SPD is not sufficiently encouraging of development, regardless of the final mix of land uses which comes forward.</p> <p>The Consultation Draft also appears to us to contain far too many restrictions, conditions and proposed planning obligations, all of which are likely to be regarded as incentives by prospective developers.</p> <p>In our view, the document would benefit from editing, and proof reading, and also from the insertion of paragraph numbers for ease of referencing.</p> <p>The main points of concern to Guinness, however, are as follows:</p>	<p>document was included to ensure that prospective developers could be clear about what the Council would expect and may find acceptable. It is Officers opinion that this will ensure that any resultant applications are robust and will slim down the necessity for detailed negotiations and amendments.</p> <p>The document will be edited, proof read, and paragraph numbers inserted.</p>	
	1. Site Background - first paragraph	<p>Clearance of the site has commenced.</p> <p>The site area is about 10 hectares (25 acres)</p>	Comment Accepted	<p>Brewing production on the Guinness Brewery site in Park Royal ceased at the end of June 2005 and clearance of the site will soon <u>has commenced</u>.</p> <p>The Council needs to consider the future use of this key 8 Ha (20 acre) <u>10 Ha (25 acre)</u> site in Park Royal in the light of current London Plan and Brent UDP policy and also the need to maximise the potential that such</p>

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				a significant opportunity site has in the regeneration of Park Royal.
	2. Sustainability Appraisal - (page 8)	The underlined sentence beginning ... "the developmental requirements ..." should be replaced with the following - "The sustainability appraisal process has identified the following areas which should be considered in formulating any development proposals for the site..."	Comment noted, however, this is the established outcome of Brent's Sustainability Appraisals produced to date.	None necessary
	3. Land Uses - Figure 9 (page 27)	<p>Although it is accepted that this diagram is indicative, the public transport link is shown as taking up far too large an area along the eastern boundary of the site. It is suggested that this could be resolved by showing it diagrammatically with a broken line, overlaid on land uses as shown, rather than as a separate land use as such.</p> <p>At the foot of this page in the box, the expression . . . "the Council will require.." should be replaced with ... " the Council will expect ..."</p>	<p>Comment in relation to diagram accepted</p> <p>In relation to the box Officers consider the use of the term 'require' to be acceptable</p>	<p>Document to be amended to reflect this</p> <p>None necessary</p>
	4. Connectivity - First paragraph (page 30)	We object to the wording of this paragraph. We believe that it should be recognised that the southern part of the Brewery site effectively enjoys the same status as the Western Gateway Opportunity Site adjoining, once the new Central Line Underground Station is operational. The proposed Wembley - Park Royal Transit will extend the area of good public transport accessibility further	Comment noted. Officers consider that the statements contained within this paragraph remain true.	None necessary

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		to the north.		
	5. Page 30 - First paragraph	We object to any references to vehicular access from the approved perimeter road (Lakeside Drive - not Way). Such arrangement would not be compatible with the nature of the business park under construction on the adjoining land, although pedestrian / cycle connections may be acceptable.	Comment accepted	In general, it is assumed that vehicular access, particularly for industrial/warehouse uses, will be confined to the eastern end of the site, but any other uses more compatible with the approved First Central office development (offices, education, health etc.) may All uses will benefit from <u>pedestrian / cyclist</u> access being taken from the future eastern length of the approved Lakeside Way perimeter road.
	6. Page 32 - Final two paragraphs	These should be deleted as they are merely duplication.	Whilst these are merely repeated from the UDP Officers feel that it is important to highlight these.	None necessary
	7. Page 33 - Paragraph under Figure 11	Again this should be deleted as it is duplication.	Officers felt that this provides a useful summary of the issues as they relate to moving to, from and across the site.	None necessary
	8. Page 34 - In the box	Final bullet point should be amended to read - ..." Depending on the level of increased traffic generated by the development, the Council may require traffic calming measures in and around the site ..."	Comment accepted	<u>Depending on the level of increased traffic generated by the development, the Council may require</u> traffic calming measures in and around the site.
	9. Landscaping - Page 37	Omit paragraph under Figure 12 - duplication	Officers felt that this provides a useful summary of the landscaping matters.	None necessary
	10. Planning Obligations	No reference is made to the policy basis for these obligations, and it is considered	Officers believe that all of the Obligations cited have an	Policy references have been included in the text.

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		that at least some of them have no basis in either UDP or London Plan Policy. Any obligations sought should be cross referenced to appropriate policy, or if no such policy exists, omitted.	adequate policy basis, at either the national, Regional of Local Level. Regional and Local Level policies at included at appendix A.	
	11. Page 40 - Top - Public Transport	Wembley - Park Royal Link: - the right of way should refer to the Guinness Site, the Guinness Sidings no longer exist and use of their former site would sterilise a large area of the Brewery site unnecessarily.	Comment in relation to referring to the Guinness Site and not the Guinness Sidings is accepted.	A right of way will be required via the Guinness sidings route <u>site</u> between Twyford Abbey Road and First Central.
	12. Sustainable Development	It is considered that some of the items in this sub-section would not meet the tests of Circular 5 / 2005 and accordingly should be omitted.	Officers believe that all of the Obligations cited have an adequate policy basis, at either the national, Regional of Local Level. Regional and Local Level policies at included at appendix A.	Policy references have been included in the text.
	13. Community	The provision of child care facilities, a gym or other facilities for employees should be at the discretion of developers / occupiers and should not be the subject of planning obligations. Both paragraphs under this heading should be deleted.	Officers consider there to be a reasonable policy justification for this requirement.	None necessary
	14. Education	Alter the beginning of the paragraph to read - ..."Where the residential element would clearly require the provision of additional school places, the council will seek a financial contribution..."	Comment accepted	<u>Where the residential element would clearly require the provision of additional school places,</u> the council will seek a financial contribution (in accordance with the Council's UDP Policy at the point of application and proportional to the number of two bedroom+ housing units provided on the site) towards educational provision on all new residential units for local nursery, primary and secondary school places in the

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				London Boroughs of Brent and Ealing.
	15. Public Open Spaces - Public Realm	<p>Second para. - Delete from ..."as well as unlimited public access..."</p> <p>This is not an appropriate requirement, as it is likely to have serious adverse security and safety requirements for occupiers who should have the freedom to impose limitations on public access in the interests of the overall good management, safety and security of the development.</p>	<p>Comment noted, Officers propose to replace this text under amendments made as a result of comments made by respondent 1 - Chris Barrons / Hannah Pyper of LB Brent Landscape Design Team.</p>	<p>None additional necessary. Please see amendments made under respondent 1 - Chris Barrons / Hannah Pyper of LB Brent Landscape Design Team</p>
	16. Employment and Training	<p>Premises for new starter businesses etc.</p> <p>We object to the inclusion of this clause - this is not a suitable site for starter businesses or SME's as there are ample premises far more suitable for this type of use elsewhere in Park Royal.</p>	<p>Officers believe that this site is capable of providing some starter units and that this is a reasonable requirement.</p>	<p>None necessary</p>
	17. CCTV - Page 43	<p>End of paragraph - delete "including the underground station access link" This forms part of the First Central Package, and CCTV will be provided as part of that development.</p>	<p>Comment accepted</p>	<p>Particular regard is to be had to open spaces and pedestrian / cycle ways including the underground station access link.</p>
	18. Planning Application Requirements	<p>Employment strategy - omit second sentence, or re-word in a less discriminatory manner.</p>	<p>Officers do not consider this to be discriminatory.</p>	<p>None necessary</p>
	19. Urban Design Framework	<p>It is suggested that the urban design framework should be listed as part of the EIA requirements so as to enable EIA Regulations to be complied with, even though a single application will almost certainly not be detailed in respect of specific buildings.</p>	<p>The Council will require the detailed urban design information to be provided at the appropriate detailed design stage. Officers do not consider it to be appropriate to ask for it as part of an EIA.</p>	<p>None necessary</p>

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	20. Appendix A	Should clearly distinguish which of the policies are from the Brent UDP and which are from the London Plan.	Comment accepted	Document will be amended to reflect this
	General	There are quite a number of other typographical errors etc which we would be glad to point out if you wish, but the above represent the significant objections which Guinness have at this stage.	Comment noted	None necessary
10) Chris Price of Network Rail	General omission	<p>I am surprised that the document is completely silent on the issue of freight.</p> <p>With regard to the sustainability appraisal I would question whether options D, E & F were considered in light of their potential to be rail served. The environmental benefit of taking lorries off the road would create significant positives for these options, rather than the negatives that they are given. The development requirements referred to at the end of section 5 also make no mention of any type of freight movement, leading me to believe the issue may have been overlooked.</p> <p>The area attributes set out on page 20 also fail to mention the opportunity created by having on-site rail sidings. Furthermore section 8.4 on Connectivity makes no mention of the potential for rail freight.</p> <p>This is a rail served site that could easily</p>	<p>Officers support the principle of the redevelopment of the site utilising rail freight.</p> <p>However, Officers have been informed that the 'Guinness sidings' no longer exist as they have been removed following the connection to the main line being removed by the rail operators some time ago.</p> <p>The draft document includes the former sidings land within the site area to be redeveloped so as to secure as large a developable area as possible. Additionally, the Wembley-Park Royal link may require land take at this location; the precise alignment has yet to be determined.</p>	<p>Section 8.4 <i>Connectivity</i></p> <p><u>The former Guinness Brewery was served by freight rail sidings connected to the main line, these are no longer in place nor is the connection to the main line. The Council will support schemes including the reprovision of the sidings and their reconnection to the mainline network should this prove viable and not undermine current transport improvement plans.</u></p>

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		<p>be reconnected to the network and is in a location where freight paths would be available. Given the few freight sites in London, those that remain are at a premium. This aim of retaining the sidings is referred to in Policy PR5 Park Royal Western Gateway Opportunity Site. However, I can't find any reference in the document to promoting uses that specifically take advantage of the rail facility. Such use would still be employment generating and not have such an impact upon the surrounding road system. The London Plan and West London Sub Regional Framework both promote freight on rail and seek to improve facilities. This should be referred to in the policy context of the document. The plan should also more explicitly seek to promote uses that make use of a retained rail freight facility, as its loss would be contrary to policy.</p>		
11) Keira Murphy of the Environment Agency	General	The Environment Agency has no major issues with these two documents, however, we advise you to consider the following comments:	Support welcomed	None necessary
	P5 Section 4 - SPD Objectives	Reference to the environment was made in objectives I and V, however, we think greater emphasis should have been placed with regard to the natural environment within these objectives. Additionally, it is not clear in objective V whether the phrase 'improve the	Comment accepted	Please see amendments made under respondent 1 - LB Brent Landscape Design Team in relation to Section 5 Sustainability Appraisal

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		<p>environmental quality of the area' refers to the natural or built environment or both. There is a real opportunity to enhance the natural environment, for example, through the creation of natural habitats.</p>		
	<p>P8-9 Section 5 - Sustainability Appraisal</p>	<p>We support, in particular, the following identified developmental requirements that were included in this section:</p> <ul style="list-style-type: none"> • Ensure that design of any new development applies the principles of Sustainable Urban Drainage Systems; • Minimise water taken from mains and maximise opportunities for the re-use of water; • Improve the ecological diversity of the site through landscape design, with particular regard to native species and incorporate some public open space for the benefit of the wider public area; • Provide convenient communal waste management facilities (for residential and commercial users) within the redeveloped area; • Seek to integrate waste management facilities that would allow energy to be recovered from non-recyclable waste. <p>We recommend you include a requirement for the clean up of contaminated land following an investigation to establish potentially</p>	<p>Support welcomed and comment in relation to the clean up of contaminated land noted. Whilst this issue is not covered within this section it is covered within section 7 Sustainable Development & Environmental Standards</p>	<p>P8-9 Section 5 - Sustainability Appraisal</p> <ul style="list-style-type: none"> • <u>Ensure that following an investigation to establish potentially contaminated areas on this site any contaminated land is cleaned up.</u>

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	<p>P10 Section 6 - Current Policy Context</p> <p>P13 and P14, Section 7 - Sustainable Development & Environmental Standards</p>	<p>contaminated areas on this site.</p> <p>We recommend that this paragraph includes PPS9 Biodiversity and Geological Conservation because of the significant opportunities to incorporate building-in beneficial biodiversity features within the site. Furthermore, we recommend the inclusion of PPG25 Development and Flood Risk because of the importance of incorporating surface water drainage techniques to reduce run-off and improve surface water quality.</p> <p>We support in general the range of environmental matters you outlined on pages 13 and 14, in particular, land contamination, waste, water efficiency, sustainable urban drainage systems and green roofs. However, we have a few comments to make on detailed matters.</p> <p>Land contamination In addition reference should be made to PPS23 Planning and Pollution Control because prior to any permission being granted, the local authority has to be assured a site can be remediated to an acceptable standard.</p> <p>Water Efficiency In addition to recycling rainwater and</p>	<p>Comment accepted</p> <p>Comments accepted</p>	<p>This SPD has been developed in accordance with the guidance and policy contained within relevant national planning policy guidance and planning policy statements. Particularly PPS1 <i>Creating Sustainable Communities</i>, PPG4 <i>Industrial and Commercial Development and Small Firms</i>, PPG10 <i>Planning and Waste Management</i>, PPS12 <i>Local development Frameworks</i>, PPG13 <i>Transport</i>, PPS23 <i>Planning and Pollution Control</i>, and PPG24 <i>Planning and Noise</i>, <u>PPS9 Biodiversity and Geological Conservation</u> and <u>PPG25 Development and Flood Risk</u>.</p> <p>Land contamination Contaminated land, as defined by the Environment Act 1995 in terms of substances in, on, or under land where significant harm is or would be caused is potentially present within the SPD site area. An investigation will be necessary will be necessary to establish if any contamination is present, the hazards posed and the necessary remedial measures required. The Council will apply a presumption in favour of on-site treatment and necessary conditions regarding action and monitoring will be imposed. The site owners have started this process. The Council will be reviewing the findings and will need to satisfy itself that that the appropriate course of action has been / will be taken in</p>

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		<p>'greywater' this should include irrigation and open space maintenance.</p> <p>Sustainable Urban Drainage Systems It should be noted that at the planning application stage the Agency requires a surface water flood risk assessment (FRA) to be carried out for any development larger than 1 ha in size regardless of the risk of fluvial flooding.</p>		<p>accordance with PPS23 Planning and Pollution Control.</p> <p>Water Efficiency The resultant scheme will be required to incorporate measures to reduce the demand for water from the mains supply network. Measures that can be used include; <u>recycling rainwater and 'greywater', irrigation and open space maintenance.</u></p> <p>Sustainable Urban Drainage Systems The high number of impermeable surfaces such as buildings, hard landscaping, roads and car parks found in urban areas lead to significant drainage problems. The lack of permeable areas leads to excessive peak flows of storm water and indeed increase the total volume of water sent through the drainage system and directly into watercourses. This brings with it a risk of pollutants directly entering watercourses and drains. For this reason, as stated in PPG25, the disposal of surface water has long been a material consideration for local planning authorities in determining individual land-use planning proposals. <u>Indeed, at the planning application stage the Environment Agency requires a surface water flood risk assessment (FRA) to be carried out for any development larger than 1 ha in size regardless of the risk of fluvial flooding.</u></p>
	P15, Section 7	The requirements on page 15 did not	Comment accepted	The Council will require;

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	- Sustainable Development & Environmental Standards	include two of the environmental matters mentioned in the previous two pages, i.e. land contamination and water efficiency. For land contamination we recommend you include a requirement to establish if contamination is present from the site investigations and ensure the necessary remedial measures are applied. For water efficiency, include a requirement to incorporate water efficiency measures, e.g. recycling rainwater and 'greywater' and water efficiency in irrigation and open space maintenance.		<ul style="list-style-type: none"> • <u>applicants to establish if contamination is present from site investigations and ensure the necessary remedial measures are applied;</u> • <u>water efficiency measures to be incorporated into any scheme. e.g. recycling rainwater and 'greywater' and water efficiency in irrigation and open space maintenance.</u>
	P36, Section 8.5 - Landscaping	<p>The section headed 'Buffers' should refer to the Twyford Abbey Ditch located to the west of the site. The necessity of preserving a 5 metre wide undeveloped buffer strip alongside this watercourse should be emphasised. Preserving a 5 metre buffer strip will ensure the character of the watercourse is maintained and any necessary access is not restricted.</p> <p>Furthermore, this section includes a reference to including 'Green links' because they will provide visual continuity and create a sense of open space and connectivity. PPS9 Biodiversity and Geological Conservation, paragraph 12 states that networks of natural habitats are important for linking sites of biodiversity importance and to provide routes or stepping stones for migration,</p>	<p>Officers are of the opinion that any 5 metre wide undeveloped buffer strip alongside this watercourse would not extend into the site are.</p> <p>Comment in relation to Green links accepted.</p> <p>It is Officers opinion that the former reservoir does not warrant protection nor enhancement.</p>	<p>Green links should be created through the site; these will provide visual continuity and create a sense of open space and connectivity. <u>Indeed, PPS9 Biodiversity and Geological Conservation, paragraph 12 states that networks of natural habitats are important for linking sites of biodiversity importance and to provide routes or stepping stones for migration, dispersal and genetic exchange of species in the wider environment.</u></p>

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		<p>dispersal and genetic exchange of species in the wider environment. Therefore we advise that this be incorporated as the main reason for providing 'Green links' within the site.</p> <p>There is no mention as to what the plans for the reservoir are. The reservoir should be protected and enhanced from both a biodiversity (buffer zones and green links) and recreational viewpoint.</p>		
	P38, Section 8.5 - Landscaping	The requirement of the extensive use of buffers between uses should state that they include undeveloped buffer strips along watercourses and networks of linked natural habitats.	Officers do not consider there to be any buffers along watercourses and networks of linked natural habitats to be safeguarded.	None necessary
	P40, Section 9 - Planning Obligations	<p>We support the fact you have stated that the applicant would be required to include appropriate design measures in the development for energy and water conservation, sustainable drainage, sustainable/recycled materials and pollution control.</p> <p>SUDS (bottom of page 40) This section should be reworded, as the paragraph suggests that SUDS systems are not always viable. This is not the case, on new developments there always exists an opportunity to create a more sustainable drainage scheme than what currently exists. This section should commence with the phrase 'The council</p>	Support welcomed and comment in relation to SUDS accepted.	<p>Sustainable Urban Drainage Systems (SUDS) <u>The council will require the inclusion of sustainable urban drainage systems in all new developments in this area. Should A Drainage Impact Assessment prove that should be conducted to identify which</u> sustainable urban drainage systems are appropriate and viable in the re-development of the site. The Council will seek to secure the construction, maintenance and monitoring of such sustainable urban drainage systems and pollution control devices on the site through a planning obligations agreement.</p>

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		will require the inclusion of sustainable urban drainage systems in all new developments in this area'.		
	P44, Section 10 - Planning Application Requirements	We support the fact you have included land contamination and remediation strategy, waste management strategy and drainage impact assessment/drainage plan in this section.	Support welcomed.	None necessary
	<u>SUSTAINABILITY APPRAISAL</u>	<p>P8, Section 3 - Relationship to other plans, programmes and sustainability objectives - Table 3: Include Planning Policy Statement 9 (PPS9). PPS9 paragraph 12 states that networks of natural habitats are important for linking sites of biodiversity importance and to provide routes or stepping stones for migration, dispersal and genetic exchange of species in the wider environment. It says that local authorities should aim to maintain networks by avoiding or repairing the fragmentation and isolation of natural habitats through policies in plans. Such networks should be protected from development, and, where possible, strengthened by or integrated within it.</p> <p>PPS9 paragraph 13 states that in using previously developed land for new development, where such sites have significant biodiversity or geological interest of recognised local importance, local planning authorities and developers</p>	Comments noted.	These comments will be taken into account when the final Sustainability Appraisal Report on the adopted version of the SPD is produced.

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		<p>should aim to retain this interest or incorporate it into any development of the site.</p> <p>PPS9 paragraph 14 states that development proposals provide many opportunities for building in beneficial biodiversity or geological features as part of good design. When considering developments, it states that local planning authorities should maximise such opportunities in and around developments, using planning obligations where appropriate.</p> <p>Green space master planning We support a net increase in the quality and quantity of wildlife habitat in large-scale developments. However, for this to be effective and to maximise the benefits to wildlife, it is essential that a fully functional green space network be established. As such, green space within the development area, as a whole must be considered, as well as how the green space network within each development area inter-links with green space in adjacent areas. Planning green space on a site-by-site basis must be avoided to prevent piecemeal development and token habitat creation that may serve limited function because of, for example, isolation. Master planning the green</p>		

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		<p>space over the whole development area will also highlight more sensitive/ important wildlife areas, and therefore those sites that would benefit from less intensive built development. Similarly, sites that could take higher levels of built development could also be identified. It is important to acknowledge that to maximise benefits to wildlife, public access should be restricted in some areas.</p> <p>Green grid In addition to the above points, the 'green grid' approach should be adopted on a development area scale (not site-by-site basis). The green grid approach provides for a network of protected sites, nature reserves, green spaces and wildlife corridors that act as a buffer between urban areas and open countryside. Green grid explores the way green spaces connect by creating wildlife corridors that encourage flora and fauna to move and spread throughout an area.</p> <p>P15 and 16, Section 6 - Suggested SPD Objectives Apart from the 'Sustainable Development' objective (numbered as 13) there is no objective based on protecting/enhancing the natural environment. There should be at least one other objective which</p>		

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		concentrates purely on the natural environment, for example, incorporating the importance of SUDS and green roofs, remediation measures for contaminated land and enhancing natural landscape and biodiversity.		
12) Lella Durant of LB Brent Projects & Policy Team	Page 8, under section: "The developmental requirements identified during the options appraisal include the following commitments which are reinforced throughout the SPD;"	<p>Typo: minimise water taken 'form' instead of 'from' mains</p> <p>There is no mention of recycling / recyclable waste (although it is not definitive and is mentioned elsewhere)</p> <p>When talking about energy, should 'Ground source' heat pumps be specified, rather than just 'heat pumps'?</p>	<p>Typo to be amended.</p> <p>With regard to comment in relation to recycling – this issue is adequately covered through reference to waste management facilities.</p> <p>With regard to comment in relation to energy – this section reflects the exact list used by the GLA in the London Plan and the generic reference to 'heat pumps' is thought to be adequate.</p>	<ul style="list-style-type: none"> minimise water taken form <u>from</u> mains and maximise opportunities for the re-use of water;
	Section 7 Sustainable Development & Environmental Standards	<p>Also, p.13, are "site wieners" some kind of technical term I haven't heard of?! :</p> <p>Waste Any re-development will be required to provide adequate on-site facilities for the storage, recycling and handling of waste arising. Opportunities to provide integrated waste management facilities that would allow energy to be recovered from non-recyclable waste should be maximised. The site wieners have</p>	<p>Typo to be amended.</p> <p>With regard to comment in relation to Air Quality - no priority order is to be identified at this stage these issues can be better explored once the masterplanning / application process commences.</p> <p>Issues surrounding</p>	The site wieners <u>owners</u> have already embarked on a process of deconstruction and remediation with on site use of materials where possible.

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		<p>already embarked on a process of deconstruction and remediation with on site use of materials where possible.</p> <p>With regard to Air quality, the following section (p.14) talks about building orientation; how will this sit (in terms of priority) with orientation regarding maximising daylighting and passive solar design.</p> <p>I know there is a whole separate section on Connectivity, and I'm not sure if this section follows a format prescribed elsewhere e.g. EIA, but should there be some mention of sustainable travel (only footpaths are mentioned) in the Sustainable Development & Environmental Standards section (7), Environmental standards? Even if it's to reference cycle parking & paths and reduced car parking, and perhaps specifically linking them to the air quality section.</p>	<p>sustainable travel are adequately covered in the connectivity section where a requirement for a green travel plan is included.</p>	

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<p>13) Paul Ricketts of The Greater London Authority (GLA) on behalf of the GLA group; The GLA, the London Development Agency and Transport for London</p>		<p>As you know, members of the GLA group have been engaged with your officers on the formulation of the above SPD and it's subsequent sustainability appraisal. This co-operative work is welcome and your council is commended for undertaking the work. The general thrust of the document is supported. However, there are some changes that the GLA group suggests will need to be made to ensure that strategic concerns are more fully addressed. These relate in principal to the amount of work that prospective applicants should be required to do when applying for uses that are not recognised within the London Plan as being Strategic Employment Location (SEL) uses. Such work needs to recognise the importance of the Park Royal SEL and that the redevelopment of this significantly located and sized site requires a more comprehensive approach if the non-SEL uses (hospital-led and education-led) are to be the subject of a formal application. Although these uses are potential generators of employment, their location on this site will involve the loss of SEL and will need to be justified in the context of the London Plan and the Mayor's draft Industrial Capacity SPG (please see attached LDA comments for more specific comments).</p>	<p>Comment accepted</p>	<p>Section 8.2 Land Uses</p> <p><u>8.2.16 Criteria for the Release of Employment Land</u> <u>Applicants seeking to secure land uses not fully according with development plan policy will be required to supply material to justify the release of land from industrial employment uses. Such work may need to include the following; (this list is not exhaustive and further guidance will be provided during pre-application discussions with the Council and the GLA family):</u></p> <ul style="list-style-type: none"> • <u>illustrate that the employment capacity of the site is to be maintained;</u> • <u>demonstrate that the impact of such a release on the current demand / supply balance of industrial uses in Park Royal will be acceptable;</u> • <u>justification as to the exceptionality of this site making it eminently suitable for a mix of uses;</u> • <u>an assessment of the effective demand for this site for industrial employment uses;</u> • <u>illustrate that the previous floorspace and number of employees in industrial uses is to be at least maintained;</u> • <u>demonstrate that the scheme will be developed in such a way so that the industrial employment uses can</u>

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				<p>operate viably;</p> <ul style="list-style-type: none"> • <u>illustrate that the mix of uses proposed would not place unreasonable restrictions on the industrial employment uses;</u> • <u>provide evidence of the likely impact of a mixed use scheme of local land values and availability of land for industrial employment uses;</u> • <u>illustrate potential benefits of mixed use scheme to Park Royal as a whole including potential services and facilities benefits; and</u> • <u>demonstrate level of compliance with development plan policy and other strategies covering this area and commit to support the production of a framework for the whole of Park Royal.</u> <p>Section 10 Planning Application Requirements</p> <p><u>10.15 Planning Statement</u> A Planning Statement will be required to accompany any planning application to demonstrate how the proposals are consistent with development plan and supplementary planning guidance / documents and if relevant deal with the matters raised at paragraph 8.2.16 in relation to justifying the release of employment land.</p>

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		Page 3, end of first paragraph “this needs to be done in a manner that looks at the entire area”.	Comment accepted	It is essential that guidance is brought forward now so that this site does not lie vacant nor be re-developed without its significant opportunities being maximised <u>this needs to be done in a manner that looks at the entire area.</u>
		Page 6, new bullet points within roman numeral section XII – large scale community facilities for example public worship facilities; and uses that prevent the 24/7 operation of Park Royal for industrial employment and business purposes.	Comment accepted	I. The Following Uses are Not Acceptable on this Site <ul style="list-style-type: none"> • Large scale retailing including trade parks – small scale ancillary retail may be acceptable in the final mix of uses; • Large scale leisure including hotel development (Wembley is the sequentially preferable location for large scale leisure and hotel development and a hotel is proposed as part of the First Central proposals located by the approved Central Line underground station) - small scale ancillary leisure may be acceptable in the final mix of uses; • <u>large scale community facilities for example public worship facilities; and uses that prevent the 24/7 operation of Park Royal for industrial employment and business purposes;</u> • Housing – however, some provision directly related to uses

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				in the final mix may be appropriate e.g. housing including key-worker provision to support health uses at the North end of the site on the lorry park may be acceptable.
		Page 8, 4 th bullet point regarding housing development 2 nd line delete “that” and insert “will be of” and insert after “lifetime homes” “the word “standards”	Comment accepted	<ul style="list-style-type: none"> where any housing development is proposed - ensure that any new development would be fully accessible to disabled persons and that will be of lifetime homes standards <u>standards are incorporated</u>;
		Page 8, 13 th bullet point delete “wherever feasible” any failure to achieve the minimum 10% figure requires evidentiary justification and the SPD needs to show the preferred objective.	Comment accepted	Please see amendments made under respondent 8 - Simon Burton of Faber Maunsell on behalf of the London Energy Partnership
		Page 11 as regards references to other planning guidance the London Plan’s SPG: Accessible London also needs to be stated.	Comment accepted	Also the following items of Mayoral Guidance, supplementary to the London Plan are relevant; <ul style="list-style-type: none"> Accessible London SPG; and Draft Industrial Capacity SPG.
		Page 15, 8 th bullet point delete parenthesis and the words “for residential and commercial users” this is considered to be unnecessary and may suggest significant residential component.	Comment accepted	<ul style="list-style-type: none"> the provision of convenient communal waste management facilities (for residential and commercial users) within the redeveloped area; and
		Page 16, first bullet point insert “site within the overall” between the words “the” and “area”.	Comment accepted	<ul style="list-style-type: none"> To ensure comprehensive and integrated development of the site within the overall area;
		Page 19, 4 th bullet point insert after “human and built” “although this does not	Comment accepted	<ul style="list-style-type: none"> respect for context and setting and any residual neighbours both

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		rule out high quality contrast”.		human and built <u>although this does not rule out high quality contrast.</u>
		Page 19, penultimate paragraph commencing “Industrial and warehousing..” At the end of the second sentence after “existing uses” insert “or allow those uses to continue functioning without any adverse impact. Mitigation should be to the new use(s) and not to existing uses.”	Comment accepted	The edge conditions and neighbouring uses will determine the type, location and nature of any proposed new uses which must be compatible with the existing uses <u>or allow those uses to continue functioning without any adverse impact. Mitigation should be to the new use(s) and not to existing uses.</u>
		Page 22, 1 st bullet point insert at end of sentence “and improved links to the wider area”. New bullet points to include inclusive design and renewable energy should be added.	Comment accepted	<ul style="list-style-type: none"> • A comprehensive approach to the overall development of the site <u>and improved links to the wider area;</u>
		Page 22, New bullet points to include inclusive design and renewable energy should be added.	Comment accepted	<ul style="list-style-type: none"> • Inclusive design to be at the heart of all approaches; • The building design to specifically take into account the need for energy efficiency and the inclusion of building integrated renewables;
		Page 24, as regards the London Plan SEL policy the issue of not locating heavy industry at this former brewery site or environmental industries of recycling is not accepted. The land value for the site may very well rule out these uses. A comprehensive approach as referred to in the document as regards the masterplan for the Park Royal area will help in this area if environmental factors are the main determinants. As regards the SEL target of 10,000 jobs, this is considered to be a	Comment noted. Officers will amend this section to make the policy situation as set out by both the London Plan and the UDP clear as opposed to the Councils preference, which is to be clearly identified as not being a policy presumption against.	Park Royal is identified as both an IBP and a PIL. It is the Council’s contention that the brewery site falls, in terms of environment and public transport access, into the IBP category rather than, like much of Park Royal, the PIL category. <u>The Council would further suggest that due to this</u> Therefore , heavy or potentially polluting industrial uses are not <u>generally considered to be appropriate</u> in this location. In particular, <u>the Council considers that this</u>

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		minimum. As regards the draft industrial capacity SPG, this supports the need for more work on the wider Park Royal area.		would not <u>generally</u> be <u>considered to be</u> a suitable location for environmental industries of recycling and reprocessing of waste for example. <u>This reflects the Council's preference and does not represent a policy presumption against such uses. Indeed, there may be opportunities to locate some recycling industries in this location where they do not have an adverse environmental impact or negative effect on other high value uses. It is likely that any such uses would therefore need to be covered and meet all appropriate environmental standards.</u>
		Page 26, last sentence of paragraph regarding housing should read "Regard and compliance will also need to be had to lifetime home principles and standards".	Comment accepted	Any residential units will need to provide a mix in terms of type and tenure in accordance with UDP Policy H2 <i>Requirement for Affordable Housing</i> and H3 <i>Proportion of Affordable Housing Sought</i> . Regard will also need to be had to lifetime home principles <u>and standards</u> .
		Page 29, as regards connectivity, 5 th paragraph it will be helpful to mention the proximity to Harlesden station.	Comment accepted	Park Royal Underground Station (Piccadilly Line) is directly south of the site on the A40 accessed by a footpath and subway from Coronation Road. Hanger Lane Underground Station (Central Line) is located approximately 1 km to the west of the site, and Stonebridge Park Underground (Bakerloo line), and suburban (Silverlink Metro) line station is approximately 1.2 km to the north of the site, <u>and Harlesden Underground (Bakerloo line), and suburban (Silverlink Metro) line station is</u>

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				approximately 1.7 km to the north-east of the site.
		Page 33, add new bullet point “access statement enshrining inclusive design principles and factors”.	Comment accepted	<ul style="list-style-type: none"> • <u>access statement enshrining inclusive design principles and factors;</u>
		Page 41 as regards the Energy section, within the 6 th section of the second paragraph commencing “gas condensing boilers delete “(for as long as gas central heating remains more sustainable than electric heating)”.	Comment accepted	gas condensing boilers and gas central heating, for as long as gas central heating remains more sustainable than electric heating.
		Page 43, the point made within the Affordable Housing section that housing development must be fully accessible and designed to lifetime homes standards should also relate to open market housing.	Comment accepted	<u>Housing</u> Any housing development proposed must be fully accessible to disabled persons and be designed to Lifetime Homes standards. All affordable housing must be developed to the Housing Corporation’s Scheme Development Standards.
		Page 45, as regards the archaeological assessment: Is this just a desk-top study? Is it not possible that Diageo Plc can start this work bearing in mind the work that Brent Council has undertaken, in particular this SPD?	Comment noted	None necessary
		Page 46 as regards the urban design framework, add a new bullet point for an access statement or include specifically within “Movement strategy”.	Comment accepted	<ul style="list-style-type: none"> • <u>Movement strategy;</u> <u>and</u> • <u>Access statement.</u>
		I have also attached detailed comments from my colleagues in the LDA and TfL regarding strategic employment land and transport uses.	Comment noted	None necessary

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		As you are aware all SPDs are expected to be in general conformity with the London Plan under the new Planning and Compulsory Purchase Act 2004. Please forgive the detailed nature of the majority of the comments in this response, but there are some issues that could benefit from further clarification within the document. Given the co-operative working that has taken place, so far, on the document, it is envisaged that any substantive issues can be resolved before the final version of the SPD is produced to ensure general conformity with the London Plan. In addition, discussions with your Council and those adjacent to explore the potential for joint production of an Opportunity Area Planning Framework for Park Royal would be most beneficial.	Comment noted. The Council supports and would welcome the production of an Opportunity Area Planning Framework for Park Royal. However Officers feel that there is a need to respond to this immediately available site which could not have taken place under the timescale for the production of an Opportunity Area Planning Framework for Park Royal.	None necessary
		I trust that these comments, although detailed, will be of assistance to you and look forward to continued co-operative working on this important strategic site.	Comment noted	None necessary
LDA Detail		The London Development Agency recognises the need to address the immediate issue of the closure of the Guinness Brewery as well as the opportunity that this represents in terms of maximising the use of this accessible location. However, the LDA is concerned that the context of the wider Park Royal Industrial Estate has not been satisfactorily addressed by the draft SPD	The Council supports and would welcome the production of an Opportunity Area Planning Framework for Park Royal. However Officers feel that there is a need to respond to this immediately available site which could not have taken place under the timescale for	None necessary

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		<p>and that the approach being undertaken does not represent a comprehensive planning of this wider area, one on the London Plan's Opportunity Areas.</p> <p>In order to achieve the draft SPD's objective to provide a significant increase in employment, the document indicates that non-SEL uses, namely education and hospital uses, should be able to provide a significant part of future development proposals. Such uses are themselves potential generators of employment. However, as a matter of principle and in context of both the Mayor's London Plan and draft Industrial Capacity SPG, the LDA normally opposes any loss of Strategic Employment Land to other uses. Particularly in those areas where the availability of employment sites is limited. At this location, the Agency is concerned about the rate of industrial land release in West London and the development pressures on remaining industrial and employment sites.</p> <p>As is set out in the draft SPD, Park Royal is an SEL, of which the former Guinness Brewery site forms a significant part. Park Royal is also an LDA priority area and provides a variety of employment opportunities in a deprived area. Demand for industrial space is tight relative to</p>	<p>the production of an Opportunity Area Planning Framework for Park Royal.</p> <p>Officers accept that that the approach being undertaken does not represent a comprehensive planning of this wider area as this document is a site brief and cannot by definition provide this.</p> <p>Further more the SPD has had due regard to London Plan Policies, the draft Industrial Capacity SPG, and the draft SRDF and is indeed seeking apply their thrust though maximising the opportunities presented by the emerging highly accessible location.</p> <p>Officers accept that the Brewery site forms a significant part of an employment area. It is not proposed that the site be lost to employment uses. Instead, the draft document seeks to maintain and indeed enhance the employment (in</p>	

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		<p>supply and vacancies are low.</p> <p>London Plan policies 2A.7 and 3B.5 promote and aim to protect SELs as London’s strategic pool of industrial employment land. Evidence suggests that under the latter policy, Park Royal should be nothing other – at least into the medium term – than an SEL. The Mayor’s draft Industrial Capacity SPG places London Boroughs within three categories of industrial land release. The London Borough of Brent is placed within the “limited transfer of poorer industrial sites” category. This is not reflected in the draft SPD.</p> <p>In addition, the draft SRDF for West London suggests that boroughs “...<i>should not release significant industrial sites (generally over 0.5 ha) until these are tested against strategic and local needs and policies for waste management facilities.</i>” While the draft SRDF proposes that boroughs should review the indicative boundaries of SELs it also states that the “...<i>development of significant non-business uses within them should be resisted.</i>” Annex 2 of the draft SRDF strengthens the case for business uses and flags concerns over any threats to this business offer.</p>	<p>the traditional sense) capacity of the site whilst allowing the introduction of additional uses which will maximise the numbers employed on the site making best use of the transport accessibility.</p> <p>The draft document does reflect the draft Industrial Capacity SPG categorisation for Brent; indeed it was repeated at section 8.2 <i>Land Uses</i>.</p> <p>Officers also emphasise that this document cannot and does not seek to alter development plan policy. The site remains designated primarily for B2 (General Industry) and B8 (Storage and Distribution) purposes. It does not therefore impinge upon the policy presumption in favour of such uses.</p> <p>In partnership with adjacent West London Boroughs the Council has commenced on an analysis of sites for waste uses for inclusion within the LDF; this work is not yet</p>	

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			<p>sufficiently advanced to bear weight on this document. However, the London Plan and UDP policy designations would permit the introduction of waste uses should such an application be forthcoming. As this document cannot, and does not seek to change this designation the site remains capable of containing some waste uses.</p>	
		<p>Within this context, therefore, the LDA supports the urgent need for the production of an Opportunity Area Framework to guide development in Park Royal and avoid piecemeal development which erodes its' unique business offer while maximising the potential of some sites. In the absence of such a framework, the draft SPD should require that future development proposals:</p> <ul style="list-style-type: none"> ▪ Show how it would not leave a shortfall of industrial employment land at the site when compared with current and future demand for industry and related activities in the area. The development options indicated in the draft SPD could potentially result in a loss of industrial land in an area of low vacancy. 	<p>This document seeks not to erode but to enhance the unique business offer of Park Royal.</p> <p>Officers welcome the LDAs opinion that in the absence of the production of an Opportunity Area Framework to guide development in Park Royal the draft document can come forward with the introduction of an indication of the amount of work that prospective applicants should be required to do when applying for uses that are not recognised within the London Plan as being Strategic Employment Location (SEL) uses. In accordance with</p>	<p>Please see the first amendment made under respondent 13 - Paul Ricketts of The Greater London Authority (GLA) on behalf of the GLA group; The GLA, the London Development Agency and Transport for London.</p>

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		<ul style="list-style-type: none"> ▪ Demonstrates that the cumulative effects of development of employment sites in the Park Royal area for mixed use schemes or other uses would be acceptable by relating demand for sites and premises for industrial and related activities to supply and by taking account of the potential loss of similar sites to the former Guinness Brewery site. ▪ Justify how the former Guinness Brewery site is considered to be less suited to wholly employment uses than others. ▪ Set out what evidence exists for adequate marketing of the site for industrial uses. The Agency would expect to see details of a marketing history including information on which users and uses were targeted and how; What value the site has been marketed at; How long the site has been marketed for etc.; What types of use for the site were considered and why non-industrial and non-SEL uses were rejected. ▪ Demonstrate that there will be no net loss of space for industrial and related activities and jobs in these sectors. 	<p>comments made by the GLA Officers accept that such work needs to recognise the importance of the Park Royal SEL and that the redevelopment of this significantly located and sized site requires a more comprehensive approach if the non-SEL uses (hospital-led and education-led) are to be the subject of a formal application.</p>	

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		<ul style="list-style-type: none"> ▪ Include safeguards to enable industrial and related users to occupy space at the site and that such uses and activities can operate viably. ▪ In terms of introducing non employment uses, in particular sensitive uses, demonstrate what the impact of this would be on the operations of industrial and related businesses on the site itself as well as the wider area, and propose safeguards to ensure that there would be no adverse effect. ▪ Demonstrate how development proposals would not impact upon industrial land values in the area and the availability of premises for such activities in consequence of hope that consent for higher value uses could be obtained, particularly given that Park Royal is currently an affordable industrial area. ▪ Set out what benefits other uses would bring to the site and to Park Royal generally and in particular the potential benefits for the industrial and related businesses. ▪ Demonstrate of how (if at all) this scheme complies with 		

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		<p>Development Plan policy and objectives for this part of Park Royal and how it responds to the strategy for the area put forward by the Park Royal Partnership.</p> <p>The Agency would also suggest that the applicant commits to making a financial contribution to the development of the Opportunity Area Framework for the whole of Park Royal which would provide the context for the development of this site as well as others in the area.</p> <ul style="list-style-type: none"> ▪ Given the inadequacy of some services and facilities in this area for employees, demonstrate the contribution the scheme would make to addressing this issue including consideration of the provision of additional facilities, directly and/or through support for provision elsewhere to support employment uses and employees for example child care provision, training centre. 		
TfL detail		The Guinness Brewery Site, Supplementary Planning Document and Planning Position Statement, Consultation Draft states that alterations to the 224 and PR2 bus routes will increase the sites PTAL score from 2 to 3, to 3 to 4. TfL queries this statement because it seems	As the draft SPD states, the increase in the PTAL rating for the site does follow the opening of the new Park Royal interchange (incl. the new Central line station) – not just the extension to two	None necessary

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		unlikely that PTAL scores will change as a result of two bus routes. Usually major improvements to public transport provision, such as the installation of a new interchange are needed to change PTAL scores. TfL suggests that this aspect of the work is revisited and discussed with TfL before the final version of the document is published.	existing bus routes. Any help they can offer in mapping PTAL values across the site to reflect future public transport improvements would be welcomed though.	
		TfL will like further information on the relationship between the proposed car parking standards for B1 uses in the document and their relationship to PTALS. TfL is keen to ensure that car parking standards relate to PTALS in line with the range contained within Annex 4 of the London Plan. Clarification on this will be welcomed.	The UDP parking standards for employment uses don't directly relate to PTAL values, but are more restrictive when sites are located in town centre areas. In the case of Park Royal (being outside any town centre) a general standard of 1 space per 150m ² (with a regeneration exception of one space per 100m ² if significant public transport improvements are secured) applies, which is within the range of one space per 100m ² -600m ² set out in Annex 4 of the London Plan.	None necessary
		Chapters 8 and 10 of the LBB working draft advocate the provision of a north-south public transport corridor either wholly to the east of the rail sidings or running via the centre of the development (as a variant to the approved Rainsford Road link), to provide a direct link	Following Officer discussions with Diageo, it is now looking more likely that bus lanes will be provided along the Rainsford Road link, rather than a dedicated bus only corridor, so some of the	Section 8.4 Connectivity 8.4.10 A right of way via the Guinness site sidings route between Twyford Abbey Road and First Central <u>may be necessary</u> is crucial to <u>secure</u> the second phase of the Transit proposal, where a busway or

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		<p>between Twyford Abbey Road and Coronation Road, potentially to be served by Wembley – Park Royal Transit route. TfL notes that the consultation draft only requires the safeguarding of a 5.5 metres wide corridor for the transit scheme; TfL considers this width to be insufficient for two-way bus operation, particularly by non-guided vehicles. TfL requests that the brief be modified to secure a corridor of at least 9.3 metres, to accommodate a 7.3 metres wide roadway and 1 metre wide paved edge strips where signs and street furniture can be safely located. On curves, wider edge strips may be required to provide adequate forward visibility. TfL will welcome further discussions on the details of the proposed transit scheme, particularly in terms of funding issues.</p>	<p>above comments may no longer be relevant. Officers are in discussions with TfL regarding the potential transit scheme.</p>	<p>ultimately tram link is envisaged. <u>Alternatively, the scheme may require bus lanes to be provided along the Rainsford Road.</u> This will affect any entrances to the site from the east, where conflicts between the Transit route and site accesses will need to be designed to operate safely. However it may be possible to include a station / stop along the eastern edge of the development, in the vicinity of Cumberland Avenue, which would bring a huge benefit in public transport access to the location. The Transit proposal will provide a direct link initially with 7 and ultimately up to 14 tube and rail routes, including fast access to Heathrow via Ealing Broadway. The strip width <u>potentially required cannot be quantified at this stage</u> would be around 5.5 metres for a twin track busway or tram line.</p> <p>Figures 9 and 11 will be amended to reflect this.</p> <p>Section 9 Planning Obligations</p> <p>A right of way <u>may</u> will be required via the Guinness site between Twyford Abbey Road and First Central to facilitate This is crucial to the second phase of the Wembley-Park Royal Transit proposal, where a busway or ultimately tram link is envisaged. This will affect the Cumberland Avenue entrance to the site, where a crossing <u>may</u> will be</p>

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				<p>necessary. In the long term, it may be possible to include a station/stop at this point, which would bring a huge benefit in public transport access to the site itself providing a direct link with initially 7 and ultimately up to 14 tube and rail routes, including fast access to Heathrow via Ealing Broadway. The strip width required would be approximately 5.5 metres for a twin track busway or tram line <u>cannot be quantified at this stage</u>. The Council will require that <u>any</u> land set aside for this purpose must be landscaped and made safe in the interim.</p>
		<p>TfL has a strategy to bring all London bus stops up to LBI accessibility standards, including the provision of high kerbs to assist disabled passengers and red-surfaced clearways to discourage parking at bus stops. TfL will expect all bus stops within or close to any potential development be provided to LBI accessibility standards, and may seek a section 106 contribution from developers to facilitate the upgrading of bus stops as part of any future planning applications. It will be helpful to include a reference to this in the document.</p>	<p>Comment noted</p>	<p>Section 8.4 Connectivity</p> <p><u>TfL has a strategy to bring all London bus stops up to LBI accessibility standards, including the provision of high kerbs to assist disabled passengers and red-surfaced clearways to discourage parking at bus stops. TfL will expect all bus stops within or close to any potential development be provided to LBI accessibility standards.</u></p> <p>Section 9 Planning Obligations</p> <p><u>TfL will expect all bus stops within or close to any potential development be provided to LBI accessibility standards, and may seek a section 106 contribution from developers to facilitate the upgrading of bus stops as part of any future planning applications.</u></p>
		<p>The SPD mentions changes to the 224</p>	<p>The changes to the 224 and</p>	<p>None necessary</p>

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		and PR2 bus routes. Alterations to the bus network will depend on the land use and what trip generation that occurs as a result of development. TfL will evaluate changes to the bus network based on the TA, and projected trip rates. TfL will welcome further and more detailed discussions on these aspects.	PR2 bus services to serve the First Central development and new Park Royal interchange were envisaged as part of the First Central Business Park application, with S106 money totalling £2m being provided to extend/divert bus services to the interchange. Obviously bus services in the area have developed in the seven years since the original application was submitted and what was envisaged back then may no longer be appropriate. However, TfL need to be aware that they have previously given tacit approval to the changes to the 224 and PR2 services and any changes to previously agreed service alterations need to be carefully considered. Any guidance TfL are able to give on suitable bus network alterations to serve this development would be welcomed.	
		TfL Bus Network Development work to planning capacities rather than total capacity when assessing the bus network	Comment noted	None necessary

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		and it is advisable for developers to use a planning capacity of 70 people for double deckers, 43 people for standard single deckers and 35 people for small single deckers.		
		<p>TfL will require that any new development on the former Guinness Brewery site is fully intergated with local pedestrian and cycle links. These pedestrian routes must connect to established and planned transport nodes and interchanges.</p> <p>A cause for concern is the current pedestrian link between the site and Park Royal tube station to the south. This link, known as 'Masons Green Lane', consists of an underpass beneath the A40 and then a bridge over railway sidings to another underpass on Coronation Road. This might be a direct link but it is undesirable from an accessibility and mobility standpoint for those on foot. Ideally the crossings should be at grade, both for ease of movement, particularly for those with mobility impairments such as wheelchair users and also from a safety and security viewpoint, as underpasses in particular hold personal safety concerns for pedestrians.</p>	<p>Comment noted – the SPD already covers these matters.</p> <p>The Masons Green Lane link and subway under Coronation Road is already provided and has ramps at either end to facilitate wheelchair and cyclist access. This link has been approved and provided as part of the First Central permission and Officers cannot see how we could usefully amend matters now, other than to ensure lighting and security cameras make the route as safe to use as possible.</p>	None necessary
		A controlled pedestrian crossing at the junction of Coronation Road and Abbery Road will be desirable from a pedestrian safety standpoint and will further improve	This is shortly to be provided by Central Middlesex Hospital as part of the changes to the junction required to service	None necessary

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		pedestrian linkages and permeability around the site.	the BeCAD development.	
		Any new carriageways constructed as part of the redevelopment of the Former Guinness Brewery should have footways provided on both sides with adequate street lighting and surveillance with as much 'overlooking' as possible within the context of the land use of the redevelopment.	Comment noted	<p>Section 8.4 Connectivity</p> <p>UDP policy TRN14 <i>Highway Design</i> requires that new highway layouts, visibility splays and access to and within development should be designed to a satisfactory standard in terms of safety, function, acceptable speeds, lighting and appearance. Building upon the framework set out in Section 8 <i>Urban Form and Design Requirements</i> the new road network should have efficient internal circulation as well as integrating with the existing, and proposed, road network in a convenient manner; including for emergency service vehicles, pedestrians, cyclists and, where appropriate, buses. The roads to be used by buses should have access points, roads, stop locations and highway layouts suitable for the routing of bus services, and for pedestrians. <u>Any new carriageways constructed should have footways provided on both sides with adequate street lighting and surveillance with as much 'overlooking' as possible within the context of the land use of the redevelopment.</u></p>
		Cycle routes throughout the Guinness Brewery redevelopment should be a requirement, possibly with delineated cycle lanes to help establish cycle priority.	Comment noted - the SPD already covers these matters	None necessary
		The dedicated cycle route adjacent to the	See comments regarding	None necessary

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		pedestrian link under the A40 to the proposed new tube station is a positive proposal. However, the potential requirement for cyclists to dismount if using the underpass is not ideal and does not contribute to a direct, speedy, continuous and safe cycle route. The underpass is not ideal for reasons listed in the walking section and possible alternatives should be explored.	Masons Green Lane above. Officers consider it too late to be considering major changes to this link. Wide ramps are provided to the subway on Coronation Road and these could accommodate cyclists without them needing to dismount, if desired.	
		New employment sites should have provision for secure cycle parking and storage as well as shower and changing facilities. Cycle parking should be provided in line with standards outlined in the LCN Design Manual.	Comments noted. The SPD already covers this point, but should be expanded upon to mention LCN standards (although these are the same as the UDP standards).	Section 8.4 Connectivity <u>Cycle parking should be provided in line with standards outlined in the LCN Design Manual.</u>
		The recognition of the need for a Green Travel Plan for site employers and employees is a positive development and this must be carried forward through more concrete proposals to help ensure walking and cycling are viewed as viable travel modes for journeys to work. The travel plan should include details of routes and innovative ideas such as loans for cycle purchase.	Noted – SPD should be expanded to emphasise this issue.	Section 10 Planning Application Requirements It should cover all modes of transport including public transport, walking, and cycling <u>and provide details of routes and innovative ideas such as loans for cycle purchase and season tickets.</u>
		TfL will require a detailed Transport Assessment for any planning applications submitted for this site. The TA should include a modal split of travel patterns using TRICS and TRAVL. It should also include a study of traffic generation and road junctions affected by the	Comment Accepted	Section 10 Planning Application Requirements <u>10.14 Transport Assessment (including Green Travel Plan)</u> A formal Transport Impact Assessment will be required, providing information on the

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		development. The TA should include figures for car parking provision; these standards should be in line with Annex 4 of the London Plan. The TA should also indicate cycle parking, which should be in line with the London Cycle Network (LCN) Design Manual. The TA should also include impacts that any proposed development has on the public transport network, expressed as person trips. A modal share for all land uses, as well as details of total floor spaces or unit numbers for all land uses, should be included.		range of transport conditions both before and after the proposed development has been built including details on how existing conditions are likely to change as a result of surrounding committed developments i.e. First Central scheme and transportation proposals in the area. It should cover all modes of transport including public transport, walking, cycling and provide details of routes and innovative ideas such as loans for cycle purchase and season tickets. If a full EIA is not required then the transport assessment must also cover the effect of additional traffic on air pollution and noise. <u>The TA should include a modal split of travel patterns using TRICS and TRAVL. It should also include a study of traffic generation and road junctions affected by the development. The TA should include figures for car parking provision; these standards should be in line with Annex 4 of the London Plan. The TA should also indicate cycle parking, which should be in line with the London Cycle Network (LCN) Design Manual. The TA should also include impacts that any proposed development has on the public transport network, expressed as person trips. A modal share for all land uses, as well as details of total floor spaces or unit numbers for all land uses, should be included.</u>
14) Simon Jay of Park Royal	General summary	Thank you for the opportunity to comment on the above document.	Support welcomed	None necessary

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Partnership		<p>Park Royal Partnership supports the overall approach, structure and content of the draft SPD for the former Guinness Brewery Site. It provides a strong yet sufficiently flexible framework to guide development principles on this important Park Royal gateway site. The context of the document recognises that the market is best placed to understand current demand and what will be viable on the site, and it is to be welcomed that the document is not over restrictive in terms of possible employment generating uses on the site. It should help provide certainty and confidence to potential developers of the site in this respect.</p> <p>However, it also provides good protection of the site against unsuitable uses, and makes very clear that quality, sustainable development is being sought at this location.</p> <p>If the principles are adhered to in a future planning application, the SPD will have made a significant contribution to securing development</p>		

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		on the site that will have regeneration and employment benefits for many years.		
	SPD Objectives	PRP agrees broadly with the objectives behind the SPD and is particularly keen to ensure that the development of the site is undertaken in a comprehensive and integrated manner, as advocated in the document. Piecemeal development of the site should be strongly discouraged in as far as the planning system can control this. We welcome the need for a Development Framework including a Masterplan for the next phase of work. PRP will be keen to discuss the development of this with the new landowner once they are known, hopefully by the early part of 2006.	Support welcomed	None necessary
	Strategic development options	PRP agrees that the 6 broad development options put forward in the SPD are the correct ones for this site. There is sufficient flexibility here for a developer to put forward detailed proposals that stack up in terms of market viability, and still meet the SPD's strategic objectives. PRP shares the vision of the guidance for high quality mixed use and high	Support welcomed	None necessary

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		<p>employment generating uses on this site. It is likely to be a market reality that a significant element of any future planning application will be for industrial uses. It is of course possible to secure high employment generating industrial uses as evidenced elsewhere in Park Royal, particularly in production industries. There may be scope for PRP working with a future developer of the site to ensure the mix of industrial uses and unit sizes best meets the requirements of Park Royal businesses on the ground. PRP is already working with the main business sectors in Park Royal, including the food industry, TV and Film and logistics and distribution, as well as big industrial developers to better understand and cater for current and future space requirements.</p>		
	Transport and local access requirements	<p>PRP welcomes the proposal to develop a new estate access road from Coronation Road through to Rainsford Road via Cumberland Avenue. As well as improving access to large parts of the estate, it could also assist with tackling traffic</p>	<p>Comments noted. Officers consider that issues relating to traffic calming measures have been adequately addressed within the draft document.</p>	<p>None necessary</p>

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		<p>congestion on Coronation Road on the approach to central Park Royal. Measures should be introduced to ensure that the new link road does not become a north- south rat run through the estate.</p> <p>The site has the potential to make a contribution to improving public transport in the wider Park Royal area through planning obligations and provision of infrastructure. We support the inclusion of the requirement of land to facilitate the Wembley- Park Royal Fast Bus scheme, and for bus layover facility adjacent to Coronation Road.</p> <p>The developer should include plan for a suitable pedestrian and cycle link between Park Royal Interchange Station and the site. If this can't be achieved at grade across Coronation Road then an appropriate tunnel facility should be considered in the same manner as that provided for the First Central development.</p> <p>A fuller transport assessment should be prepared that amplifies the</p>		

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		<p>Council's transport requirements set out in the SPD. PRP would welcome the opportunity to be consulted on the detail of this.</p> <p>It is our belief that the developer of the brewery site should be required to make a contribution to the proposed Park Royal interchange station on the Central Line and potentially new or existing TfL bus services in the area. A fast and frequent bus service or services will be vitally important in linking the new Park Royal Station on the Central Line with the relatively poorly served centre of Park Royal.</p>	<p>The current preference is for improvements to bus services. This is because the delivery of the new Central line station lies with the owners of the First Cenrtal scheme, as it was a condition of that permission.</p>	
	Planning Framework for Park Royal 'Opportunity Area'	<p>As identified in the document there is a requirement for a cross borough planning framework outlined in both the London Plan and the West London SRDF. Whilst the timing is such that this planning framework will be unlikely to influence planning principles on the site, there is existing robust policy in place already so this shouldn't be too much of an issue. Clearly though there is a need to ensure that whatever is proposed on the site meets the overall of the whole Park Royal and surrounding area. It</p>	<p>Support welcomed</p>	<p>None necessary</p>

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		is our belief that development on the scale and potential uses set out in the SPD will be entirely appropriate to Park Royal.		
	Planning Obligations	<p>Guidance on the potential planning obligations relating to the site is comprehensive and is supported by PRP. PRP welcome the opportunity to be consulted on the development of the site travel plan so that estate wide measures currently being operated by PRP might be built in. We mention above the requirement for the developer to make a contribution to the Park Royal interchange station and bus services. If feasible this should also include the proposed Fast Bus service between Wembley and Park Royal.</p> <p>The developer should provide suitable on- site public open space and landscaping with an appropriate ongoing management regime. PRP welcomes the requirement for a contribution to the Park Royal Trees project. We are keen to discuss the specifics of this with the relevant planning officer in due course.</p>	Comments noted	None necessary

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		<p>The SPD outlines that financial contributions for employment and training will be sought from the developer to be delivered via Brent into work partnership. PRP also offers a local job brokerage service, specifically tailored for local people to access jobs on the Park Royal estate. We would be keen to explore opportunities for any funding to contribute to this job brokerage facility.</p>		
	<p>PRP's role going forward</p>	<p>It may be appropriate to set out briefly how PRP sees its role going forward in relation to the site.</p> <ul style="list-style-type: none"> • To add value by working with the developer to better align their proposals with what Park Royal businesses really need through our City Growth Research. This may include looking at opportunities to provide suitable accommodation to support priority sectors in Park Royal. • To work with the developer and stakeholders including the Brent, LDA and GLA to develop Masterplan proposals for the site. 	<p>Although these matters are not reflected in changes to the draft document the Council welcomes the role of PRP in the areas identified and welcome the continuation of the partnership working approach as development proposals for the site are progressed.</p>	<p>None necessary</p>

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		<ul style="list-style-type: none"> • To explore opportunities for regeneration funding from LDA and other sources to support the scheme and western gateway generally. This could include funding for transport, infrastructure and public realm projects. This is addition to financial contributions secured through developer. • To assist in marketing of the site as part of the Park Royal inward investment offer, We are keen to work with others in this respect including Think London. • To assist end users of the site through introducing the Park Royal membership offer. • To add value through co- ordination of project proposals and funding using local knowledge and relations. 		
15) Sam Richards of TfL		I am writing to add further comments to those sent by Paul Ricketts of the Greater London Authority sent on the 27 th October 2005. These comments relate to more detailed aspects from a	Officers do not consider that these views alter the Council's approach to the re-development of this site. It is our understanding that station will be provided by the	None necessary

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		<p>TfL/ London Underground perspective associated with the proposed Park Road station on the Central Line. I apologise that these comments are outside of your deadline but I trust that they can be taken into account.</p> <p>TfL would like more discussions and information about the current status of the proposed new Park Royal Station on the Central line as mentioned in this document.</p> <p>It is understood that outline planning permission for the proposed station was granted in 1999, which was connected to the 3rd phase of the First Central development; phase 1 of which appears to have been completed, and any further information about when phase 3 is anticipated, especially if there is a risk that phase 3 will not take place.</p> <p>TfL does not appear to have a copy of the outline planning permission, nor the associated Section 106 agreement associated with the new station, although I understand that this is now being forwarded. TfL would</p>	<p>owners of the First Central scheme, therefore there is no reason to question its provision. The nature of the station to be provided is a matter for between LUL and the owners of the First Central scheme.</p>	

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		<p>appreciate knowledge of the conditions of the permission, and details of how the station is to be funded. In particular, clarification on whether or not a specific funding sum was included in the legal agreement, or if a more general clause was included which requires the developer to fund the entire cost of the station, or if a capped amount was included on the legal agreement.</p> <p>It is understood that detailed planning permission was granted on 26 August 2004. Again, TfL does not have a copy of this permission and would appreciate details being forwarded to the Land Use Planning team at TfL. It is recognised that London Underground wrote in response to consultations to this planning application in its letter dated 1 July 2002. The letter stated that London Underground supports the proposals for a new station, and at that time could support an application on the basis of the design then approved. The letter went on to point out that progress with developing the station proposals further towards a more</p>		

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		<p>detailed design stage is subject to substantial further work to ensure that the requisite agreements between stakeholders are in place.</p> <p>TfL is concerned that no further work has been progressed since 2002 on station design or the drafting of the required agreements. At present, only a memorandum of understanding exists.</p> <p>TfL note that the letter was written in 2002 which pre- dates any plans to convert the Guinness site. The outline design for the station, which was granted planning permission in 2004 does not take this increase in development into consideration. There id therefore a significant risk that the proposed station may not be sufficiently large enough to cope with anticipated growth. This may also increase the costs of the station.</p> <p>TfL is concerned about the length of time that the details associated with the approved station is taking, which may lead to problems with the details no longer complying with current</p>		

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		<p>standards, and may cause cost increases.</p> <p>As a result of the time delays in agreeing details of the station, as well as increased aspirations for development, it is likely that design work previously completed is now out of date with regard to current requirements and standards, as will any previous costing work. TfL is also concerned that any funding agreements with the developer, set in the original legal agreement, may now be insufficient to cover the full station costs, taking into account increased capacity requirements. TfL does not consider, therefore, that comments in the SPD which relate to the station "being secured" are entirely accurate. Whilst it is clear that planning permission has been granted for the station, there is no agreement as yet to construct the station between London Underground and the developer, as a result of the lack of progress with details outlined above.</p>		
		Because of the uncertainty associated with the station, TfL advise that the document makes it clear that the	There is a permitted scheme to be developed at an agreed trigger point. The Council	None necessary

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		station has not yet been fully secured in terms of design details, funding, and adherence to current standards with London Underground. Any developments within the SPD area should consider development options that exclude the new station, as well as considering scenarios which include the station.	understands that this will be delivered to LUL's requirements.	
		Little reference has been made regarding the ability of the transport infrastructure to cope with increased demand should the First Central Development 3 rd phase not proceed. TfL considers that including this scenario in the document should be considered.	Any Transport Assessment attached to any scheme proposed will deal with these matters.	None necessary
		TfL considers that an assessment would be needed to ensure there is spare capacity within the First Central transport improvements to cater for additional development within area, including the Guinness redevelopment area. The Guinness site should be reviewed with all other proposed development within the area, including the Gypsy Corner site which is currently impacting on North Acton station.	Any Transport Assessment attached to any scheme proposed will deal with these matters.	None necessary
		In conclusion, TfL wish to clarify that	This is outside the scope of	None necessary

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		London Underground have no funding available for any new station works at Park Royal and would expect the scheme to be fully developer funded. Detailed design work, funding details and negotiations regarding formal agreements have not been forthcoming from the developer. As a result TfL is concerned that further delay will increase costs and may result in the station not being deliverable.	this brief. Officers understand that detailed design work has been agreed with LB Ealing.	
		TfL would urge that more detailed discussions on these aspects and their impact on the SPD take place as a matter of urgency.	Officers welcome further discussions.	None necessary
Planning Committee (Policy)	Uses	The Planning Committee (Policy) approved the document but asked that the Council's Executive amend the SPD / PPS to say that the Guinness Brewery site be considered for educational uses.	The discussion at Planning Committee (Policy) centred around whether the site was suitable for a school. The SPD / PPS currently allows for an educational use but your Officers recommend an alternative further alteration in order to clarify the purpose of the SPD / PPS in respect of education. The Planning Committee (Policy) consider the site to be a	<p>- Educational use to maximise employment growth sector linkages wherever possible and should be led by related skilled industrial investment and production</p> <p><u>- While a Primary or Secondary School is not considered appropriate at this location, educational uses at a tertiary level that build upon the good sub-regional transport links and are functionally related to the activities in Park Royal would be welcomed.</u></p>

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			<p>good potential site for a school. When the document was written Officers intended the site for a post 16 (tertiary) educational use for the reasons set out below;</p> <ul style="list-style-type: none"> • the site is not considered a good location for a secondary school. This is because; <ul style="list-style-type: none"> ○ it is located in the middle of an industrial estate; ○ transport links are improving but they are not as good as alternative sites such as Wembley Park; ○ the existing and proposed transport routes are aligned east - west (Central and Piccadilly lines), these stations would serve Ealing rather than Brent; and ○ moreover, the station most affected, Alperton, could be in direct competition with Alperton High School. 	

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			<ul style="list-style-type: none"> • In contrast a tertiary post 16 education establishment would draw from a wider region and could therefore appropriately exploit existing and proposed transport links; • Secondly there is a functional fit between a vocational type educational establishment and the activities located within Park Royal. 	