

APPENDIX 1B: Drafted Version put Forward for Approval

Guinness Brewery Site

Combined Supplementary Planning Document and Planning Position Statement

Version put forward for Approval



Prepared by Brent Council

November 2005

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1. Executive Summary

1.1 Brewing production on the Guinness Brewery site in Park Royal ceased at the end of June 2005 and clearance of the site will soon commence. The Council needs to consider the future use of this key 8 Ha (20 acre) 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 a significant opportunity site has in the regeneration of Park Royal. 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.

1.2 The overarching aim of the SPD is to secure the prompt redevelopment of the Guinness Brewery site which presents a major opportunity of sub-regional significance to contribute towards the London Plan target of 10,000 new jobs to 2016 in Park Royal. This site offers a unique chance to reinforce a major gateway to Park Royal and provide a significant increase in employment. In particular, therefore, the SPD seeks to ensure that the re-development encompasses innovative, high quality and sustainable design, construction and operation, maximises public transport opportunities and brings tangible and long lasting employment benefits to Brent and its surrounding Boroughs.

1.3 A range of strategic options capable of achieving this have been considered:

- A) Hospital led
- B) Education led
- C) Hospital & Education mix led
- D) Storage or Distribution (B8)
- E) General Industrial (B2)
- F) Mix of all B uses

1.4 This SPD explores the policy framework relevant to the development of these uses on the SPD site and specifies the particular requirements that any planning application would have to satisfy.

2. Introduction

2.1 A number and range of factors have led to the production of this Supplementary Planning Document (SPD). Firstly; notification that production and the Guinness brewery was to halt. Reference to the existing Unitary Development Plan (UDP) site designation does not adequately assist in the consideration of the redevelopment of the site as it was made in anticipation that the brewery was to remain. Since the time that this site designation was last fully considered a continued development of public transport and other links has taken shape. Furthermore, the adjacent site is now being developed as a high quality office park. All of these factors in unison led to the conclusion that that the production of an SPD would provide an opportunity to check and re-evaluate the land use designation of this site. It was considered important that any such checking was carried out in light of its effects on the adjacent B1 (Business) office development and residential development and fully consider whether there are any opportunities developing from the public transport improvements that would aid re-generation of the area and enable the capture of other employment benefits.

2.2 The overarching aim of the SPD is to secure the prompt redevelopment of the Guinness Brewery site which presents a major opportunity of sub-regional significance to contribute towards the London Plan target of 10,000 new jobs to 2016 in Park Royal. This site offers a unique chance to reinforce a major gateway to Park Royal and provide a significant increase in employment. In particular, therefore, the SPD seeks to ensure that the re-development encompasses innovative, high quality and sustainable design, construction and operation, maximises public transport opportunities and brings tangible and long lasting employment benefits to Brent and its surrounding Boroughs.

2.3 Status of Document

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 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.

3. Site Background

3.1 Brewing production on the Guinness Brewery site in Park Royal ceased at the end of June 2005 and clearance of the site has commenced. The Council needs to consider the future use of this key 10 Ha (25 acre) 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 a significant opportunity site has in the regeneration of Park Royal. 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; this needs to be done in a manner that looks at the entire area.

3.2 The site is located on Park Royal, London largest industrial and Business Park. Approximately 40% of the Park Royal estate is within Brent, 50% in Ealing and 10% in Hammersmith and Fulham. The site under consideration is designated as being located within a Strategic Employment Areas by the Brent Unitary Development Plan (UDP) 2004, and within a Strategic Employment Location by the London Plan (2004) as confirmed in the draft Sub Regional Development Framework (July 2005) and is also subject to a Major Opportunity Site designation; PR5 – *Park Royal Western Gateway Opportunity Site* in the Brent UDP 2004 and is identified as within an Opportunity Area in the London Plan (2004); 5D.2 *Opportunity Areas in West London*. Additionally, Park Royal Partnership (including LB Brent representation) has produced a 10 year Regeneration Strategy it sets out the local regeneration strategy context, and particularly outlines the importance of quality development at gateway locations such as the Park Royal western gateway.

3.3 This SPD needs to be prepared as a guide for potential applicants as to the Local Planning Authority's expectations and requirements for redevelopment of the Guinness Brewery site. Preparation of the brief follows discussions with key stakeholders. The purpose of this Supplementary Planning Document is to:

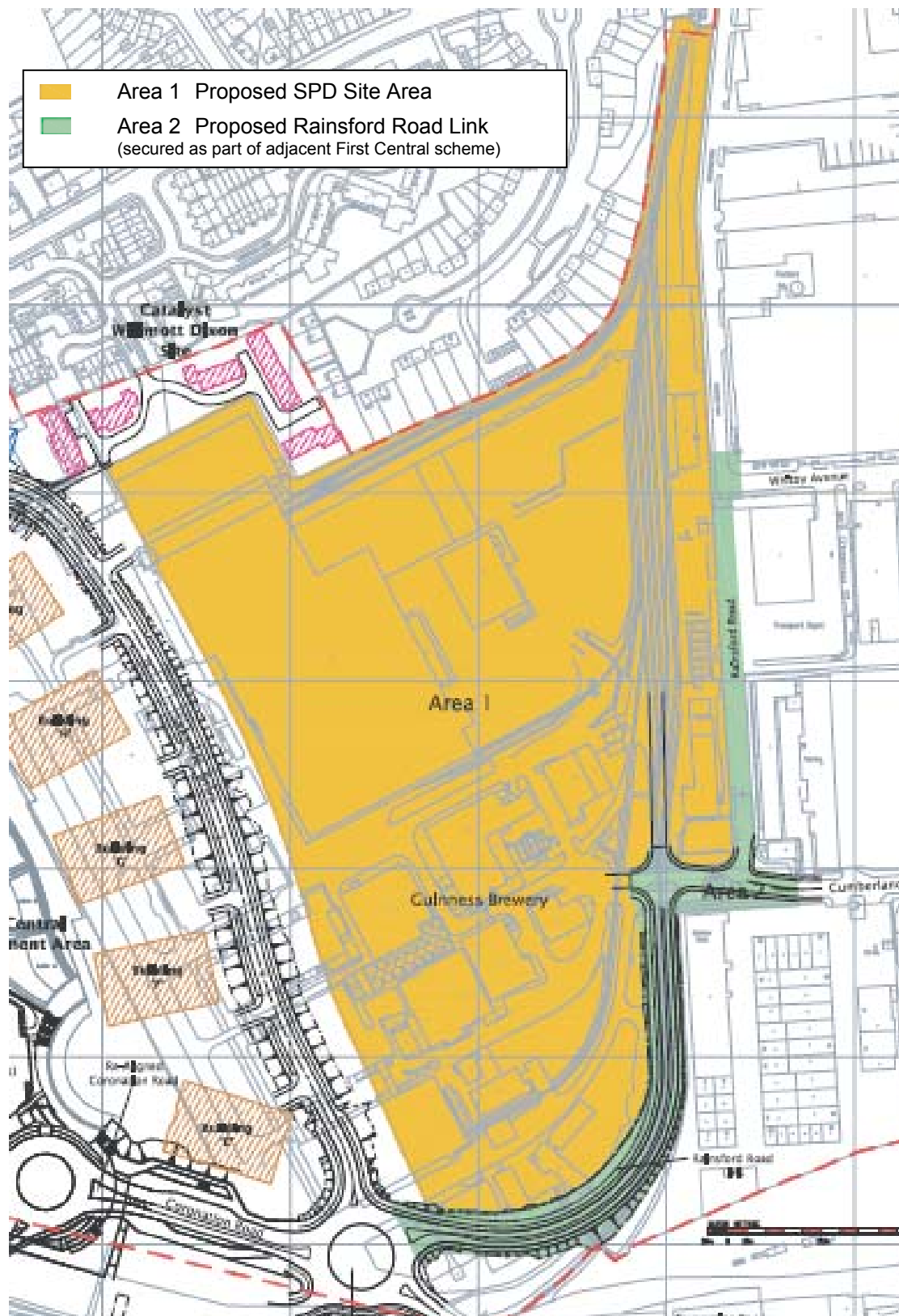
- identify the most appropriate uses for the site and maximise its potential benefits;
- promote the redevelopment of Guinness Brewery;
- provide guidance on appropriate land use;
- provide greater certainty on the form and quality of development required;
- ensure comprehensive and integrated development of the area;
- co-ordinate and promote development of the sites fundamental to the regeneration of the wider area;
- assist the local planning authority in the consideration and determination of future planning applications in the area; and
- provide sustainability guidelines for the development particularly with respect to energy use and generation.

3.4 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.

3.5 This SPD sets out the Council's and community's requirements for the redevelopment of Guinness Brewery and will be a material consideration in determining planning applications for this site. It has been developed taking into account the provisions of the London Plan 2004 and Brent's Unitary Development Plan (UDP) 2004. The SPD, in particular, provides the detail to support the implementation of policy PR5 *Park Royal Western gateway Opportunity Site* in the UDP and London Plan Policies 2A.2 *Opportunity Areas* and 5D.2 *Opportunity Areas in West London*.

3.6 The boundary of the area covered by the Guinness Brewery SPD is illustrated in Figure 2.

Figure 2 - Proposed SPD Site



4. SPD Objectives

4.1 The SPD objectives have been worked up to articulate a vision which maximises the opportunities presented by the site. These objectives have in turn been considered against the current UDP policy. The majority of the objectives confirm the validity of the policies overall. They do however point to a type of re-development that would not be wholly in accordance with current UDP and London Plan land use allocations but could go some way to realise London Plan aspirations for the area. These objectives have been drawn up following consideration of the initial evidence base as part of the Sustainability Appraisal (SA) and are built upon the policy framework set out by;

- UDP Policies;
 - PR5 *Park Royal Western Gateway Opportunity Site*;
 - EMP8 *Protection of Strategic and Borough Employment Areas*; and
 - EMP15 *Location of B1 Business Development*; as well as
- London Plan Policies;
 - 2A.2 *Opportunity Areas*;
 - 2A.4 *Areas for Regeneration*;
 - 3B.5 *Strategic Employment Locations*;
 - 4A.7-9 *Energy efficiency and renewable energy*; and
 - 5D.2 *Opportunity Areas in West London*.

They have been further developed as a result of the SPD options appraisal; specifically a commitment to focus on the creation of a sustainable and inclusive environment.

4.2 The refined SPD objectives are as follows;

I. Sustainable Development

Any development needs to be of high quality and provide an exemplar in terms of sustainability; providing an appropriate balance of social, economic and environmental benefits, built form and operation.

II. Development meets the role as a Strategic Employment Location

Any development has to meet the employment uses set out in the UDP and London Plan - this includes a wide range of employment uses but would not include employment in retail or leisure uses, other than in support of acceptable employment functions.

III. Provide a significant increase in employment

Current employment densities on the brewery site are relatively low. The site provides an opportunity to substantially increase numbers employed on site to meet the Council's Regeneration Strategy (as expressed in Brent's Regeneration Action Plan 2004-6 notably strategic priorities two and three) and the Park Royal Partnership's 10 Year Regeneration Strategy (seeking an increase of 25,000 jobs in the Park Royal area in the next 10 years). Opportunities to achieve particularly high employment densities on appropriate locations across the site should be exploited.

IV. Provide jobs / training to meet local employment needs

Measures need to be provided to ensure that local people have the best opportunity to access jobs and training both in the construction phases and with the final occupiers through Brent in2work and other schemes. Note also Park Royal Partnership's objective to increase by 50% the proportion of people working in Park Royal that live locally.

V. Add to the regeneration of Park Royal

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. As there is a lack of trees and greenery in Park Royal this redevelopment will require a particular focus on landscape quality. 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.

VI. Minimise energy demand and include on-site renewable energy sources

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 energy into new developments: Toolkit for planners, developers and consultants*' for London Renewables, on behalf of the Greater London Authority (GLA).

VII. Secure Comprehensive and Integrated Redevelopment

This offers the best chance to secure some key regenerative development. The marketing of the site as a coherent land parcel would lead to a masterplanning approach for comprehensive re-development. This would have particular benefits in terms of securing the most appropriate densities across the site as well as optimising movement arrangements.

VIII. Complement current development proposals

Development on the brewery site should not detract from the establishment of the First Central development either by unsympathetic uses or low quality development and environment. Development should not produce traffic impacts that compromise the successful completion of the First Central Business Park. Development that enhances the business park would be welcomed.

IX. Act as a Catalyst for the Realisation of First Central

The redevelopment of this site provides an excellent opportunity to increase the attractiveness and therefore aid the realisation of the First Central scheme in totality.

X. Utilising Public Transport

Development on the brewery site should concentrate on utilising the forthcoming public transport infrastructure, notably the underground station interchange. It should also support and make provision for enhanced bus services from the business park.

XI. Road Access / Transport Impact

Brent Transportation Service will consider proposals that change road access into the site & internal circulation, including links with the business park, placing particular emphasis on penetration by bus services.

XII. Maintain Quality of Life for Park Royal residents

Any development should maintain the quality of the residential environment for those living in the area, particularly adjoining the brewery in LB Ealing and under construction in Brent.

XIII. The Following Uses are Not Acceptable on this Site

- 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;
- 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;
- Housing – however, some provision directly related to uses 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.

5. Sustainability Appraisal

5.1 Role of Sustainability Appraisal

The purpose of Sustainability Appraisal (SA) is to promote sustainable development through better integration of sustainability considerations into the preparation and adoption of plans. The objective of this SA is to inform the development of the Guinness Site SPD. The SA has considered the SPD's implications, from a social, economic and environmental perspective, by assessing options and the draft SPD against available baseline data and sustainability objectives.

5.2 Options compared as part of the Sustainability Appraisal

One of the key requirements of SA is to consider reasonable alternatives as part of the assessment process. A range of options were selected that could be capable of realising the aspirations set out in the SPD aim and objectives, but were also;

- Capable of a high employment yield;
- Could maximise opportunities presented by the location in relation to public transport;
- Would be compatible with adjacent uses; and
- Yet were not uses which would be more appropriately directed to a town centre.

5.3 The six main strategic options considered were:

- A) Hospital led
- B) Education led
- C) Hospital & Education mix led
- D) Storage or Distribution (B8)
- E) General Industrial (B2)
- F) Mix of all B uses

5.4 Options Appraisal Results

In summary, options A (Hospital Led Redevelopment), B (Education Led Redevelopment) and C (Hospital and Education Led Redevelopment) performed similarly well against social and economic objectives, with option C scoring marginally better against social objectives. The performance of options A and C against environmental objectives was significantly negative, somewhat contrasting with option B which performed only moderately negatively.

5.5 Option D performed fairly positively against economic objectives but scored poorly against social and environmental objectives. For this reason Option D is considered to be the least favourable option.

5.6 Options E and F performed negatively against environmental objectives, although not as severely as for options A and C. Despite performing similarly well against economic objectives, Options E and F overall did not sufficiently demonstrate the capacity to prompt an equivalent suite of social benefits expected to come with either options A, B or C. For this reason options E and F should be ranked below A, B and C.

5.7 The results of the SA process do not indicate a statistically significant difference between options A, B and C as each fair, at least, equally if their negative performance against environmental objectives was sufficiently mitigated against and improved. Options E and F would be ranked next with option D in the final place.

5.8 The overall conclusion is that a mix of traditional employment uses developed alongside hospital / education uses located in the most accessible area of the site would appear to achieve the best score in relation to social, environmental and economic objectives. Options A, B and C are led by hospital / education uses but these are not the dominant uses; any scheme would need to comprise a significant element of traditional employment uses.

5.9 Implications of findings

SPDs in the form of site briefs will not always have a single 'preferred' option. They can often instead explore a number of equally viable variations based upon an agreed set of principles to allow for market forces to function freely and increase the likelihood of implementation. As the results of the SA appraisal cannot clearly distinguish between options A, B & C, the draft SPD will

explore the implementation possibilities of all three focusing on the advancement of an agreed set of development principles reflecting the specific developmental requirements identified during the options appraisal. Furthermore, as options A, B and C all incorporate B2 (General Industry) and B8 (Storage or Distribution) uses, delivery of these uses will also be explored within the SPD. Indeed, whilst the SA has demonstrated preference for options A, B and C; options D, E and F are not so significantly bad that they should be excluded from consideration; especially in parallel with conditions and mitigation measures.

5.10 The SA has identified land uses that do not fully accord with current UDP policy but subject to scale and degree may fit within the strategic planning policy framework. If this SPD is approved this will clearly identify an issue that is likely to be addressed through Brent's Local Development Framework (LDF), but is broadly consistent with the objectives set out in the London Plan. Therefore the options available include amending the policy through the LDF process by way of recommending policy changes as an option for consultation and consideration. Furthermore, the less favourable options are those which are most consistent with current policy and therefore should not be necessarily excluded on those grounds alone.

5.11 This SPD will therefore, fully explore the uses which comfortably sit within existing UDP policy but also provide generic guidance, to guide any possible non UDP conforming uses which may come forward to ensure that they can be properly considered, impacts minimised and mitigated against and relative benefits maximised.

5.12 The developmental requirements identified during the options appraisal include the following commitments which are reinforced throughout the SPD;

- local bus services, especially between this site and the surrounding area should be secured / improved, including the newly proposed Wembley to Park Royal transit;
- improve access to healthcare facilities for any residents;
- where any housing development is proposed - ensure the development provides a mix of housing including affordable housing;
- where any housing development is proposed - ensure that any new development would be fully accessible to disabled persons and will be of lifetime homes standards;
- incorporate the provision of 'community' space in any new development;
- ensure the development addresses issues relating to the fear of crime by being developed to 'secure by design' standards;
- ensure that an assessment of the archaeological potential of the site is conducted and findings given due regard;
- ensure any new residential or commercial building space was built to an "excellent" rating in accordance with SPG 19, BREEAM and Ecohomes standards;
- 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;
- ensure that the UDP parking standards are applied as maxima with any new development;
- 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;
- 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;
- incorporate a high level of noise attenuation;
- seek adherence to a demolition protocol;
- seek the retention of existing trees;
- place most trip generation intensive use nearest to transport interchange;
- improve the ecological diversity of the site through landscape design, with particular regard to native species and incorporate some green space for the benefit of the wider public area;
- provide convenient communal waste management facilities (for residential and commercial users) within the redeveloped area;
- contribute to the *10,000 Trees in Park Royal* project;

- seek to integrate waste management facilities that would allow energy to be recovered from non-recyclable waste;
- provide new / improved employment and training opportunities; particularly for 'local' people;
- ensure that following an investigation to establish potentially contaminated areas on this site any contaminated land is cleaned up;
- improve the building design of Park Royal through the introduction of high quality exemplars given that the adjacent buildings some architectural significance are to be demolished; and
- improve the landscape quality of Park Royal through the inclusion of a landscape structure within the Masterplan and the landscaping of individuals sites.

5.13 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 considerations will play an increasingly important role in location choice for new developments.

6. Current Policy Context

6.1 National Guidance and Policy

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 *Creating Sustainable Communities*, PPG4 *Industrial and Commercial Development and Small Firms*, PPG10 *Planning and Waste Management*, PPS12 *Local development Frameworks*, PPG13 *Transport*, PPS23 *Planning and Pollution Control*, PPG24 *Planning and Noise*, PPS9 *Biodiversity and Geological Conservation* and PPG25 *Development and Flood Risk*.

6.2 Development Plan Policies

Following commencement of part III of the Planning and Compulsory Purchase Act 2004 (the Act) the London Plan (2004) is now part of the Development plan for Brent. This means that applications for development within Brent must accord not only with UDP policy, but also with the policies contained within the London Plan. Where a conflict between the two plans exists, the London Plan has seniority due to it being the most recently adopted plan in accordance with the provisions of the Act.

6.3 The principal policies relevant to the SPD site are policy 5D.2 *Opportunity Areas in West London* of the London Plan and PR5 *Park Royal Western Gateway Opportunity Site* of the UDP.

6.4 Policy 5D.2 *Opportunity Areas in West London* identifies the SPD area as an area capable of accommodating substantial new jobs, and where potential should be maximised; as a major brownfield site with capacity for new development and potential for significant increases in density, where development can be geared to the use of public transport and public transport improvements to support development secured. The policy is set out in the text box below followed by the supporting table identifying the indicative estimates of growth.

Policy 5D.2 Opportunity Areas in West London

The West London Opportunity Areas are shown in Table 5D.1, with indicative estimates for homes and jobs growth. The Mayor will work with partners to draw up planning frameworks for these areas. These should inform UDP reviews and broader regeneration and community strategies and initiatives. Taking account of other policies, developments will be expected to maximise residential and non-residential densities and to contain mixed uses (see Chapter 3, Part B and Chapter 4, Part B). Given their scale, they are also likely to give rise to substantial planning obligations (see Policies 6A.4 and 6A.5). The general policy directions to be followed in the planning frameworks are indicated below.

table 5D.1 Opportunity Areas in West London – indicative estimates of growth

Opportunity Areas	Area (ha)	New jobs to 2016	New homes to 2016
Wembley	238	5,000	400
White City	30	11,000	1,200
Park Royal	470	10,000	-
Heathrow/Feltham/Bedfont Lakes/ Hounslow Town Centre	91	5,500	930
Hayes/West Drayton/Southall/ Stockley Business Park	371	35,000	5,800

source GLA 2003

6.5 The Brent Unitary Development Plan (UDP) was adopted in January 2004 and will remain as part of the statutory development plan until new development plan documents (DPDs) within the Local Development Framework (LDF) are adopted. The Act provides transitional arrangements to move to the new LDF system. Under these arrangements, as identified in Brent's Local Development Scheme (LDS), policies in the UDP are 'saved' for three years from

commencement of the Act (September 2004). The Council will seek to 'save' some policies beyond this period and the LDS identifies the Park Royal chapter as being one such area. Revised site allocations will however be brought forward in the first wave of DPDs.

6.6 Policy PR5 *Park Royal Western Gateway Opportunity Site* identifies the SPD site and the adjacent land upon which the First Central business park is being built out. The site is identified as a major development site and regeneration opportunity to be predominantly served by the public transport interchange.

PR5 PARK ROYAL WESTERN GATEWAY OPPORTUNITY SITE

Major development, including a business park, is promoted. This should incorporate a new Park Royal Interchange Station on the Central Line with a link to the Piccadilly Line.

Partial loss of open space within the site, will be permitted if it is essential to achieve the above, including the incorporation of the new station and other significant improvements to public transport facilities and services in the area. A minimum 2ha of additional public open space should be provided, together with compensatory provision for the loss of playing fields. This public open space shall form a link between the areas of Metropolitan Open Land designated in Ealing (Jellicoe Mounds and Twyford Abbey).

Development is subject to the following:

(a) Purpose built offices and / or hotels are located outside the Strategic Employment Area part of the site and adjoining the proposed Park Royal Interchange Station;

(b) Loss of locally listed buildings in the area will be considered against policy BE23 and the regeneration benefits of proposed replacement development. In particular, any proposed replacement buildings should be of equal or greater quality and unity;

(c) Any application shall be accompanied by an urban design framework, showing how different phases will be developed and the relationship between built and landscaped areas;

(d) Major development is subject to the construction of the Western Gateway Link Road, and "Concord Link" (within the London Borough of Ealing), and shall include a link road from Coronation Road to Rainsford Road (whilst retaining the railway sidings) and there should be traffic restrictions on Twyford Abbey Road and Coronation Road. It should include sufficient improvements to the trunk road network to enable the development to be accessed safely without unacceptably causing congestion (see also policy TRN16). The development overall will be subject to a satisfactory Transport Impact Assessment (see policy TRN1).

6.7 There area a range of other policies contained within the development plan which will guide the re-development of the SPD site. An indicative checklist is included at appendix 1 *Policy Checklist*. The remainder of this SPD will outline how a number of these policies are to be applied to the SPD site.

6.8 Other Planning Guidance

The Council has prepared a range of supplementary planning guidance, documents and briefs. A full current list is available on the Council web site at www.brent.gov.uk/planning.nsf The documents of particular relevance to the re-development of the SPD site are;

- SPG19 *Sustainable Design, Construction & Pollution Control*;
- SPG4 *Design Statements*;
- SPG18 *Employment Development*;
- SPG13 *Layout Standards for Access Roads*; and
- SPG17 *Design Guide for New Development*.

Also the following items of Mayoral Guidance, supplementary to the London Plan are relevant;

- Accessible London SPG; and
- Draft Industrial Capacity SPG.

6.9 Additionally, as part of the development of Brent's LDF, a draft Statement of Community Involvement (SCI) has been produced. The statement sets out the Council's requirements for public involvement in the preparation and production of policy and also in the development of planning applications. The Council's SCI is due to reach examination during December 2005 after which a binding inspectors report will be issued and adoption will shortly follow. Developers should give due regard to its context and requirements.

7. Sustainable Development & Environmental Standards

7.1 Sustainable Development

The Re-development of the former Guinness Brewery must provide an exemplar in terms of sustainable development. This will be achieved through ensuring sustainable principles are fundamental to the design, construction and operation of the scheme proposed for the SPD site. The London Plan and Brent's UDP include a range of policies covering sustainability matters. A fundamental building block of this SPD is that set out in UDP policy BE12 *Sustainable Design Principles*.

- 7.2 This SPD promotes a range of sustainable development through;
- securing a mix of employment generating uses, intensified approach to re-development;
 - seeking to secure the best use of a redundant land parcel;
 - maximising opportunities on a site adjacent to a significant transport interchange;
 - securing an exemplar in terms of sustainable design, construction and operation;
 - embracing a design-led approach to maximise the sites opportunities; and
 - providing significant job opportunities adjacent to a dense residential area.
- 7.3 To assist in the delivery of these principles any development will be expected to;
- Accord with The London Plan and UDP policy and SPG 19 *Sustainable Design & Construction* in relation to these matters, and in particular;
 - ensure any new residential or commercial building space was built to an "excellent" rating in accordance with SPG 19, BREEAM and Ecohomes standards; and
 - place most trip generation intensive use nearest to transport interchange.

The Council will require;

- SPG19 Sustainability Checklist to be completed and for scheme to achieve an 'excellent' rating;
- A cumulative sustainability plan in the event of phased developments being proposed.

7.4 Environmental Standards

In order to secure an exemplar in terms of sustainable design, construction and operation as outlined in the development principles a range of environmental issues need to be considered and satisfactorily dealt with. Indeed, the protection and active management of Brent's environment is a vital component of achieving sustainable development. A range of environmental matters concerning land contamination, operational pollution, surface water drainage, waste, water conservation and energy efficiency need to be considered. In order for the Council to take full account of the wider environmental impacts that the scheme may have an Environmental Impact Assessment may be required in accordance with UDP policy EP1 *Environmental Impact Assessment*;

7.5 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 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 accordance with PPS23 *Planning and Pollution Control*.

7.6 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 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. The Council would encourage any proposals for a renewable energy scheme to consider its wider application for other parts of Park Royal.

7.7 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 owners have already embarked on a process of deconstruction and remediation with on site use of materials where possible.

7.8 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; recycling rainwater and 'greywater', irrigation and open space maintenance.

7.9 Noise Pollution and Vibration

The environmental impact resulting from cumulative background noise due to the introduction of new industry and commercial enterprise shall be addressed through enforcement conditions at the planning stage with reference to BS4142: rating industrial noise affecting mixed residential and industrial areas.

7.10 Air Quality

Planning Policy Statement on planning and pollution control (PPS23) states, in Annex 1G, that 'any air quality consideration that relates to land-use and its development is capable of being a material planning consideration'. PPS23 also states (S1.29) that more weight will generally need to be given to air quality considerations where a development would have a significant impact on air quality inside, or adjacent to, an Air Quality Management Area (AQMA), but that air quality considerations can also be important when existing levels of air pollution are not sufficient to justify AQMA designation'.

7.11 The circumstances where air quality may constitute a material consideration are:

- When a development is proposed within an area formally designated as an AQMA such that the development may lead to further deterioration of air quality, and/or may bring further relevant exposure into the AQMA.
- When a development is proposed in a location experiencing near-exceedences of an Air Quality Objective(s) (AQO) or Limit Value(s) (LV), which may lead to predicted AQO exceedences causing an AQMA to be required.
- When a development is proposed in an area where AQO exceedences are predicted, but for which the formal designation of an AQMA is not required, as there was no relevant exposure initially. The proposed development would have to meet the relevant exposure criteria.
- When a proposed development application conflicts with Air Quality Action Planning proposals, or causes aspects of an Action Plan to become unworkable.

7.12 Pre-application discussions and design briefs - The earlier environmental protection concerns are brought into the development management process, the less likelihood there is for conflict and contention. Pre-application discussions on this matter will be significant for this major development, as this is most likely to have an air quality impact. Air quality professionals will therefore be involved in such discussions. Masterplanners will have to have regard to the fact that in the light of Air Quality concerns the following will need particular consideration; the orientation of specific buildings, provision and design of footpaths and open space provision. Air Quality Assessments - Please see section 14 Planning Application Requirements in relation to Air Quality Assessments.

7.13 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. 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.

7.14 An effective way of managing this excessive water, as advocated by PPG25, is the application of Sustainable Urban Drainage Systems (SUDs). There are a number of particular benefits including; allowing rain water to drain naturally at source, eliminating surface ponding, reducing the risk of pollutants in the sewage system, reducing the risk of flooding in the sewage system and significantly reducing both peak flows and total volume of water reaching the drainage system or watercourses.

7.15 The Environment Agency advises that the SUDS approach to drainage incorporates a wide variety of techniques. As a result, there is no one correct drainage solution for a site, indeed, the Environment Agency advises that in most cases, a combination of techniques will be required. Firstly methods of prevention should be explored. This could include recycling rain water, resisting paving areas unnecessarily, ensuring the safe storage of potentially polluting substances and ensuring that methods for the safe disposal of potentially polluting substances are in place. Secondly, Permeable surfaces are to be utilised wherever possible and practicable. These could include the use of gravel areas and porous blocks for paving. Other methods include filter strips and swales and infiltration techniques. To this end a drainage impact assessment may be necessary to assist in the correct planning of the necessary and appropriate methods. In particular it is felt that this site is capable of utilising permeable surfaces, green roofs and rain water recycling to assist in this area.

7.16 Green Roofs

Green roofs have many benefits including; storm water management through retention, filtration and run-off delay, air pollution reduction through the absorption of pollutants and dust, energy conservation particularly through protection from sunlight and temperature fluctuations, bio-diversity and habitat preservation, the provision of aesthetic and / or amenity space, reduction of the urban heat island effect through temperature regulation and sound insulation. Dependant upon the final mix of uses this site may be capable of incorporating both intensive and extensive methods as outlined in section 8.5 *Landscaping*.

The Council will require;

- an EIA if deemed necessary (this is likely to be the case);
- an air quality assessment;
- applicants 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;
- applicants 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;
- any scheme to incorporate a high level of noise attenuation;
- the inclusion of SUDs including use of green roofs wherever practicable;
- adherence to the demolition protocol;
- applicants to establish if contamination is present from site investigations and ensure the necessary remedial measures are applied;
- water efficiency measures to be incorporated into any scheme, e.g. recycling rainwater and 'greywater' and water efficiency in irrigation and open space maintenance;
- the provision of convenient communal waste management facilities within the redeveloped area; and
- seek to integrate waste management facilities that would allow energy to be recovered from non-recyclable waste.

8. Realising the vision for the Site

8.1 Urban Form & Design Requirements

8.1.1 This section establishes a framework for the development of the former Guinness Brewery site. The key objectives are:

- To ensure comprehensive and integrated development of the site within the overall area;
- To guide development and to set out what is expected in relation to the overall design and layout of the site;
- To assist the local planning authority in the consideration and determination of future planning applications on the site.

8.1.2 Policy BE11 *Intensive and Mixed-Use Developments* is particularly relevant to this SPD site as the careful juxtaposition of uses will be crucial to the success of this mixed-use scheme to preserve the quality and amenity of individual users;

8.1.3 Scope

It is accepted that there are a number of equally viable options for the site however it is not the Council's intention to explore detailed design options at this stage.

8.1.4 A Development Framework approach will help to ensure a controlled response to urban design, yet allow for the flexibility in architectural response and detailing. A Masterplan for the site will be expected at the next stage, building upon the design components and ideas set out in the development framework into detailed 3-d proposals. The London Plan and SRDF (Sub Regional Development Framework) have identified the need for a Framework for the whole of the Park Royal estate, however this is unlikely to be forthcoming in the near future and therefore the planning for this site should continue so that its opportunities are not lost. Therefore, the masterplanning process will need to have regard to the wider implications of any redevelopment particularly across the rest of the Park Royal estate. Furthermore, the findings of an interim capacity and demand study commissioned by the LDA should be available at the end of 2005. The masterplan will need to reflect its key findings and recommendations.

8.1.5 The **Development Framework** is about high quality design and place-making. The framework establishes a vision for the site and sets out the key design principles which will underpin the comprehensive redevelopment of the area. The vision for the site is a statement of aspiration - It is founded upon Development Plan policies and themes to create an opportunity for balanced development – meeting requirements in accordance with its status as a Strategic Employment Area / Location, whilst providing for new range of uses and ensuring a sustainable approach to development.

8.1.6 The guidance in this section addresses a range of design issues, including development character, streets and spaces, building form, materials and landscape design. It is intended to guide, encourage and set standards for these elements and encourage innovative response.

8.1.7 A vision for the site

The former Guinness Brewery is a key site located to the south west corner of the Park Royal Industrial estate. There is significant opportunity, through redevelopment of the Brewery site, to provide long lasting wider improvement and regeneration for the area.

Figure 3 - SPD Site in Context – the Adjacent First Central and Housing Schemes

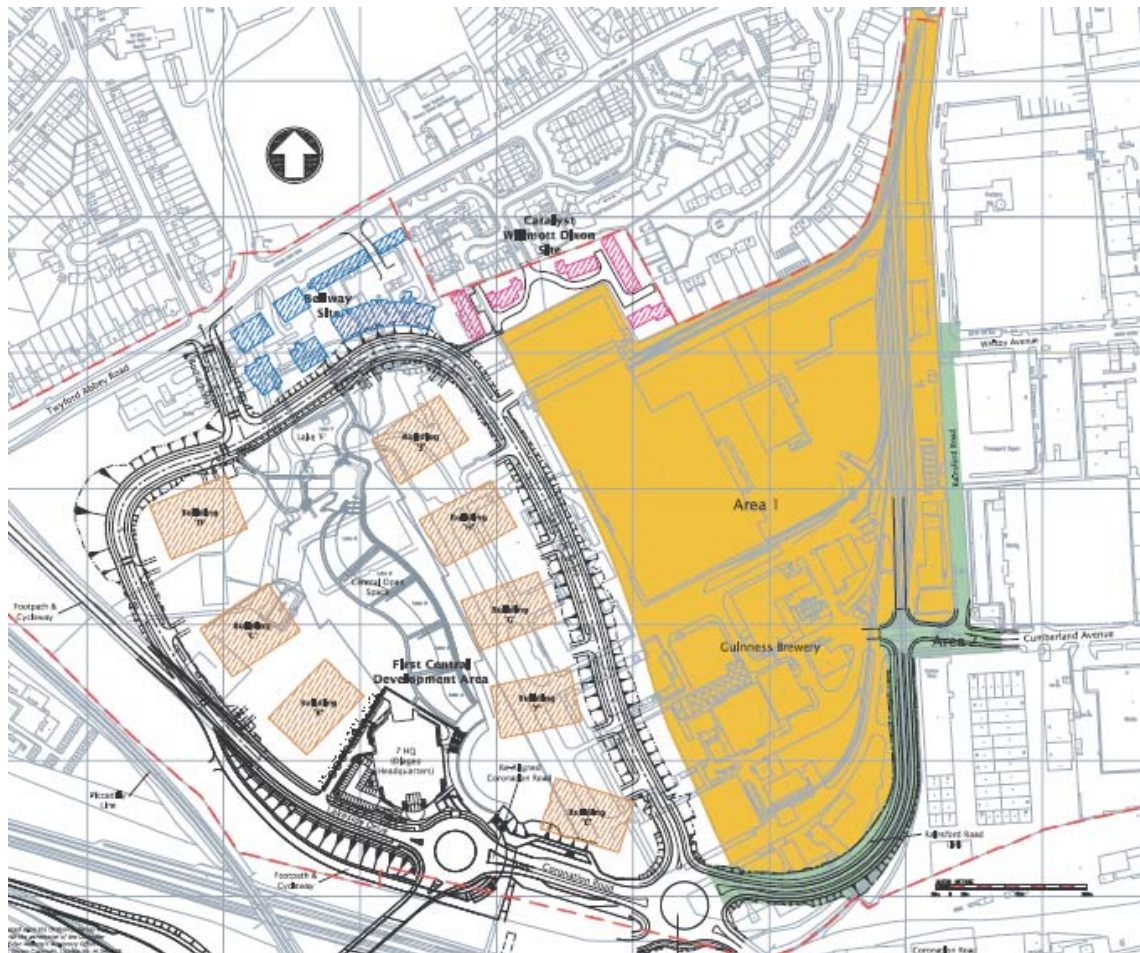
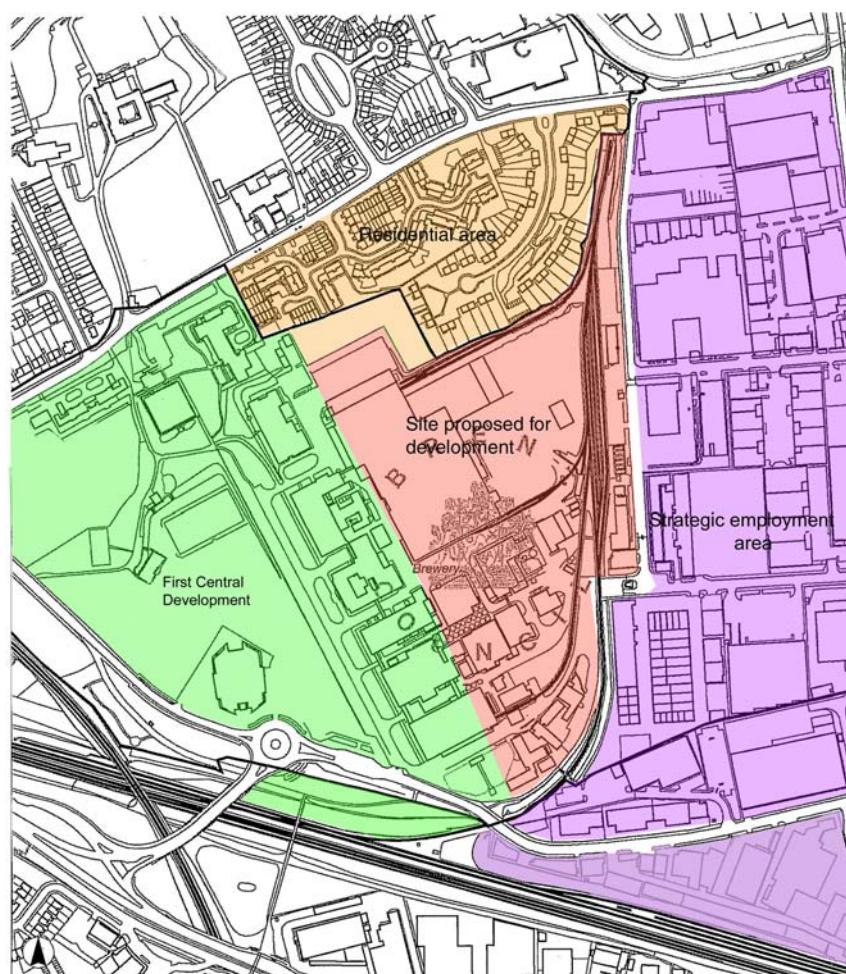


Figure 4 - SPD Site in Context – Surrounding Land Uses



Figure 5 - SPD Site in Context – Surrounding Land Use Zones



8.1.8 Any development of the site should be derived through the logical and principled application of the best and most up to date contemporary urban design practice. The development will be based on a site specific coherent set of guiding urban design principles: However there are a number of fundamental requirements for any development of the area, including:

- a strong link with and gateway into Park Royal Employment Area;
- a 'Recognisable new destination' with a significant range of high quality employment related accommodation within an attractive landscaped setting;
- development concentrated at a highly accessible public transport interchanges with well planned high quality transport links through the site;
- respect for context and setting and any residual neighbours both human and built although this does not rule out high quality contrast;
- provide a positive recognisable individual identity for the wider area; and
- a formal and accessible layout, that provides a robust but responsive context for contemporary architecture and its immediate related spaces.

8.1.9 It is envisaged that the site be developed as a new gateway to Park Royal, with its entrance marked at a high quality public transport interchange to the south of the site on Coronation Road. It will be defined by distinctive landmark buildings and spaces, designed to the highest quality and demonstrate the latest methods and technology sustainable design principles.

Buildings and spaces will connect within a wider network of streets and spaces and along core public transport routes.

8.1.10 Current use / land buildings

The site is located in the south-western portion of Park Royal Industrial Estate; a Council designated Strategic Employment Area. The whole site is located on reclaimed brownfield land.

Figure 6 – Current Buildings



8.1.11 The site is industrial in character and currently contains buildings formerly used by the Guinness Brewery when operational and storage / warehouse buildings. Whilst the SPD area contains some of the old brewery buildings they have been dealt with under the adjacent scheme for a business park and have immunity from listing. The SPD assumes that the site will be cleared with no outstanding issues regarding the retention of the existing brewery buildings. The areas which adjoin the development site are largely of an industrial / commercial nature. The area to the east of the site, known as First Central, has planning permission for the development of several new office buildings located on an existing landscaped area including several lakes in the centre. The Diageo Headquarters is currently located at the southern edge of the proposed development area fronting onto the roundabout on Coronation Road.

8.1.12 Industrial and warehousing dominate the area to the east of the site, residential to the north of the site and the road / railway line bounds the south of the site. 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 or allow those uses to continue functioning without any adverse impact. Mitigation should be to the new use(s) and not to existing uses.

8.1.13 The key site frontage is located along Rainsford Road. After completion of the First Central development, the frontage to Lakeside Drive will also provide a key frontage to the area.

8.1.14 Areas attributes and constraints

The site is currently well contained with limited access points into the site. The site however occupies a unique position, located in close proximity to major public transport facilities and transport infrastructure, such as Park Royal Underground on the Piccadilly line and for vehicles the Western Avenue. It also benefits from an attractive park setting of Diageo HQ. The sites potential therefore must be recognised thoroughly understood and realised. Development potential must be maximised in response to the overall vision, as a new gateway to Park Royal with high quality buildings and spaces.

Figure 7 – Adjacent First Central Scheme



8.1.15 Architectural Quality

The Council will require that all buildings demonstrate an exceptional quality in overall composition, detail and the accommodation that they provide - Proposals will not be accepted that excuse lack of quality through economic viability or contractual limitation. High quality design should be an integral part of a scheme and area development and should be built into all budgetary projections. Only building procurement routes that guarantee high quality building design should be adopted. The following implications of building design should be considered thoroughly before proposals are submitted to the Council;

8.1.16 Design Philosophy

Before any drawings are produced a clear rational design philosophy must be established from which a consistent design approach can be maintained. The design philosophy should derive from a recognisable sympathetic or challenging theme and remain consistent throughout the development of the design and the realisation of completed buildings.

8.1.17 Context

Building Design should not be dictated by fashion or a designers house style, the design philosophy should incorporate a rigorous consideration of the existing or proposed local context and either take the best from that context or propose such a radical innovative design that the context is reinforced by the challenging nature of the proposal.

8.1.18 Architectural Style

The Council has no preference for any particular architectural style or derivative, designers are encouraged within the strict parameters of high quality, to introduce innovative buildings that are stimulating and will add to the quality of life in Park Royal.

8.1.19 Functionality

All buildings should provide a high standard of accommodation within their private and public internal spaces. Particular uses should be appropriately provided for and accommodated to the highest architectural standards. The revision of residential accommodation must meet the requirements of the standards developed and discussed in the Masterplan.

8.1.20 Composition

Although the Council has no expectation or preference for a particular style, it will expect the composition and arrangement of buildings consider:

- i) An appropriate scale for the size and location of the site (including any published planning guidance)
- ii) Plan forms that, whilst making the most of the site potential, help to enable the development of challenging and interesting elevations.
- iii) An appropriate arrangement and distribution of massing through articulation in both the horizontal and vertical planes.
- iv) Efficient accessibility to building through legible appropriately scaled entrances.
- v) Innovative and coordinated fenestration to ensure appropriate levels of light for the uses proposed and their inhabitants.
- vi) Avoid proximities that cause problems of privacy and overlooking
- vii) A recognisable typology of construction detail that reaffirms and underpins the composition.

Policy BE9 (Architectural Quality) requires that new buildings, extensions and alterations to existing buildings, should embody a creative and appropriate design solution, specific to their site's shape, size, location and development opportunities.

8.1.21 Safety and Security

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 Secured by Design certification for the development, which is issued by the Association of Chief Police Officers. This approach should also be followed for non-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.

8.1.22 Materials

A good building design is often a function of the materials specified for the construction - The choice of materials is second only to the way in which their connections and junctions are detailed. The choice should be a fundamental consideration of the development of a design scheme. The Council requires that designers will provide materials boards at the time of application and will not expect that the choice can be commuted to a later date. However, these constraints do not automatically require the selection of traditional materials.

8.1.23 Construction Detail

All buildings to a greater or lesser extent are a function of their construction detail and it is this element that the Council considers to be as important as overall composition. The Council expects that designers will submit details drawings as part of their planning submissions to illustrate and promote the design quality of their building.

8.1.24 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. 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.

8.1.25 Design Presentation

Design quality can be difficult to communicate therefore; in any planning application the Council will require a combination of information to enable a thorough and fair assessment of a design. An application package should incorporate all or a combination of the following information:

- i) The usual combination of two-dimensional plans elevations and sections;
- ii) Three dimensional computer generated images with an appropriate expression of context;
- iii) If appropriate CGI animated presentations;
- iv) Material presentation boards arranged to show the proposed proximity and relationship of the various materials; and
- v) Physical scale models of the building to an appropriate level of detail. - The model should show context.

The Council will require;

- A comprehensive approach to the overall development of the site and improved links to the wider area;
- Development framework which illustrates the proposed urban form, including the street network and pattern, form and location of the new buildings, communal green space, the mix and distribution of uses (including the appropriate layering of those uses) and infrastructure requirements for each phase;
- 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;
- Provision of an urban design statement with any outline application demonstrating a

commitment to design quality;

- Where appropriate the creation of landmark buildings to create focal points, add architectural variety and legibility to the Western Gateway;
- Creation of a sense of place and identity through a variation in building types, styles and heights within each block, which is appropriate to the character of the specific location;
- Creation of active frontages with welcoming and legible entrances to buildings that coordinate with the immediate and wider landscape context;
- Variation in height and density with the greatest mass of people placed closest to the public transport node;
- A predominant building height of 4-6 storeys with landmark buildings of 8 or more storeys within appropriate areas;
- Sunlight, daylight, noise and vibration assessments as appropriate with any planning application; and
- High quality landmark quality architecture as described in Architectural Quality.

8.1.26 This section also includes a series of illustrative diagrams presented to give an indication of how the vision for the SPD site could be realised. They include;

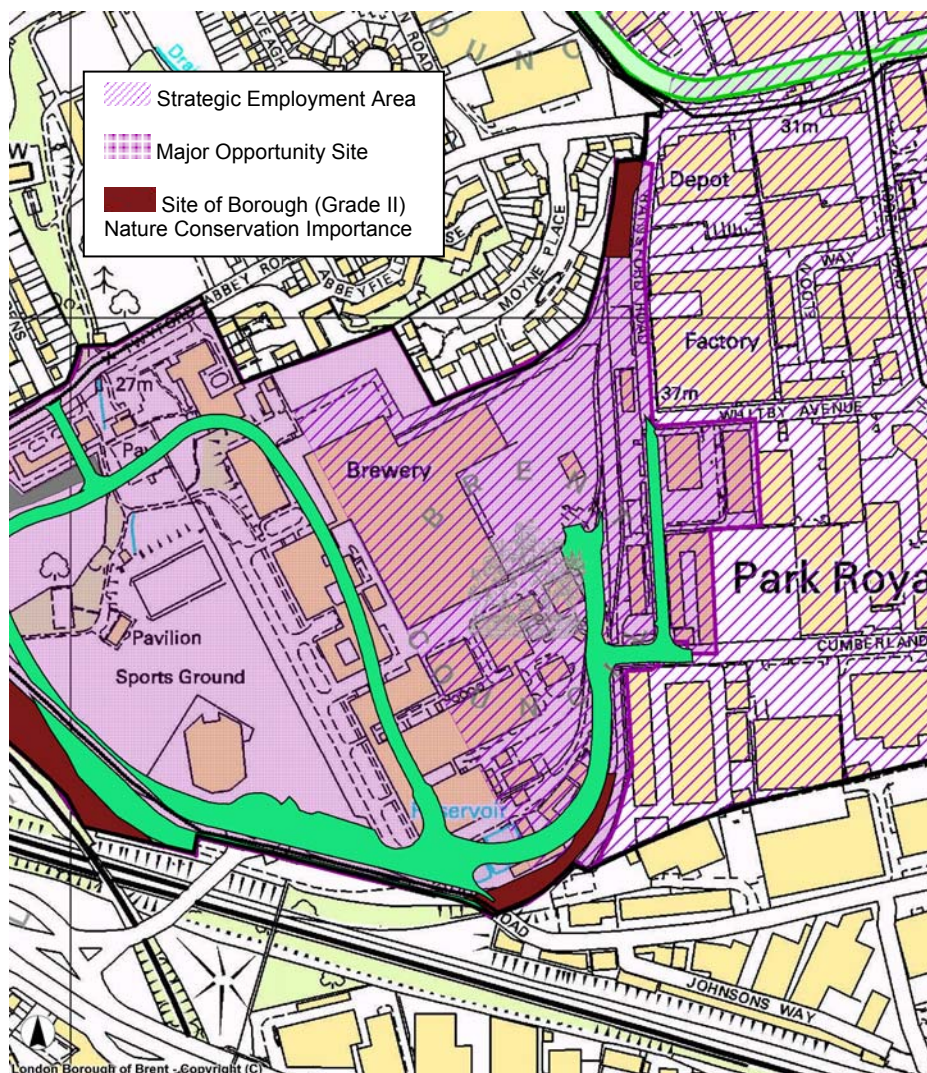
- Land use zoning;
- Building heights;
- Connectivity; and
- Landscaping.

8.2 Land Uses

8.2.2 UDP

Further to its designation under UDP policy PR5 *Park Royal Western Gateway Opportunity Site* the SPD site is also identified as a Strategic Employment Area (SEA) as illustrated below by an extract from the UDP Proposals Map;

Figure 8 – UDP Proposals Map Extract – SPD Site Designation



8.2.3 UDP Policy EMP8 *Protection of Strategic and Borough Employment Areas* effectively reserves land for industry, warehousing and related uses. The thrust of the policy rests on the idea that land should not be lost from 'employment' uses. 'Employment' uses in this context are B2 (General Industry), B8 (Storage or Distribution) and closely related Sui Generis uses.

8.2.4 Whilst the site is eminently suitable for a single use B2 or B8 scheme including closely related uses not falling within a use class (sui generis), the Council feels that this would be a lost opportunity to deliver a significant number and range of much needed jobs in line with the London Plan aspirations for the area particularly given its peripheral location within a Strategic Employment Area / Location, adjacent uses and proximity to a significant transport interchange.

8.2.5 The mixed use intensified redevelopment of this site, incorporating a significant element of traditional 'employment' uses whilst being in conflict with the ethos behind policy EMP8 will indeed, secure the introduction of a significant higher number of 'employment' jobs than the previous use delivered in addition to the range of other jobs created in accordance with Policy PR5.

8.2.6 In line with UDP policy this SPD seeks to retain the site in B2 / B8 use including closely related uses not falling within a use class (sui generis), but by developing the site more intensively in support of policy PR5 so that there could be a dual gain of industrial employment capacity and securing other employment in education and hospital uses.

8.2.7 The London Plan

The London Plan identifies Park Royal as a Strategic Employment Location (SEL). There are two types of sub-group in SELs;

- Industrial Business Park (IBP); and
- Preferred Industrial Locations (PIL).

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.

8.2.8 The Council would further suggest that due to this heavy or potentially polluting industrial uses are not generally considered to be appropriate in this location. In particular, the Council considers that this would not generally be considered to be a suitable location for environmental industries of recycling and reprocessing of waste for example. 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.

8.2.9 London Plan Policy 3B.5 *Strategic Employment Locations* states that the varied industrial offer of SELs should be promoted and managed and the supporting memorandum states that 'Surplus employment land should help meet strategic and local requirements for other uses...'. Policy 5D.2 *Opportunity Areas in West London* states that 'Taking account of other policies, developments will be expected to maximise residential and non-residential densities and to contain mixed uses...' and specifies that no new homes are proposed whilst the indicative estimate of growth cites 10,000 new jobs to 2016.

8.2.10 It is clear that in order to achieve this target it will be necessary to take opportunities presented by sites such as Guinness. It is exactly in these areas, with good (and improving) public transport accessibility, that employment densities can be dramatically increased. Indeed, it is only in a different mix of employment uses that these job targets can be achieved. It is particularly unlikely that B2 and B8 developments including closely related uses not falling within a use class (sui generis), alone will deliver such growth and regeneration. This is key to the considerations set out in this SPD.

8.2.10 Draft Industrial Capacity SPG

Draft Industrial Capacity SPG Implementation Point 2 *Strategic Employment Locations Framework* allows for the introduction of non-business uses into SELs where brought about through a strategically coordinated process of mixed use intensification. The draft SPG states, at section 7 *Industrial Capacity and Mixed Use Development*, that;

- With careful design and branding backed by clear planning briefs and agreements, provision for these firms (those with lower external, environmental costs on potential neighbours) can offer greater scope for mixed and more intensive forms of development;
- Good public transport access is an essential pre-requisite for such intensification;
- Those with higher employment densities may get greater benefit from better public transport provision, which itself can only be viable in higher density areas;
- Most appropriate will be locations where such developments can be closely integrated with a wider mix of surrounding uses... there may be scope to redevelop and upgrade parts of some Preferred Industrial Locations in appropriate locations, e.g. on the periphery of PILs near stations...These could enable consolidation of more environmentally sensitive, existing PIL tenants while maintaining the integrity of a local business cluster;
- The design of industrially led, mixed, higher density re-development should also ensure that overall there is no net loss of industrial employment capacity within SELs and Locally Significant Industrial Sites;

- Re-development, intensification and selective support for higher density, mixed uses in these locations must not compromise their offer as the main strategic and local reservoirs of industrial capacity; and
- This SPG therefore supports the thrust of the London Plan policy in underscoring the prime purpose of SELs which is to ensure an adequate stock of industrial employment capacity. Mixed-use development should only be permitted where it will support this central policy objective and support the TLP's broader objective to encourage better use of land such as that which can be brought about by mixed use re-development.

8.2.11 Furthermore, SPG Implementation Point 5 states that in implementing The London Plan policy the Mayor will and the LDA, TfL, boroughs and other partners should;

- identify strategically recognised industrial sites or parts of sites which have good public transport accessibility, especially those within or on the edge of town centres, for industry led, higher density, mixed redevelopment. This re-development should not incur a significant net loss of industrial employment capacity or compromise the offer of wider areas as competitive industrial locations;
- establish robust and sensitive industrial relocation arrangements to support re-development where necessary; and
- where necessary improve provision of small scale, 'walk to' amenities and services including crèches, which serve the needs of people working within industrial areas.

Additionally the draft SPG provides a categorisation of how much industrial land should be lost to other uses. It places Brent within the intermediate category of 'Limited Transfer'.

8.2.12 Draft SRDF

The draft SRDF reiterates the projected job target given in support of London Plan Policy 5D.2 *Opportunity Areas in West London*. In relation to the Park Royal Opportunity Area it also states that it is particularly important that any planning framework for Park Royal also takes account of Draft Supplementary Planning Guidance on Industrial Capacity and further states that 'ways in which a broader mix of uses could complement and not compromise the distinct business offer of this Area' should be tested. The draft SRDF also repeats the draft SPG on Industrial Capacity categorisation of Brent as falling within the 'Limited Transfer' category.

8.2.13 Employment

Rather than see a loss of employment land this SPD seeks to secure a mixed use re-development of the site that would result in an intensification not only in terms of density through maximising the use of the site, but also in terms of job numbers whilst ensuring that a significant level of industrial employment capacity is achieved. This could be obtained through encouraging a range of uses as outlined below. 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. This document seeks to encourage the linkages between the districts identified to maximise opportunities for the cross feeding of opportunities.

- A) Hospital led
- B) Education led
- C) Hospital & Education mix led
- D) Storage or Distribution (B8)
- E) General Industrial (B2)
- F) Mix of all B uses

A) Hospital led

- Hospital uses to occupy approximately 1/3 of the total site area forging a relationship with health services
- 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 related skilled industrial investment and production

B) Education led

- 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 related skilled industrial investment and production
- 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.

C) Hospital & Education mix

- Hospital & education uses to occupy approximately 2/3 of the total site area forging a relationship with health services
- Again remaining 1/3 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 or creative industry users and should be led by related skilled industrial investment and production

D) Storage or Distribution (B8)

- Pure B8 uses to occupy the majority of the site
- Ancillary offices acceptable

E) General Industrial (B2)

- Pure B2 uses to occupy the majority of the site
- Ancillary offices acceptable
- Mix could incorporate food park or similar
- Mix could include closely related uses not falling within a use class (sui generis)

F) Mix of all B uses

- B1; Research and development, studios, laboratories, high tech, B2; General Industrial, B8; Storage or Distribution all acceptable across the site
- Employment village approach offering a complete mix of employment uses
- Mix could incorporate food park, bio-medical, media and film or similar uses
- Mix could include closely related uses not falling within a use class (sui generis)
- Other ancillary uses may be acceptable

8.2.14 Housing

Residential uses are not deemed to be acceptable across this site as a whole as this is contrary to UDP policy, and may conflict with the mix of uses proposed. There is however, scope for a limited number of units on the former lorry park to the North of this land parcel. The release of this pocket to residential will enable an appropriate segregation of uses to be achieved and allow for the introduction of extensive landscaped acoustic buffers to be formed where necessary. Any residential units will need to provide a mix in terms of type and tenure in accordance with UDP Policy H2 *Requirement for Affordable Housing* and H3 *Proportion of Affordable Housing Sought*. Regard will also need to be had to lifetime home principles and standards.

8.2.15 Other Uses

In accordance with UDP Policy EMP6 small scale (less than 200m² gross) leisure, eating and shopping facilities may be permissible where they are intended to primarily serve the needs of workers in the vicinity and would not attract significant levels of visitor traffic.

8.2.16 Criteria for the Release of Employment Land

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);

- illustrate that the employment capacity of the site is to be maintained;
- demonstrate that the impact of such a release on the current demand / supply balance of industrial uses in Park Royal will be acceptable;
- justification as to the exceptionality of this site making it eminently suitable for a mix of uses;
- an assessment of the effective demand for this site for industrial employment uses;

- illustrate that the previous floorspace and number of employees in industrial uses is to be at least maintained;
- demonstrate that the scheme will be developed in such a way so that the industrial employment uses can operate viably;
- illustrate that the mix of uses proposed would not place unreasonable restrictions on the industrial employment uses;
- provide evidence of the likely impact of a mixed use scheme of local land values and availability of land for industrial employment uses;
- illustrate potential benefits of mixed use scheme to Park Royal as a whole including potential services and facilities benefits; and
- 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.

8.2.17 Land Use Zoning

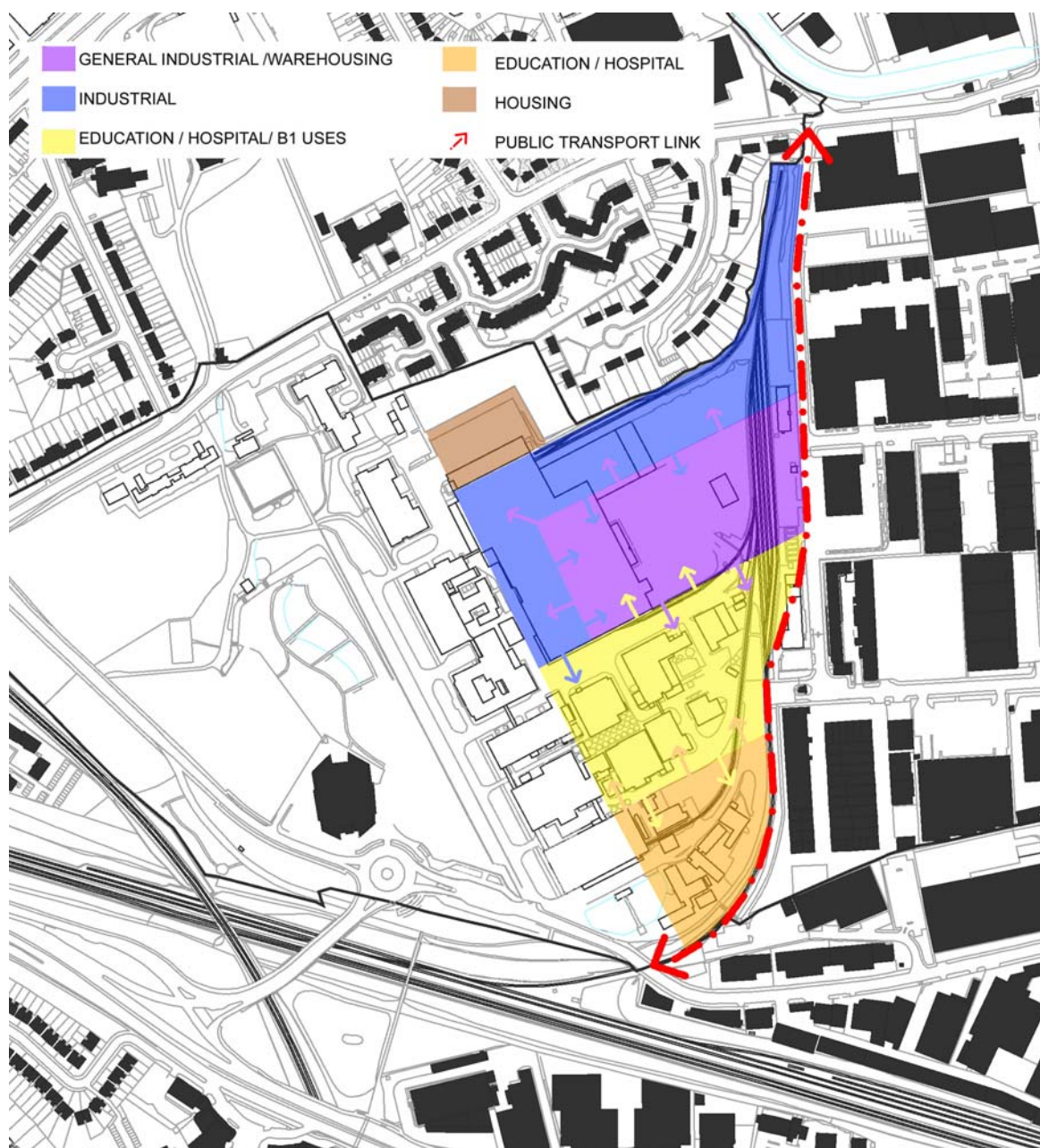
The location of proposed uses have been considered with regard to their relationship and impact on neighbouring sites and maximising development potential the relative benefits for of use compatibility. Use types and their location should be explored in the masterplanning stage, however a number of recognisable character areas or land use zones have been generated through the site analysis.

8.2.18 These character areas are not rigid, but intended to promote broad diversity throughout the scheme in response to basic design aspirations for the site and planning requirements in relation to specific uses.

8.2.19 The general pattern of character areas provides opportunity for detailed designs:

- To explore a broader range of urban forms and architecture across the site;
- To promote identity and legibility throughout the scheme by introducing more variety in built form;
- To establish focal points, variety and interest across the site.

Figure 9 – Indicative Redevelopment Land Use Opportunities



8.2.20 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 emphasise and build upon the synergies between the different uses proposed. Five land use zones have been identified for the SPD site. The area closest to the transport interchange has been identified as being suitable for the most employment dense uses capable of best realising this opportunity. The next zone back has been identified as a transition area suitable for a mixture of education / hospital / mix of industrial and warehousing uses. Behind this is a zone identified as being suitable for providing the bulk of the traditional employment uses; including general industry and warehousing. A strip behind this is reserved for light industry (B1b and B1c uses) to provide an appropriate segregation of uses and gradation towards the residential areas. Alternatively, general industry and warehousing uses may be suitable if they are well screened from the adjoining residential areas. A small pocket to the North-West of the SPD site has been identified for housing to provide a straight boundary to industrial uses Southwards which can better separate out residential and other uses across the site. A strip running from the

North-Eastern corner is to be preserved to enable the introduction of a new public transport link and the creation of landscaping.

The Council will require;

- development to accord with the uses identified; and
- an acceptable level of industrial employment capacity to be secured through adherence to proportions given in this section.

Additionally, the Council will resist;

- any housing other than on the single land parcel identified.

8.3 Building heights

Figure 10 - Indicative Building Heights



8.3.1 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. Development in the region of 8-10 storeys would be acceptable. Exceptionally, higher buildings may be achievable through the application of innovative contemporary architecture that not only reflects national but international standards of design.

8.3.2 Immediately to the North, Zone two will again be capable of taking dense developments. Building heights should be subservient to those on the most Southern zone. The design of the industrial zone should be managed in such a way to take maximum advantage of opportunities to increase density by working on multiple levels whilst suiting specific operational needs. The light industrial zone should act as a transition area, with particular regard to the relationship with the necessary landscaped acoustic barrier and the residential areas beyond.

8.3.3 The site 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.

8.4 Connectivity

8.4.1 Transportation Context

Much of the justification for the selection of uses promoted relies on the existing and proposed public transport infrastructure and placement within the road network. The site is currently accessed from Cumberland Avenue and Whitby Avenue / Rainsford Road to the east and Coronation Road to the south. Links to Twyford Abbey Road to the north are also available for buses, pedestrians and cyclists.

8.4.2 The Park Royal area as a whole is bounded by the North Circular Road to the northwest and the A40 to the south, which are both strategic routes of national and regional importance. A new Western Gateway link road was constructed as part of the First Central Office Development to provide direct access for eastbound traffic on the A40 to the southern end of the site. Improvements were also carried out to the Concord Zone junction on the A40, about 1km east of the new link road, to allow westbound traffic from the site to U-turn on the A40. This link road now therefore provides the main vehicular access route to and from the site onto the strategic road network.

8.4.3 Access from the North Circular Road can also be achieved via a grade-separated junction with Abbey Road (a local distributor road), which connects with Whitby Avenue, Cumberland Avenue and Coronation Road to the east of the site.

8.4.4 Bus services operate along the Coronation Road (226 & PR1), Whitby Avenue, Rainsford Road & Twyford Abbey Road (224) and the A40 (95 & 487) connecting the site to Ealing, Southall, Wembley, South Harrow, Shepherd's Bush, Harlesden, Willesden and Cricklewood. Further afield, route 440 along Abbey Road provides a link to Acton and Chiswick.

8.4.5 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, Stonebridge Park Underground (Bakerloo line), and suburban (Silverlink Metro) line station is approximately 1.2 km to the north of the site, and Harlesden Underground (Bakerloo line), and suburban (Silverlink Metro) line station is approximately 1.7 km to the north-east of the site.

8.4.6 The existing PTAL rating across the site ranges from 2 to 3 (moderate) between its northern end and its southern end.

8.4.7 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.

8.4.8 Public Transport Improvements

As part of the adjacent First Central Scheme, a new Park Royal station on the Central Line has been secured, with a fare-side link to the existing Piccadilly line station. Detailed planning consent has since been granted and detailed negotiations are underway with London Underground over the construction works.

8.4.9 Additionally, local bus services, especially between this site and the surrounding area should be secured / improved. In this regard, the First Central development is intended to secure the diversion of the 224 route along Coronation Road and Twyford Abbey Road (rather than Abbey Road) and the extension of the PR2 route to the new Park Royal station interchange, once sufficient office floorspace has been provided. In addition, any development should assist the delivery of the proposed 'Wembley-Park Royal Transit'.

8.4.10 A right of way via the Guinness site between Twyford Abbey Road and First Central may be necessary to secure the second phase of the Transit proposal, where a busway or ultimately tram link is envisaged. Alternatively, the scheme may require bus lanes to be provided along the Rainsford Road. 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 potentially required cannot be quantified at this stage.

8.4.11 Indeed, it is such a scheme that will enable the realisation of UDP policy TRN6 *Intensive Developments at Selected Transport Interchanges* which identifies the area covered by PR5 *Park Royal Western Gateway Opportunity Site* as being appropriate for high density development with a mix of uses (in tandem with policy BE11 *Intensive and Mixed-Use Developments*) as it becomes a focal point with good public transport accessibility.

8.4.12 The proposed provision of the new Central line Park Royal station and the extension/diversion of bus routes 224 and PR2 is sufficient to increase the PTAL rating at the very southern tip of the site to 4 (good). The further addition of a high-frequency Transit route could further increase the PTAL rating across much of the rest of the site to between 3 (moderate) at the northern end and 4 (good) at the southern end (as opposed to between 2 and 3 at present).

8.4.13 To reflect this, any development proposals attracting high numbers of visitors, such as education or health uses, should be sited towards the southern end of the site close to the future Park Royal public transport interchange.

8.4.14 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.

8.4.15 Access arrangements

In addition to the Western Gateway access from the A40, the First Central development is obliged to provide a new road link between Coronation Road, Cumberland Avenue and Rainsford Road, along the eastern edge of the Guinness Brewery site. An alignment for that road was agreed as part of the First Central planning permission, which kept close to the eastern boundary of the brewery site in order to preserve the integrity of the brewery operations.

8.4.16 With the brewery now closed and the subject of comprehensive redevelopment, there is no longer any reason to be bound by the approved alignment for this link road. The opportunity should therefore be taken to review the approved road alignment, in order to optimise its value to both the future development of this site and general access in the area.

8.4.17 In particular, the opportunity should be taken to redesign the approved staggered junction arrangement at the junction with Cumberland Avenue and provide a more uniform signalised or roundabout junction in this location.

8.4.18 The approved proposals also included a one-way system northbound between Cumberland Avenue and Rainsford Road, but with sufficient width shown to allow two-way working or a contraflow cycle lane if desired. Such an arrangement may not be suitable for access to this development and this development should also therefore review the traffic management arrangements for the northern end of the link road to ensure they are compatible with the development proposals.

8.4.19 In general, it is assumed that vehicular access, particularly for industrial/warehouse uses, will be confined to the eastern end of the site. All uses will benefit from pedestrian / cyclist access being taken from the future eastern length of the approved Lakeside Way perimeter road.

8.4.20 Otherwise, the site layout should aim to minimise the amount of road space required to service the development and ensure the design incorporates traffic calming measures to ensure traffic speeds within the development site are restrained.

8.4.21 UDP policy TRN14 *Highway Design* 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 *Urban Form and Design Requirements* 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. 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.

8.4.22 Off Site Highway Improvements

Initial Transport Advice has been prepared by consultants Mott MacDonald for a number of potential land uses on the site. As a general conclusion, any development that sought to keep traffic flows into and out of the site to the levels generated by the former use of the site as a brewery would severely limit the development potential of the site.

8.4.23 As such, it is accepted that the redevelopment of the site is likely to result in significant increases in peak hour traffic flows in the area. The extent of this and the impact it will be likely to have will need to be examined through a comprehensive Transport Assessment, which will also need to identify suitable mitigation measures to address any adverse impact. These are likely to include improvements to local roads and junctions, but also the implementation of Travel Plan initiatives to reduce car use and in particular, restraint in the level of car parking to be provided within the development.

8.4.24 Creation of a Network of Footpaths and Cycleways

The site layout will need to maximise permeability by pedestrians and cyclists, ensuring that any footpaths / cyclepaths provided are continuous, direct, safe and where possible segregated. In particular, high quality routes between key building entrance points within the development and public transport stops will be essential. The network created will need to link seamlessly with existing footways and surrounding cycle routes on Coronation Road, Twyford Abbey Road and Abbey Road. These pedestrian and cycle routes must connect to established and planned transport nodes and interchanges.

8.4.25 Parking

PS3 allows for an increase of up to $\frac{1}{3}$ in parking exceptionally for purposes of aiding regeneration. Park Royal is cited as one area to which this applies providing that it can be demonstrated that:

- (a) it is a key regeneration proposal supportive of regeneration projects in the area; and
- (b) the transport and environmental impact of the scheme is acceptable; and
- (c) the proposal secures significant and sufficient public transport / walking / cycling improvements, and / or contributions towards on-street parking controls, and implementation of a green transport plan.

PS6 applies to the employment uses promoted by this SPD; business (Use Class B1), general industry (Use Class B2) and warehousing (Use Class B8). It allows for a maximum of one space per 300 m² gross floor area in or adjacent to town or district centres where public transport access is good or very good. Elsewhere, such as in Park Royal, a standard of 1 space per 150 m² Gross Floor Area applies.

PS12 applies to some of the other potential uses, namely non-residential institutions (Use Class D1) and hospitals (Use Class C2). It allows 1 space per 5 beds for hospitals and 1 space per 5 workers for educational use. For all education and health uses, the maximum additional visitor / student parking should be 20% of the employee parking, with a minimum provision of one space.

PS15 requires that 5% of spaces (1 minimum) should be wide bays; marked and reserved for disabled people.

Additionally, UDP policy TRN31 *Design and Land Take of Car Parks* echoes the requirements set out in section 11 *Landscaping* and section 12 *Environmental Standards* in requiring careful consideration of their visual intrusion and management of water run-off.

8.4.26 Cycle Parking

PS16 requires the following;

- Other educational, universities, colleges etc. 1 space per 8 staff / students
- Business / Offices (B1a) 125 m² with a minimum of 2 spaces
- General Industry (B2), Light Industry / R&D (B1b, B1c) & Warehousing (B8) 500 m² with a minimum of 2 spaces

For workplaces over 2000m² secure lockers will be required, as will suitable changing/showering facilities for both sexes. Cycle parking should be provided in line with standards outlined in the LCN Design Manual.

8.4.27 Servicing Standards

PS19 Business (Use Class B1), General Industry (Use Class B2) and Warehousing (Use Class B8) servicing requirements;

- Units under 100m² Gross Floor Area will be required to provide a loading bay that can accommodate a 'transit' sized vehicle (6m x 3m).
- Units between 100m²-280m² Gross Floor Area must have loading bays that can accommodate at least an 8m rigid vehicle (8m x 3.5m).
- Where units less than 280m² are proposed the development as a whole must be capable of handling full-sized vehicles. This applies to unloading and turning in particular.
- Units 280m²-2000m² Gross Floor Area must have at least one full sized loading bay (16.5m x 3.5m).
- Units larger than 2000m² must have at least two full sized loading bays.
- B1(a) office units need only be served by 8m rigid vehicles, although such developments over 5000m² should have provision for the maximum sized rigid vehicles.
- All service bays for car repairs (B2) should provide one off-street parking space for vehicles awaiting repair / delivery.

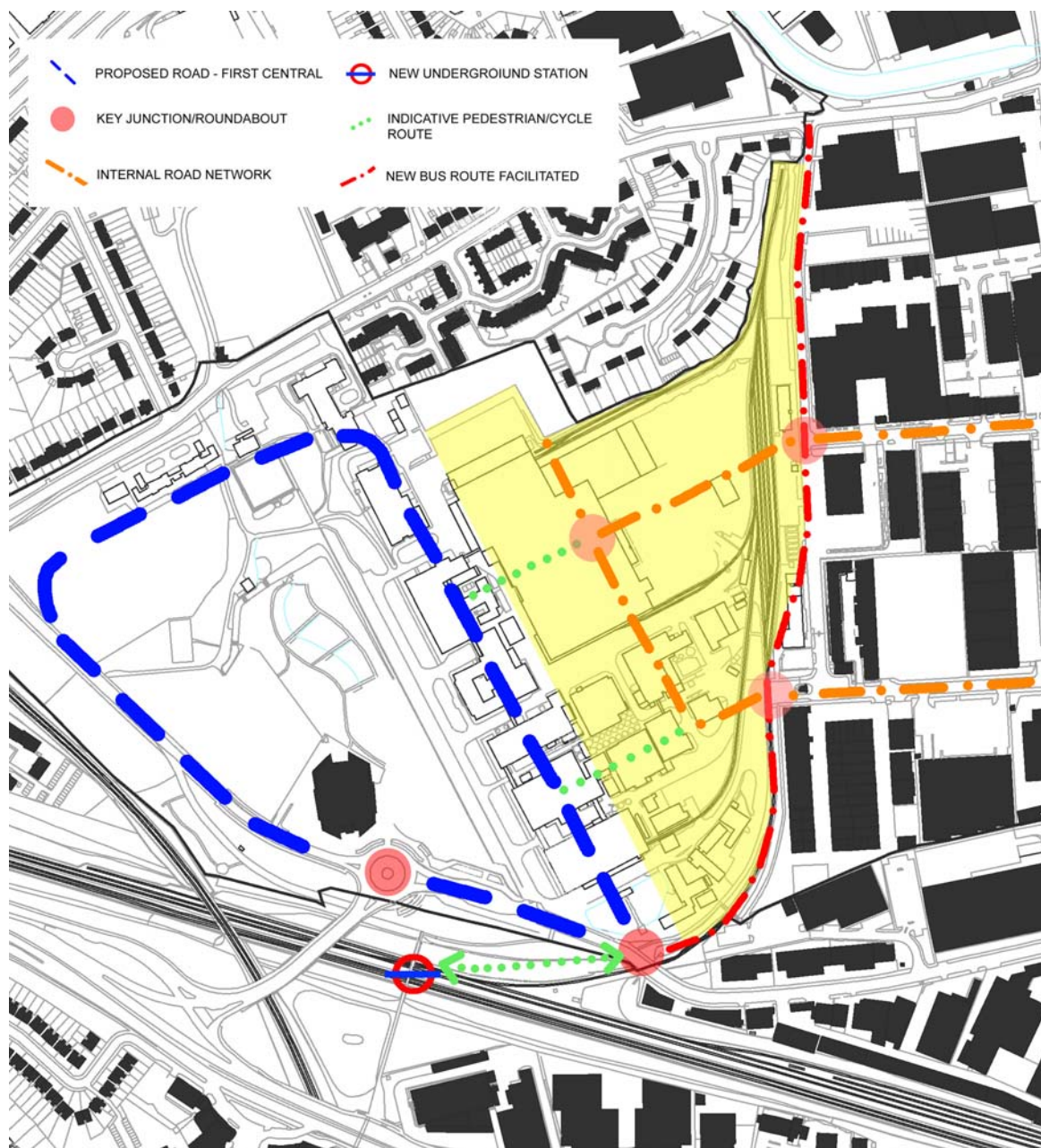
PS22 Hospitals (Use Class C2) servicing requirements;

- Hospital developments must provide facilities for at least 8m rigid vehicles.
- Suitable sized facilities should be provided for buses and / or ambulances catering for the client group.

The site is well located for ease of access by public transport and road. Future improvement plans and investment into public transport and transport infrastructure will also maximise benefits to the development of the site and the area.

8.4.28 With improved links to the site established, it is crucial that the internal layout of development maximises the opportunity for pedestrian, cycle and vehicle access and movement. Any transport proposals must therefore seek to maximise pedestrian and vehicular access into the site and integrate into the wider area where possible. The Council would like to see the establishment of an East – West connection for pedestrians and cyclists and possibly light vehicle use.

Figure 11 - Indicative Connectivity Arrangements



8.4.29 A Masterplan should be developed for the SPD site. This will need to include an access and movement strategy. In particular, an appropriate internal road network will need to be established to serve the varying needs of the uses promoted. Linkages to the tube station are to be maximised and the most convenient pedestrian route created. Wider public transport improvements are to be made; in particular, the establishment of a North-South bus route and requiring land to the North-East of the SPD site to facilitate the provision of the Wembley – Park Royal transit. The strategy must include;

- access statement enshrining inclusive design principles and factors;
- wider movement context (major roads / public transport);
- Key access points (pedestrian and vehicular);
- A North-South and East-West grid;
- Primary routes;
- Secondary routes;
- Local access routes;
- Green / open space links; and

- Public transport routes / corridors.

The Council will require;

A Transport Assessment to be carried out. This is to incorporate:

- Assessment of the traffic impact of the development proposals and identification of potential mitigating measures (incl. road/junction improvements);
- Study of potential access options, including a review of the alignment of the approved Rainsford Road link (to the South-East of the site);
- Traffic reduction measures to be incorporated in a Travel Plan;
- Adherence to the maximum parking standards (incl. a review of on-street parking restrictions on streets both within and around the development);
- Significant public transport improvements in the area (incl. land to assist in the delivery of the 'Wembley-Park Royal Transit');
- Improvements to pedestrian and cycle facilities in the area; and
- Depending on the level of increased traffic generated by the development, the Council may require traffic calming measures in and around the site.

8.5 Landscaping

8.5.1 General Requirements

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. A comprehensive approach should be taken to landscaping to allow the linking of activities. UDP policy BE6 *Public Realm: Landscape Design* sets out how the quality of the development can be enhanced.

8.5.2 A landscape strategy needs to be prepared prior to development to address landscape and wider environmental issues. Particular regard should be had to;

- retaining existing trees and ensuring their protection during demolition and construction;
- enhancing biodiversity by the planting of native species;
- entrances to the site as a whole and individual buildings;
- perimeters adjoining main roads;
- perimeters adjoining residential;
- perimeters adjoining other sensitive receptors; and
- significant contribution to the *10,000 Trees in Park Royal* project.

8.5.3 In support of the thread of sustainability running through the Brent UDP, the London Plan, supporting guidance and this SPD the following will be sought to offset the environmental impact of development;

- Extensive use of green roofs; and
- The amount of tree planting will be required in ratio to the number of car / lorry spaces as follows;
 - 4 car parking space = 1 tree
 - 1 lorry parking space = 2 trees

These trees will benefit the environment through assisting to combat the effects of air pollution, particulate pollution, and temperature variations. (This should not be viewed as the maximum tree provision required).

8.5.4 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.

8.5.5 Green Roofs

Green roofs have many benefits as outlined in the section 12 *Environmental Standards*. Dependant upon the final mix of uses this site may be capable of incorporating both intensive and extensive methods. Intensive green roofs, such as in the form of 'roof gardens'; which require maintenance and can be utilised as open space, may be best suited to the hospital or educational use. Extensive green roofs, which are mainly developed for aesthetic and ecological purposes and are largely self-sustaining, may be appropriate for the industrial uses. Maintenance plans for greens roofs should be submitted with the planning application.

8.5.6 Trees

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. These trees will help to enhance and define new development, rather than hinder it. 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.

8.5.7 Open Space

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. 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.

8.5.8 Buffers

As identified on indicative plan 4 *Landscaping* 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. 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. Additionally, existing buffers should be retained wherever feasible.

8.5.9 Landscape Frontage

Where the boundary of a site adjoins a highway or public place a landscaped edge must be provided as part of the overall landscaping and greening of the SPD area. In these locations a landscape strip of at least 3.0 metres is to be provided and planted with shrubs. Where buildings are set back from the boundary trees must be included, such trees are to be species having the maximum mature size that the spaces available can accommodate.

8.5.10 Specific Requirements

Hospital led considerations:

- Particular regard will need to be had to the relevant setting of this use;
- Secure garden-like spaces for patients and visitors will be necessary dependent upon the specific nature of any resultant hospital;
- Outside space for staff;
- Use of intensive green roofs;
- Potential relatively high vehicle use by visitors and staff will require a tree to car park space ratio of 1:4.

Education led considerations:

- Particular regard will need to be had to the relevant setting of this use;
- Use of intensive green roofs;
- Depending upon the specific nature of any resultant educational use, green spaces may be needed for games / sport; and
- Outside areas for eating / studying / socialising will be necessary.

Hospital / Education led considerations:

- Mix of the above

Storage or Distribution considerations:

- Small outside space for ancillary offices;
- Employee sitting out areas;
- Use of extensive green roofs; and
- High vehicle use: trees and car-park ratio.

General Industrial considerations:

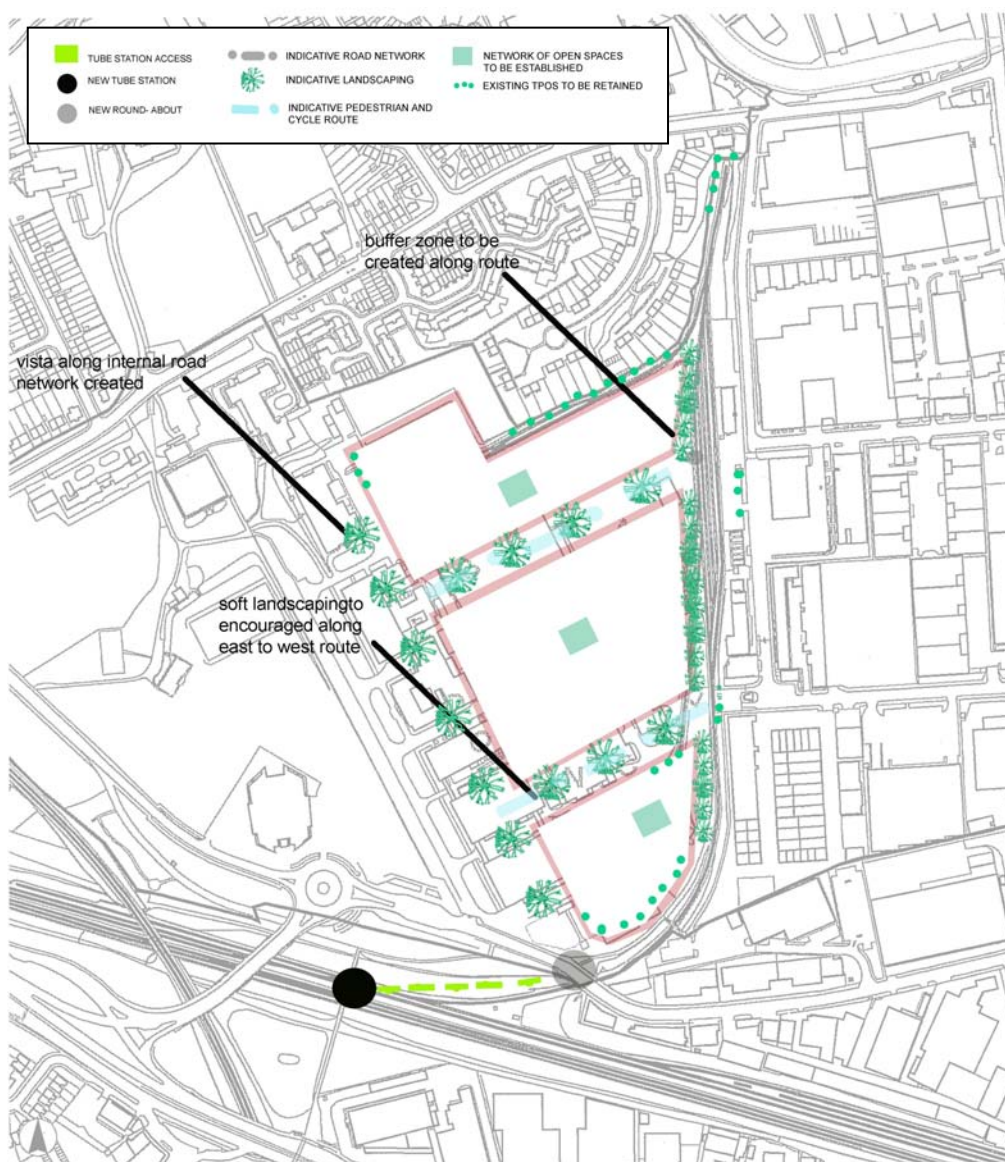
- Small outside space for ancillary offices;
- Employee sitting out areas;
- Spaces to be kept small and usable;

- Use of extensive green roofs; and
- High vehicle use: trees and car-park ratio.

8.5.11 It is important to facilitate major transport access and servicing for all uses, particularly the larger employment/industrial uses. It is also important that this function does not dominate the site. A Landscape and Streetscape Strategy should therefore be an important part of any masterplan, to ensure an integrated and balanced approach to the setting of the development, street design and movement function. This should include hard and soft landscaping proposals. The aspiration is to integrate pedestrian and vehicle routes and facilities together where possible to maximise natural surveillance and enhance street life and activity; this is integral to place making.

8.5.12 Landscaping / replacement trees / further landscape enhancement should be part of any proposal to bring environmental benefit in terms of reducing and controlling air pollution.

Figure 12 - Indicative Landscape Treatment



8.5.13 Existing TPO's have been broadly indicated; all existing trees are to be retained wherever possible. Exceptionally, where removal is essential, appropriate mitigation will be required. Additionally, buffers are to be developed adjacent to the residential areas and external roads. In particular, regard is to be had to the site's relationship with the bund to be created on the boundary

of the adjacent business park. A network of usable small open spaces is to be created; accessible to all areas.

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;
- 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.

9. Planning Obligations

9.1 In association with outline and full planning applications for the development of this site, the Council will seek to secure agreement by the owner / developer to meet a number of planning obligations in order to ensure that:

- the development objectives for the site are met;
- the adverse impacts of the proposed development are mitigated;
- the quality and sustainability of the development is maintained and enhanced;
- needs arising from the development are met;
- losses arising from the development are compensated for; and
- other policy requirements are met.

9.2 The ODPM Planning Obligations Circular 05/2005 encourages the Council to use formulae based standard charges , In line with this circular the Council will negotiate with the applicant , if so willing, to simplify this process by costing many of the items that will be required into a monetary figure then apply the cost , for example per square metre. (It is intended that more information on standard charges will be provided in a forthcoming SPD).

9.3 This would have the benefit of simplifying the cost and time taken to complete the Planning Obligations Agreement. These negotiations would only take place through applicant agreement, and will not include any provision of affordable housing which will be required on site in relation to any housing application.

9.4 The owner / developer will have a choice of agreeing to meet such standardised planning charges (as set out in the s106 SPD / Report) and / or to negotiating the appropriate planning obligations according to the scale of the development and uses proposed, as well as the outcomes of any impact assessments required.

9.5 Obligations will take the form of both financial contributions and direct provision. Financial contributions are in most cases triggered on making a material start to the development or timed to ensure the timely provision of necessary infrastructure.

9.6 In either case the applicant will be required to pay for the Council's legal and professional costs incurred including preparation and completion of the agreement and monitoring and / or enforcing compliance with the agreement.

9.7 Any legal agreement is likely to include the following types of obligations, consistent with the guidance contained in this document:

Transport

UDP Policies TRN1 *Transport Assessment*, TRN2 *Public Transport Integration*, TRN4 *Measures to make Transport Impact Acceptable*, TRN9 *Bus Priority*, TRN11 *The London Cycle Network*, TRN14 *Highway Design*, TRN22 *Parking Standards – Non-Residential Developments*, TRN24 *On-Street Parking* PR1 *Major Developments in Park Royal*, and PR2 *Transport Improvements in Park Royal*

9.8 Travel Plan

The Council will require that travel plans are drawn up for all non-residential uses and funding to monitor the plans over a 5 year period (including the Council's associated costs) is provided. The purpose of these plans is to manage the transport needs of staff and visitors to the development so as to minimise car usage and promote alternative modes of transport.

9.9 Highway Works

The provision of all new roads and works to the street network (roads, footpaths & cycle routes) must be designed and constructed to Council's adoptable standards.

9.10 Non-car access, parking control & highway safety improvements

The Council will seek to secure either through financial contributions or direct provision of:

- pedestrian and cycle improvements, including the provision of pedestrian routes including the Safer Route to Schools, cycle routes, facilities (?) and secure cycle parking.

- a City Car Club to serve any housing / commercial development and funding for the initial start up costs and marketing

9.11 Public Transport

The Council will seek a contribution towards the ongoing improvement of local bus services, especially between the site and the surrounding area.

Wembley – Park Royal Link

A right of way may be required via the Guinness site between Twyford Abbey Road and First Central to facilitate 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 may be 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 for a twin track busway or tram line cannot be quantified at this stage. The Council will require that any land set aside for this purpose must be landscaped and made safe in the interim.

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.

Sustainable development

UDP Policies	BE12 <i>Sustainable Design Principles</i> & SPG19 <i>Sustainable Design, Construction and Pollution Control</i> , EP10 <i>Protection of Surface Water</i> , EP11 <i>Water Supply – Demand Management</i> , EP12 <i>Flood Prevention</i> , EP13 <i>Water Run Off – Source Control</i> , EP14 <i>New Energy, Renewable Energy and Fuel Storage Development</i> , W8 <i>Construction / Demolition / Commercial Waste</i>
LP Policies	4A.7 <i>Energy Efficiency and Renewable Energy</i> , 4A.8 <i>Energy Assessment</i> , 4A.9 <i>Providing for Renewable Energy</i> , 4A.11 <i>Water Supplies</i> , 4B.1 <i>Design Principles for a Compact City</i> , 4B.6 <i>Sustainable Design and Construction</i> , 4C.8 <i>Sustainable Drainage</i>

9.12 The Council will require that the development achieves an acceptable level of sustainability, by implementing the requirements of Adopted UDP Policy BE12 and SPG19, through Brent's Sustainable Development Checklist (at the planning stage) and independent verification of standards achieved onsite.

9.13 Specifically, the applicant will be required to

- include appropriate design measures in the development for those energy and water conservation, sustainable drainage, sustainable /recycled materials, pollution control, and demolition/construction commitments made within Brent's Sustainability Checklist and other submitted documentation (or agreed by further negotiation), and adopt adequate procurement mechanisms to deliver these commitments.
- on completion of the development, independent evidence (through a BRE Post Construction Review) shall be required on the scheme as built, to verify the implementation of these sustainability measures onsite, and the achievement of an 'Excellent' rating in accordance with EcoHomes, BREEAM and SPG 19 standards. 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.
- If the evidence of the above reviews, show that any of these sustainability measures have not been implemented within the development, then the applicant shall either:
 - propose acceptable measures to remedy the omission; or, if this is not feasible,
 - propose acceptable compensatory measures on site; or otherwise,
 - pay to the Council a sum equivalent to the cost of the omitted measures, which the Council accepts would be difficult to implement onsite. Such an in-lieu payment would be used by the Council to offset this deficiency in sustainability terms, elsewhere in the Borough

A thorough financial appraisal will be required from the developer should the developer wish to motivate that the required sustainability standards cannot be met on site.

9.14 Cumulative Sustainability Plan

Should the site be developed on a phased basis by a single developer, a Cumulative Sustainability Plan may be required prior to the first reserved matters/ detailed planning application and with each subsequent application. The intention of the Cumulative Sustainability Plan is to ensure environmental resource efficiency is incorporated into the design, construction and ongoing operation of the development(s), to ensure that sustainability measures / targets are achieved and this is reviewed on a block-by-block or phase-by-phase basis, and enables further phases to compensate for any failure to meet targets set for prior phases.

9.15 Sustainable Urban Drainage Systems (SUDS)

The council will require the inclusion of sustainable urban drainage systems in all new developments in this area. A Drainage Impact Assessment should be conducted to identify which 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.

9.16 Waste

The Council will require the production of a Site-wide Waste Management Strategy and the funding and implementation of this strategy. The purpose of such a strategy is to reduce as far as possible waste resulting from the use and occupation of the development. This Strategy should adopt the procedures of the ICE Resource Sustainable Communities (RSC) Waste Management & Infrastructure Code of Practice.

Furthermore, a strategy should include:

- provision of convenient communal waste management facilities (for residential and commercial users) within the redeveloped area; and
- provision of integrated waste management facilities that would allow energy to be recovered from non-recyclable waste.

9.17 Energy

The Council will require a Site-wide Energy Strategy to be developed for the site. The objective of the Strategy is to minimise energy consumption and maximise the use of renewable energy sources.

9.18 The developer must 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 renewable energy sources;
- community heating for heating and cooling;
- heat pumps; and
- gas condensing boilers and gas central heating.

9.19 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.

9.20 The Energy Strategy will need to include:

- 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;
- what energy conservation measures will be implemented in each development, beyond the 2006 Building Regulations Part L;
- the technical and economic feasibility 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;

- proposed 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;
- analysis of the potential for future developments on adjoining sites to link with energy infrastructure established on the development site;
- Study of the implications of emerging technologies, such as fuel cell CHP, microCHP for individual dwellings and biomass fuelled CHP;
- 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; and
- 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.

9.21 The strategy will need to provide calculated energy demands, savings or generation 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.

9.22 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)

9.23 In addition, a Green Tariff of up to 10% of off-site energy supply from renewable sources, 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.

Community

UDP Policies CF5 *Community Facilities in Large Scale Developments, and EMP3 Childcare Facilities in Employment Development*

9.24 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. a healthy living centre, 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.

9.25 The Council will consider the need to safeguard financial contributions for childcare costs of prospective employees and safeguard this subsidy over a defined period of time. Qualifying employees would have to be defined to ensure there is a need for subsidy, for example by household income qualification. Care provision for older children before and after school or during school holidays may also be considered as could support 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.

Education

UDP Policy CF6 *School Places*

9.26 Where the residential element would clearly require the provision of additional school places, 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 London Boroughs of Brent and Ealing.

Open Space / Public Realm

UDP Policies BE7 *Public Realm: Streetscape*, OS7 *Provision of Public Open Space*, OS18 *Children's Play Areas*, PR1 *Major Developments in Park Royal*, PR3 *Public Realm Improvements in Park Royal*, and PR 5 *Park Royal Western Gateway Opportunity Site*

9.27 The Council will seek to secure a monetary contribution towards the ongoing '10,000 Trees in Park Royal' Project – a project which works to improve the green quality of the public realm across Park Royal.

9.28 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.

9.29 If housing is provided on the former lorry park site the Council will require the provision and maintenance of a children's play area.

Employment & Training

UDP Policy EMP4 *Access to Employment Opportunities*

LP Policy 3B.12 *Improving the Skills and Employment Opportunities for Londoners*

9.30 The Council will seek to secure financial contributions towards the provision of job brokerage and training activities which directly target local people (including those in the London Borough of Ealing), with the aim of providing them with the best possible opportunity of accessing the new jobs created.

9.31 The Council's preferred method of delivery is to work through a joint venture arrangement with the developers and end users, via its Brent in2work partnership.

9.32 The following will be sought:

Construction Employment Strategy

To ensure that the developer undertakes to provide a range of employment and training opportunities for local residents and businesses as part of the construction phase of the development. This will include:

- Cash contribution to delivering bespoke training and job brokerage services through the Building One Stop Shop;
- Employment by the developer of a workplace co-ordinator to co-ordinate employment activities and act as a single point of contact for the Building One Stop Shop team;
- Provision of an agreed number of trainee / apprenticeship places on site;
- Timely provision of a specified and relevant information flow regarding schedules of works, timetables, skill requirements, vacancies and necessary monitoring information.
- Provision of office, meeting room and interview room space on site.
- Timely, transparent and locally visible tendering arrangements for works, to allow local companies the opportunity to bid.

End User Employment Strategy

To set out how the developer intends to pass on training and job brokerage responsibilities to tenants and end users of the development. This will include:

- Cash contribution to delivering bespoke training and job brokerage services through the Brent in2work partnership;
- Ongoing provision of office, meeting room and interview space if similar alternative local space is not available;
- Timely provision of a specified and relevant information flow regarding end users, timetables, skill requirements and necessary monitoring information.
- Timely brokering of 'inception' meetings between end users / tenants and Brent in2work.

Partnership

To fully participate in the established Brent in2work partnership network, through attendance at quarterly partnership meetings and provision of timely information about progress on site.

Premises for new starter businesses / Small to Medium Sized Enterprises (SME)

To safeguard subsidisation of any premises for new starter businesses or SMEs for a defined period.

Affordable Housing

UDP Policies H2 *Requirement for Affordable Housing*, H3 *Proportion of Affordable Housing Sought*, H5 *Key Worker Housing*, and H9 *Dwelling Mix*

9.33 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.

9.34 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.

Housing

9.35 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.

Public Art

UDP Policy TEA4 *Public Art*

9.36 A contribution will be sought towards providing permanent or temporary public art event(s), installation(s) or piece(s), including the reasonable expenditure on procurement, management, public engagement/ consultation and maintenance.

9.37 Such art may be installed/ take place within the public realm of the development or in the local vicinity of the site and will be selected in close cooperation with the owner/ developer/ residents and users of the development.

Air Quality

UDP Policy EP3 *Local Air Quality Management*
LP Policy 4A.6 *Improving Air Quality*

9.38 The site falls within the Borough's Air Quality Management Area (AQMA), as a result the Council will require contributions to be made towards the monitoring of air quality and the implementation and monitoring of the Air Quality Action Plan in the vicinity of the site.

Section 38 & 278 Agreements

9.39 Section 38 & 278 Agreements may be required with the Highway Authority to enable necessary highway works, pursuant to the Section 38 & 278 of the Highways Act 1980.

9.40 Section 38 Agreements are required where new roads are created in order to enable the Council to adopt new roads as public highway. Any ongoing commitments would need to be part of a legal agreement.

9.41 Section 278 Agreements will typically be required where new road access points are created onto existing roads or development necessitates off-site highway enabling works, for example pedestrian crossing facilities or traffic calming measures.

CCTV

UDP Policy BE5 *Urban Clarity & Safety*

9.42 The Council will require the developer(s) to fund, provide or procure and maintain, as part of the Development and in accordance with agreed phasing, CCTV cameras and associated systems to ensure that adequate security surveillance of pedestrian access and movement within and across the site, as well as across adjacent vulnerable areas is provided. Particular regard is to be had to open spaces and pedestrian / cycle ways.

10. Planning Application Requirements

10.1 Next Steps

The Council wish to see the comprehensive re-development of the whole SPD site area considered in a single planning application (which may be phased).

10.2 Environmental Impact Assessment

The single application approach promoted by the Council is likely to require an EIA (as set out in Policy EP1). This will be clarified when a screening opinion is requested.

10.3 Employment Strategy

The Council will require the submission of an approved employment strategy to plan the direct provision of employment and training opportunities, for local residents (including those in the London Borough of Ealing. This strategy must give particular regard to the needs of women and BME groups and cover;

- Local employment during construction and within the completed development; and
- Direct provision of employment and training initiatives by the developer.

10.4 Construction Method Statement

A Construction Method Statement will be required to detail methods for minimising / processing construction waste, and nuisance to surrounding users / residents.

10.5 Land Contamination and Remediation Strategy

An investigation will be necessary to establish;

- If any contamination is present;
- The hazard posed; and
- The necessary remedial measures required.

As previously stated at section 7 *Sustainable Development & Environmental Standards* 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.

10.6 Sustainability Checklist

All applications for planning are expected to apply the principles of sustainable design and construction to their development proposals. This is managed through a self assessment process involving the completion of a sustainability checklist. Any scheme on this site meeting the SPG19 thresholds will be expected to complete the checklist and achieve an 'excellent' rating. The sustainability checklist is a vital tool as;

- It makes applicants (and officers) more aware of what sustainable development means and what they should submit or seek, to deliver it locally;
- It allows the likely effects of proposals to be identified and potentially improved;
- It integrates the sustainable design objectives listed above, with other environmental and socio-economic objectives in the UDP. Schemes that address all these aspects achieve the best sustainability ratings; and
- It provides a 'level playing field' – used on all schemes above the SPG threshold.

10.7 Cumulative Sustainability Plan

In the event of phased developments, a cumulative sustainability plan may be required to ensure that progress towards measures / targets are continuously reviewed and necessary amendments made.

10.8 Energy Strategy

A site-wide energy strategy should be submitted to outline how energy consumption is to be minimised and use of renewable energy sources maximised. Detailed content to be included as outlined in section 13 *Planning Obligations*.

10.9 Waste Management Strategy

A site-wide waste management strategy should be submitted to outline how the reduction of waste is to be managed, funded and implemented. It should include;

- provision of convenient communal waste management facilities (for residential and commercial users) within the redeveloped area; and

- provision of integrated waste management facilities that would allow energy to be recovered from non-recyclable waste.

10.10 Air quality assessments

Developments will require an air quality assessment where a significant change in air quality is expected or anticipated. There will also be a need to assess air quality implications where a significant change in relevant exposure (i.e. introduction and increase) is anticipated, such as the building of residential properties in an area of already poor air quality.

The decision as to whether an air quality assessment is required or not should be based on the physical characteristics of the proposals and / or the changes in traffic flows predicted. For industrial type development, an air quality assessment will be required when processes are permitted under the PPC, LAAPC (where deemed appropriate) or waste management licensing regime.

Some professional judgement will be required but the following should be considered default criteria for triggering an air quality assessment:

- Proposals that will result in a change in either traffic volumes of 5% AADT or peak, or a change in vehicle speed of ± 10 kph, or both, on a road with greater than 10,000vpd;
- Proposals that would significantly alter the traffic composition in an area (e.g. bus stations, HGV parks, increased delivery traffic) and increase local congestion;
- Proposals that include new car parking (>300 spaces) or coach or lorry parks;
- Proposals for industrial or commercial development with a floor space >2500m², and proposals for major employment generators;
- Developments located in, or which may affect, sensitive areas (e.g. ecological sites) or areas of poor air quality (including AQMAs), where either direct emissions to air occur, or where any of the preceding criteria are met.

A balance must be struck between burdening developers with unnecessary assessments, and ensuring that all significant impacts are quantified. It would be reasonable, however, for policies to be biased towards the latter. Planning Policy Statement 23 (Planning and Pollution Control), published in November 2004, provides a further account (Appendix 1G) of when and where the preparation of an Air Quality Assessment by a developer will be necessary or desirable:

- Locations where AQMAs encompass regeneration areas;
- At a proposed development site to clarify the exact position of proposed exceedences within an AQMA, for the purpose of focusing impact mitigation effort;
- Within an AQMA where developments such as hospitals, schools and housing are proposed, it may be the case that an EIA is not required, due to generated traffic volumes not being sufficient. In such a case, an Air Quality Assessment may provide the necessary mechanism for considering ventilation provision and the location of opening windows and doors etc. in relation to exposure.

10.11 Drainage Impact Assessment / Drainage Plan

A drainage impact assessment / drainage plan will be required to ensure that due consideration has been given to the impact of the proposed development on the catchment area. It should include an assessment of both flood and pollution risk. There should be an assessment of the suitability of methods for waste and surface water drainage available for the site in question and a programme for the implementation of the best available option.

10.12 Archaeological Assessment

An assessment of the archaeological potential of the site will need to be conducted, and the impact that the development will have on upon any archaeological remains present will be to be appraised.

10.13 Urban Design Framework

Policy PR5 requires an urban design framework to be submitted as part of any planning application on this site. However, section 3 *Urban Form & Design Requirements* has identified the need for a detailed masterplan. Therefore a masterplan will be required; it will need to include consideration of the following matters;

- Urban Design Statement (to satisfy Policy BE1 *Urban Design Statements* and SPG4 *Design Statements*);
- Landscape strategy;
- Streetscape strategy;
- Movement strategy; and
- Access statement.

The Council would be prepared to work with land owners / developers to produce a masterplan for the site prior to an application being submitted. As outlined in section 8.1 *Urban Form & Resign Requirements* the masterplanning process will need to have regard to the wider implications of any redevelopment particularly across the rest of the Park Royal estate.

10.14 Transport Assessment (including Green Travel Plan)

A formal Transport Impact Assessment will be required, providing information on the 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. 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.

10.15 Planning Statement

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.

10.16 Public Consultation Requirements

Brent's draft Statement of Community Involvement (SCI) sets out Council's policy on how local communities and stakeholders should be involved in the consideration of planning applications. The SCI recommends that applicants produce a consultation strategy setting out how they intend to engage the community prior to the submission of a significant planning application. This seeks to provide a mechanism for developers to focus pre-application consultation, working with communities on appropriate development proposals before applying for planning permission. The SCI recommends that the applicant consider use of the following;

- Inform the community via local advertisement;
- Place an announcement in the Brent Magazine;
- Produce a web page providing details;
- Mail drop those directly affected by the scheme;
- Produce promotional / informative literature;
- Present / be available for Q & A at the relevant ACF(s) & UCF(s);
- Hold open meetings;
- Be party to participation exercises;
- Provide display sessions;
- Where appropriate engage community involvement specialists to assist / facilitate process;
- Be party to meetings with selected stakeholders groups to assist in brokering agreements and obtaining informal feedback;
- Appropriately advertise any such meetings;
- Provide formal feedback to those engaged as to how their views have been considered and reflected in the application submitted to the Council; and
- Submit to the Council as part of the planning application a participation statement setting out how the requirements of the SCI have been satisfied, the representations received and how these have been considered and reflected in the application submitted.

Appendix A. Policy Checklist

(UDP = Brent Unitary development Plan, LP = the London Plan)

Section 7. Sustainable Development

Relevant Development Plan Policies

UDP BE12 SUSTAINABLE DESIGN PRINCIPLES

Proposals should embody sustainable design principles, commensurate with the scale and type of development, including taking account of:

Sustainable Design

- (a) Incorporating built forms, technologies, orientation and layout that will contribute to reduced energy consumption (e.g. ventilation, heating / cooling, lighting) and associated emissions;
- (b) Avoiding negative micro-climatic effects (e.g. wind turbulence, noise reflection);
- (c) The potential for the re-use of existing buildings and materials and environmental effect of building materials used;
- (d) Making adequate, integrally-designed provision for the storage and recycling of waste;
- (e) The potential for the management or recycling of water;

Sustainable Construction

- (f) Methods to protect important flora, fauna and / or topographical features during construction and to minimise disturbance to local amenity;
- (g) Methods to maximise recycling and re-use, as well as minimising waste during demolition and construction;

Pollution Control

- (h) Sustainable remediation of brownfield sites redeveloped for sensitive uses, will be sought, and where contamination remains in-situ, a monitoring regime will need to be agreed;
- (i) Measures to minimise the impact of poor air quality on sensitive users in Air Quality Management Areas (See Policy EP3); and
- (j) Noise levels from traffic, trains (near railway lines) or other significant noise-generators.

In assessing the sustainability of schemes under these headings, regard will be had to the supplementary planning guidance.

UDP EP1 ENVIRONMENTAL IMPACT ASSESSMENT

Where a development is judged likely to have significant effects upon the environment by virtue of factors such as its nature, size and / or location, a statutory environmental statement will be required to be submitted with the application. This should also assess the need for the development and alternatives to it, mitigation and monitoring measures.

UDP STR3	<i>Sustainable Development</i>
UDP STR5	<i>Reducing the Need to Travel</i>
UDP STR10	<i>Investment in and Improvement to Public Transport Facilities</i>
UDP STR13	<i>Environmentally Sensitive Forms of Development</i>
UDP BE11	<i>Intensive and Mixed-Use Developments</i>
UDP BE12	<i>Sustainable Design Principles</i>
UDP EP2	<i>Noise & Vibration</i>
UDP EP3	<i>Local Air Quality Management</i>
UDP EP4	<i>Potentially Polluting Development</i>
UDP EP9	<i>Water Quality</i>
UDP EP10	<i>Protection of Surface Water</i>
UDP EP11	<i>Water Supply – Demand Management</i>
UDP EP13	<i>Water Run Off – Source Control</i>
UDP EP14	<i>New Energy, Renewable Energy and Fuel Storage Development</i>
UDP W8	<i>Construction / Demolition / Commercial Waste</i>
UDP EMP10	<i>The Environmental Impact of Employment Development</i>
UDP PR1	<i>Major Developments in Park Royal</i>
UDP PR3	<i>Public Realm Improvements in Park Royal</i>

LP 2A.1	<i>Sustainability Criteria</i>
LP 4A.6	<i>Improving Air Quality</i>
LP 4A.7	<i>Energy Efficiency and Renewable Energy</i>
LP 4A.9	<i>Providing for Renewable Energy</i>
LP 4A.11	<i>Water Supplies</i>
LP 4A.14	<i>Reducing Noise</i>

Section 8.1 Urban Form & Design Requirements

Relevant Development Plan Policies

BE11 INTENSIVE AND MIXED-USE DEVELOPMENTS

Proposals for higher densities than that prevalent in the surrounding area will be encouraged in appropriate locations, which will include town centre locations in Areas of Very Good & Good Public Transport Accessibility (as defined in the Transport Chapter section 6.7), and transport interchanges (Policy TRN6). Proposals in these areas are encouraged to include a mix of compatible land uses.

Proposals in the above locations, or for a change of use, that fail to incorporate an appropriate element of secondary use(s), where single uses would undermine the existing character or prejudice the regeneration prospects of an area, will be resisted, taking into account:

- (a) The scale and nature of the proposed development relative to the mix of land uses in the surrounding area, and
- (b) The feasibility of incorporating secondary use(s) given the nature of the primary use and the site characteristics.

Particular attention will be paid to the design of intensive and mixed-use developments, which should achieve a satisfactory relationship between individual units and uses in terms of their layout, stacking, the adjoining area(s) between them, and protection of the amenity of adjoining and proposed residents.

Uses open to visiting members of the public (such as shops and food and drink uses) should be located to have a significant ground floor window display and entrance.

Residential accommodation (other than live-work) should be functionally independent of commercial or business uses and should be separately accessed at street level.

UDP STR11	<i>Quality and Character of Built & Natural Environment</i>
UDP STR14	<i>Quality of Urban Environment</i>
UDP STR15	<i>Enhancing the Public Realm</i>
UDP BE1	<i>Urban Design Statements</i>
UDP BE2	<i>Townscape: Local context & Character</i>
UDP BE3	<i>Urban Structure: Space & Movement</i>
UDP BE4	<i>Access for Disabled People</i>
UDP BE5	<i>Urban Clarity & Safety</i>
UDP BE7	<i>Public Realm: Streetscape</i>
UDP BE9	<i>Architectural Quality</i>
UDP BE10	<i>High Buildings</i>
UDP BE15	<i>Transport Corridors & Gateways</i>
UDP BE17	<i>Building-Services Equipment</i>
UDP EMP12	<i>Public Realm Enhancement in Employment Areas</i>

Section 8.2. Land Uses

Relevant Development Plan Policies

UDP STR1	<i>Priority Uses</i>
UDP STR23	<i>Protection of SEAs & BEAs</i>

UDP STR24	<i>Regeneration of SEAs & BEAs</i>
UDP STR25	<i>Development of Business Parks</i>
UDP STR28	<i>Regenerating Areas Important to London as a Whole – Park Royal</i>
UDP PR5	<i>Park Royal Western Gateway Opportunity Site</i>
UDP EMP4	<i>Access to Employment Opportunities</i>
UDP EMP6	<i>Employee Facilities in Strategic Employment Areas</i>
UDP EMP8	<i>Protection of Strategic and Borough Employment Areas</i>
UDP EMP11	<i>Regeneration of Employment Areas</i>
UDP EMP15	<i>Location of B1 Business Development</i>
UDP EMP16	<i>Business Parks and / or Technology Parks</i>
UDP EMP18	<i>General Industrial Developments</i>
UDP EMP19	<i>Warehouse Developments</i>

LP 2A.2	<i>Opportunity Areas</i>
LP 3A.19	<i>Medical Excellence</i>
LP 3A.22	<i>Higher and Further Education</i>
LP 3B.5	<i>Strategic Employment Locations</i>
LP 3B.6	<i>Supporting Innovation</i>
LP 3B.9	<i>Creative Industries</i>
LP 3B.12	<i>Improving the Skills and Employment Opportunities for Londoners</i>

Section 8.4 Connectivity

Relevant Development Plan Policies

TRN6 INTENSIVE DEVELOPMENT AT SELECTED TRANSPORT INTERCHANGES

Intensive development is supported on appropriate sites at /adjoining the following existing or proposed transport interchanges:

- Kilburn (Jubilee Line);
- Kilburn High Road;
- Park Royal Interchange (see Policy PR5);
- Queens Park;
- Willesden Junction Hub;
- Wembley Central (see Policy WEM30);
- Wembley Park (see Policy WEM31);
- Wembley Stadium (see Policy WEM32).

Development should make full and effective use of the site, have a mix of land uses, (if required to by Policy BE11) and should be orientated around pedestrians, buses and cyclists (with good links to the transport interchange), rather than the private car.

The phasing and nature of development should ensure that it complements the comprehensive development of the area.

UDP STR5	<i>Reducing the Need to Travel</i>
UDP TRN1	<i>Transport Assessment</i>
UDP TRN2	<i>Public Transport Integration</i>
UDP TRN3	<i>Environmental Impact of Traffic</i>
UDP TRN6	<i>Intensive Development at Selected Transport Interchanges</i>
UDP TRN10	<i>Walkable Environments</i>
UDP TRN11	<i>The London Cycle Network</i>
UDP TRN14	<i>Highway Design</i>
UDP TRN16	<i>The London Road Network</i>
UDP TRN35	<i>Transport Access for Disabled People & Others with Mobility Difficulties</i>
UDP PR1	<i>Major Developments in Park Royal</i>
UDP PR2	<i>Transport Improvements in Park Royal</i>
UDP PR5	<i>Park Royal Western Gateway Opportunity Site</i>
UDP TRN22	<i>Parking Standards – Non-Residential developments</i>
UDP TRN34	<i>Servicing in New Development</i>
UDP TRN31	<i>Design and Land Take of Car Parks</i>

Section 8.5 Landscaping

Relevant Development Plan Policies

BE6 PUBLIC REALM: LANDSCAPE DESIGN

A high standard of landscape design is required as an integral element of development schemes. This will be expected to include:

- (a) A design which reflects the way in which the area will be used and the character of the locality and surrounding buildings;
- (b) An adequately landscaped frontage (including trees and shrubs) on commercial developments outside town centres;
- (c) Retention of existing mature trees, shrubs and hedges, particularly where these form part of the character of an area;
- (d) New planting of an appropriate specification (species, size, density of planting) with semi mature or advanced nursery stock;
- (e) New, integrally-designed, structural landscaping on appropriate larger sites ;
- (f) Boundary treatments such as: fencing, railings, etc. which complement the development and enhance the streetscene;
- (g) Screening of access roads and obtrusive development from neighbouring residential properties; and
- (h) Approval of any landscape scheme and implementation, management and/or maintenance programmes, before work on site commences.

UDP STR11	<i>Quality and Character of Built & Natural Environment</i>
UDP STR13	<i>Environmentally Sensitive Forms of Development</i>
UDP STR15	<i>Enhancing the Public Realm</i>
UDP BE6	<i>Public Realm: Landscape Design</i>
UDP BE33	<i>Tree Preservation Orders</i>
UDP TRN31	<i>Design and Land Take of Car Parks</i>
UDP PR1	<i>Major Developments in Park Royal</i>
UDP PR3	<i>Public Realm Improvements in Park Royal</i>

Section 9. Planning Obligations

Relevant Development Plan Policies Providing Planning Obligations Justification

UDP CF6	<i>School Places</i>
UDP CF5	<i>Community facilities in large scale developments</i>
UDP TRN4	<i>Measures to make Transport Impact Acceptable</i>
UDP TRN9	<i>Bus Priority</i>
UDP TRN11	<i>The London Cycle Network</i>
UDP TRN23	<i>Parking Standards – Non-Residential Developments</i>
UDP TRN24	<i>On Street Parking</i>
UDP TRN23	<i>Parking Standards – Residential Developments</i>
UDP TEA4	<i>Public Art</i>
UDP EMP3	<i>Childcare Facilities in Employment Developments (p.154)</i>
UDP EMP4	<i>Access to Employment Opportunities (p.155)</i>
UDP EP10	<i>Protection of Surface Water</i>
UDP EP11	<i>Water Supply – Demand Management (p.72)</i>
UDP EP12	<i>Flood Prevention (p.72)</i>
UDP EP13	<i>Water Run Off – Source Control (p.73)</i>
UDP EP14	<i>New Energy, Renewable Energy, and Fuel Storage Development (p.74)</i>
UDP EP3	<i>Local Air Quality Management</i>
UDP EP15	<i>Infrastructure</i>

UDP W8	<i>Construction/ Demolition/ Commercial Waste (p.241)</i>
UDP OS7	<i>Provision of Public Open Space</i>
UDP OS18	<i>Children's Play Areas</i>
UDP H2	<i>Requirement for Affordable Housing (p. 85)</i>
UDP H3	<i>Proportion of Affordable Housing Sought</i>
UDP H9	<i>Dwelling Mix</i>
UDP PR1	<i>Major Developments in Park Royal (p.247)</i>
UDP PR2	<i>Transport Improvements in Park Royal</i>
UDP PR3	<i>Public Realm Improvements in Park Royal</i>
UDP PR5	<i>Park Royal Western Gateway Opportunity Site</i>
LP 4.A.7	Energy Efficiency and Renewable Energy
LP 4.A.8	Energy Assessment
LP 4.A.9	Providing for Renewable Energy
LP 5D.2	<i>Opportunity Areas in West London</i>

Section 10. Planning Application Requirements

Relevant Development Plan Policies

UDP PR5	<i>Park Royal Western Gateway Opportunity Site</i>
UDP TRN1	<i>Transport Assessment</i>
UDP W9	<i>Construction / Movement of Spoil</i>
UDP EP1	<i>Environmental Impact Assessment</i>
UDP BE1	<i>Urban Design Statements</i>
LP 4A.8	<i>Energy Assessment</i>

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3. Supplementary Planning Guidance on renewable energy.
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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
5. ODPM. Planning Policy Statement 22: Renewable Energy
http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_030334.hcs
[p](#)

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