



Draft Residential Amenity Space and Place Quality Supplementary Planning Document

Consultation Statement

June 2023

This Consultation Statement has been prepared in accordance with Regulations 12 and 13 of the Town & Country Planning (Local Planning) (England) Regulations 2012 and the Council's Statement of Community Involvement.

What was consulted upon?

The Residential Amenity Space and Place Quality Supplementary Planning Document (SPD) related to relevant policies in the Development Plan, in particular the Council's Local Plan Policy BH13.

Why is the SPD needed?

The SPD sets out further guidance on the implementation of two Brent Local Plan 2022 policies: BH13 Residential Amenity Space and BD1 Leading the Way in Good Urban Design.

The Residential Amenity Space and Place Quality SPD clarifies the borough's expectations for well-designed places. It supports the Brent Local Plan's objectives to ensure that new homes and neighbourhoods are designed to provide a high quality of life. This is for existing and future residents across the borough's different environments, scales of development and densities.

Well-designed residential amenity space is a key factor in enriching people's lives. It supports people's physical and mental wellbeing, enables social connection, builds strong and integrated communities, encourages mixing between different ages and demographics, and nurtures a sense of belonging. Prioritising nature and green spaces in neighbourhoods brings many benefits for both people and planet.

The draft SPD has been brought forward following an evidence review of the implementation of the policies. This identified the need for further clarity to address how any shortfalls against the private amenity standard for individual dwellings could be provided through shared communal space. For higher density development in Brent, greater guidance is also required on the necessary quality of communal space, particularly in cases where provision would be below the minimum size standard.

It is important to point out that the SPD does not create new policy, it simply provides guidance and information on the implementation of existing Local Plan policies in relation to residential amenity and good urban design.

It covers a wide range of amenity space types and sizes. It addresses; outdoor private amenity space; outdoor shared amenity space; and indoor shared amenity space and common spaces. It may also be used to determine the quality of public space where relevant to the assessment of a scheme.

As such it has the scope to impact the majority of shared spaces within new residential developments. These spaces are a significant factor in the quality of development. They are key to the way new and existing residents experience their homes, neighbourhoods, and a sense of community. People's quality of life is directly affected by their environment. High quality environments are beneficial to health, wellbeing and social cohesion. Poor quality environments are not; they exacerbate existing inequalities.

The objective of the SPD is to provide a clear roadmap for proportionate expectations for different types and scales of development which contribute towards improving people's quality of life.

As adopted, the document will be given significant weight as a material consideration in the determination of planning applications. The Council will work with applicants early on in the application process seeking compliance with the SPD to ensure acceptable developments.

Area of coverage

The London Borough of Brent, with the exception of areas in which the Old Oak and Park Royal Mayoral Development Corporation is the local planning authority.

What consultation took place?

In drafting the SPD, engagement has occurred with internal teams including Spatial Planning and Transport, Development Management, Policy and through the Major Cases Forum, to shape the final contents. All are positive about the document and recognise its intention to improve quality of life through the design of places. This SPD emphasises the importance of shared spaces for young people as a "Place Quality Priority" and the SPD is supported by the Director for Children and Young People.

Formal public consultation took place between 16th February and 30th March 2023.

Steps the Council took to publicise the draft SPD.

The Council publicised the draft SPD by:

- a) emailing consultees on the planning policy consultation database (over 1000 addresses);
- b) publicising via the Council's online consultation portal;
- c) making hard copies available in the Brent Civic Centre and Brent Council public libraries;
- d) making it available on the Council's website.

Responses

In specific response to the draft SPD consultation, a total of ten sets of responses were made, six from residents, one community group, one developer and two agents representing developers. A summary of the representations received, officer response and where appropriate recommended changes to the SPD are set out in Appendix A Consultation Responses below.

All the responses were generally supportive of the SPD. Where there were amendments suggested, these are for specific items or wordings which have been addressed. No significant revisions have been required and any changes are to provide further clarification only.

Changes to the SPD

As set out in Appendix A there were some recommended changes to clarify any points raised in the consultation and to confirm when the Amenity Space Quality Statement requirements will be applicable. The SPD was also updated to reflect that the consultation has been undertaken.

Adoption date

The Council adopted the RASPQ SPD on the 12th June 2023 and subsequently issued the relevant notifications.

Appendix A Consultation Responses

Ref	Name/ Organisation	Paragraph / Section	Representation summary	Officer response	Proposed change
1	Resident 1	General	Generally supportive of SPD. Comments: Inclusion of visual amenity / outlook is supported as this can make a difference to the quality of the unit even if no open space	Noted	No change
2	Resident 1	General	Comments: Minor developments should be 6 or less, 10 is too large.	The definition of Minor Development is part of established Council policy	No change
3	Resident 1	General	Comments: The SPD does not cover issues such as maintenance of communal gardens, storage water butts, issues in taller buildings of a wind tunnel effect and the need for robust planting in communal gardens for extreme weather	<p>The SPD covers maintenance of communal gardens in Section 3.5 Stewardship, Management and Maintenance.</p> <p>The SPD sets out that “the council may expect management and maintenance plans for communal amenity spaces to be set out and may apply planning conditions for landscape. This will depend on the scale, context and nature of a scheme. Management can create a positive user experience for those living in a development. The plans should confirm that the quality and value of amenity space is achieved and sustained in the long-term.”</p> <p>The specific items raised are details that would be addressed through a management and maintenance plan.</p>	<p>Change paragraph 3.5.3 to:</p> <p>“...The plans should confirm that the quality and value of amenity space is achieved and sustained in the long-term. <u>This can include the provision of robust planting.</u>”</p>

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4	Resident 2	Paragraph 1.2.4	Generally supportive of SPD. Comments: Paragraph 1.2.4 setting out "When to Use this Guidance" is supported.	Noted	No change
5	Resident 3	General	Generally supportive of SPD. Comments: Things need to be put in place to improve infrastructure (GP Surgeries, Schools etc). No use just building blocks of flats with none of the necessary facilities available without having to travel long distances to access them.	The scope of the SPD is limited to residential amenity space and does not cover social infrastructure.	No change
6	Resident 4	General	Generally supportive of SPD. Comments: Well-illustrated	Noted	No change
6	Resident 4	Figure 4	Comments: Suggestion to clarify that the private amenity space shown as examples in the illustrations is not the only expected solution and the design should fit the location and context, and be varied in type for interest on a building. For example winter gardens on busy roads, projected surrounding courtyards (particularly in N/E aspects) and at lower levels, recessed balconies and semi-recessed in southern aspects and higher levels. Also the winter gardens illustrated are fully projected - again developer may take this literally so a caveat should be included to ensure that balconies should be designed to complement the building in addition to not projecting over the highway.	Noted	Change Figure 4 caption to: "Examples of private amenity space."
7	Resident 5	General	Generally supportive of SPD. Comments: This document provides a really useful framework for guiding the design of public space in a context driven way. This is particularly useful in a	Noted	No change

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			<p>diverse borough such as Brent. I also like that it places greater onus on developers to think about these issues as opposed to putting further pressure on under resourced councils.</p> <p>The document is really effective at bringing sociological theories about public space which are well researched and then putting it into a document that works within the context of the planning system.</p>		
8	Resident 6	General	<p>Generally supportive of SPD. Comments: Supports that the borough is trying to improve the design of buildings.</p>	Noted	No change
9	Resident 6	General	<p>Missing an explicit ban on astro turf as it's not environmental friendly, it's not resilient and it's actually quite awful to look at. Low quality design item.</p>	<p>The SPD emphasises sustainability and green infrastructure in Section 2.3 and throughout the document, to support biodiversity, sustainability, climate resilience as well as provide environments that support people's health. To this end, green infrastructure is specifically defined as a "Place Quality Priority" in paragraph 5.3.2, which gives this higher weight in the assessment of amenity space. The document also signposts to the new Sustainable Development SPD which sets out the council's requirements in detail with regards to urban greening and green infrastructure.</p>	No change

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10	Harlesden Mutual Aid	General	Generally supportive of SPD. Comments: No comment, consultation survey response indicates general support of SPD	Noted	No change
11	Quod on behalf of Atlip House Limited	Paragraph 3.2.4 & 3.2.5 – Private Amenity Space Requirements	<p>The current guidance identifies that where private external amenity space cannot be provided then compensatory additional internal space may be acceptable. It is recommended that the guidance is explicit in terms of the acceptable form of internalised amenity space, and should expand the exceptional case threshold (Paragraph 3.2.4) to include environmental considerations such as noise and air quality to which internalised amenity spaces may be preferable.</p> <p>This would accord with Figure 9, which shows the appropriateness of winter gardens in mitigating undesirable environmental factors.</p> <p><i>3.2.4 - All assessments are made in the context of the site, scheme and wider area. They will need to balance the benefits and the specific factors that are relevant on a case-by-case basis. In exceptional cases, it may</i></p>	<p>The SPD addresses environmental conditions and requirements in Section 3.4 and this should be read in conjunction with Section 3.2 Private Amenity Space Requirements.</p> <p>This is highlighted in paragraph 3.2.3 “Expectations Environmental requirements: With regards to light, noise and pollution (see Section 3.4)”.</p> <p>The suggested minor amends accord with this intention.</p>	<p>Change paragraph 3.2.4 to:</p> <p>“...In exceptional cases, it may not be possible to provide external amenity e.g. where balconies would <u>be exposed to undesirable environmental factors</u>, impact daylighting, urban form, or cause other adverse impacts.”</p> <p>Change paragraph 3.2.5 to:</p> <p>“Where external private amenity space cannot be</p>

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			<p><i>not be possible to provide external amenity e.g. where balconies would impact daylighting, urban form, <u>be exposed to undesirable environmental factors</u> or cause other adverse impacts.</i></p> <p><i>3.2.5 Where external private amenity space cannot be provided, this may be mitigated by a higher provision and quality of internal space, above minimum nationally described space standards (e.g. <u>winter gardens or oversized units</u>). Additional internal space is usually expected to be equivalent to London Plan private amenity area requirements as a minimum. In such cases, the overall living conditions will be considered on balance. A lack of external private amenity space may also be mitigated by the provision and quality of communal amenity.</i></p>		<p>provided, this may be mitigated by a higher provision and quality of internal space, above minimum nationally described space standards <u>(e.g. winter gardens or oversized homes).</u>”</p>
12	Quod on behalf of Atlip House Limited	Paragraph 3.3.8 – Privately Owned Public Space	<p>The responder opposes the blanket exclusion of all privately owned public spaces from contributing to the communal amenity space calculations in line with adopted Policy BH13 of the Brent Local Plan.</p> <p>Further clarification is required to define what is deemed a ‘privately owned public space’ and hence would not contribute to the communal amenity provision of a development.</p> <p>Figure 5 of the RASPQ-SPD indicates that public space (i.e. parkland) retained within a private ownership would not qualify as communal amenity space. The distinction of private ownership or otherwise is not defined under Paragraph 3.3.3 of the RASPQ-SPD.</p>	<p>The SPD provides further guidance in the instances where the numerical area of private amenity space cannot be met, as set out in Local Plan policy BH13. For area calculations, it is only private amenity that is a policy requirement. The provision of communal amenity in area is counted on balance.</p> <p>This is set out in paragraph 5.7.1 “There may be instances where the policy requirements cannot be fully met. In these cases, a hierarchy of value and mitigating factors provides further guidance “</p>	<p>Change paragraph 3.3.1 to:</p> <p>“In certain cases, schemes may be reliant on high quality communal amenity space to reach the full area policy requirement. This section defines <u>communal amenity spaces as those that are located within and/or accessible to a specific development and sets out what counts as communal amenity space as a minimum</u></p>

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			<p>Notwithstanding, we consider this approach may set an unhelpful precedent and result in parts of developments that previously would have served a shared public and resident function (such as dedicated play space at ground level) being gated in order to be considered as ‘communal amenity’ for the purposes of Policy BH13. We consider this outcome would be contrary to Policy D5 (Inclusive Design) and Policy S4 (Play and informal recreation) of the London Plan and should be reviewed.</p> <p>Furthermore, the supporting text (Paragraph 6.2.98) of adopted Policy BH13 of Brent Local Plan states that the calculation of amenity space should not “include any parking, cycle or refuse and recycling storage areas”. It does not distinguish the ownership of the land as an exclusionary factor.</p>	<p>In Section 5.7, the Hierarchy of Value and Mitigating Factors (Table 8), sets out the relative value assigned to different types of spaces.</p> <p>Whilst privately-owned public space (POPs) is not included in the area calculation, it will be considered as the highest priority mitigating factor.</p> <p>This is because a public space is not for the exclusive use and benefit of the residents. In some cases, POPS may be detached from the scheme.</p> <p>The ownership of the land is not an exclusionary factor. The definition has been made between publicly-accessible spaces and those that are for residents only.</p> <p>This definition is necessary since communal amenity space is expected to be provided for the residents’ use and enjoyment, in the cases where sufficient private amenity cannot be provided. Therefore privacy and security are important baseline considerations, in meeting equivalent needs. Furthermore the sense of community and ownership afforded by spaces that belong to</p>	<p>threshold for all schemes. Further guidance for different sizes and types of development is found in Section 4 and Section 5.”</p> <p>Change paragraph 3.3.8 to:</p> <p>“Privately owned public space (POPS) is <u>not included in communal amenity space calculations. See Section 3.4 for further information.</u>”</p> <p>Add new Section 3.4 Privately Owned Public Space.</p> <p>Add new Paragraph 3.4.1:</p> <p>“Privately owned public space (POPS) describes a type of public space that is privately owned, but legally required to be publicly accessible. Whilst, POPS is not included in communal amenity space area calculations, it may however be used to</p>

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				<p>the resident community is not achieved to the same extent in a publicly-accessible space such as POPS.</p> <p>It is accepted that this has to be balanced with the benefits of providing communal space that is open to public use, but this does not have equivalent benefits in privacy, security, sense of belonging and ownership afforded by communal amenity space.</p> <p>In all cases, each development is assessed on a case-by-case basis in the context of the site, scheme and local area (Paragraph 5.7.4). Gating spaces for the purposes of increasing area calculations is not recommended.</p>	<p>support the justification for a lower provision of communal amenity space.”</p> <p>Add new paragraph 3.4.2:</p> <p>“Unlike communal amenity space, POPS is not solely located within and/or accessible to a specific development. It does however help support the integration of developments into their physical and human context. As such, it also has potential benefits for quality of life, community and green infrastructure (see Section 5.4).”</p> <p>Add new paragraph 3.4.3:</p> <p>“POPS will need to satisfy all of the same design quality requirements for communal amenity space, as well as other requirements to ensure it is publicly accessible. The provision of POPS in lieu of communal amenity space</p>

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					will be assessed on a case-by-case basis in accordance with the Hierarchy of Value and Mitigating Factors set out in Table 8.”
13	Quod on behalf of Atlip House Limited	Paragraph 5.4.1 – Place Quality Toolkit	Our client is not opposed to the introduction of an Amenity Space Quality Statement to support future major development planning applications, however, the need to provide this additional documentation should not be imposed until the RASPQ-SPD has been formally adopted and/or where an existing PPA is in place with the Council that does include the requirement for an Amenity Space Quality Statement to be submitted.	Amenity Space Quality Statements (ASQS) will only be required once the SPD has been adopted. This will apply to all existing PPAs, however due consideration will be given to schemes submitting applications shortly after adoption if the production of an ASQS is likely to adversely impact programme.	No change
14	Quod on behalf of Atlip House Limited	Paragraph 6.2.1 – Co-living	<p>Our client supports the distinction of co-living housing from more traditional housing types in respect of residential amenity space standards. We recommend that the residential amenity space standards at Paragraph 4.9.2 (External Communal Space) of the draft Large-scale Purpose-built Shared Living LPG (January 2022) should be replicated within the RASPQ-SPD, and distinction should be provided that co-living housing is except from the amenity standards applied to other housing types under Policy BH13.</p> <p>Where a mix of traditional (C3) and co-living (sui generis) housing is provided, the relevant standards will apply to their specified housing typologies in isolation.</p>	<p>In line with other references to guidance documents or relevant standards, the SPD signposts users to the draft Large-scale Purpose-built Shared Living LPG (January 2022) in paragraph 6.2.1.</p> <p>Further clarification of this is added for avoidance of doubt.</p> <p>Whilst the quantitative space standards are lower than traditional housing (C3), the SPD clarifies the need for greater expectation on the quality of amenity space provided at schemes of greater density, see paragraph 6.3.1.</p>	<p>Add new paragraph 6.2.3:</p> <p><u>Co-living developments are expected to comply with the space standards set out in the Large-scale Purpose-built Shared Living (LSPBSL) LPG - draft 2022).</u></p>

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15	Quod on behalf of Atlip House Limited	General	Subject to our recommended amendments, Atlip House Limited are supportive of the RASPQ-SPD	Noted	No change
16	Quintain	General	<p>Quintain prides itself on the quality of residential amenity space it has delivered over the past 15 years at Wembley Park. Every apartment delivered by Quintain has its own private amenity space, typically in the form of a balcony or private terrace. In addition, approximately 25% of the 85-acre masterplan is made up of communal residential gardens and terraces for the sole use of residents. These spaces include lawns and gardens, BBQ areas, allotments, children’s play parks, dog exercise areas, and even an outdoor cinema screen. The residential buildings also include high quality internal amenity spaces such as:</p> <p>Lobbies and Lounges; Dining rooms and kitchens; ‘Break out’ spaces; Libraries; Gyms; Work from home areas; A child’s play cabin; Clubhouse</p> <p>In addition to the resident’s amenity space, approximately 25% of the masterplan is provided as Privately Owned Public Space (POPS) for use by the residents and visitors to Wembley 365 days a year.</p> <p>We are pleased to see all of the above amenity spaces are acknowledged within the SPD as providing a valuable resource in terms of resident’s health and wellbeing, building a sense of community and belonging and creating vibrancy and inclusivity at Wembley Park</p>	Noted	No change

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17	Quintain	General	It is important to note that, whilst we recognise the value of private amenity space for residents, within build to rent developments the overall amenity space will rarely if ever be provided solely through private amenity space. This would not be consistent with one of the key principles of the build to rent model which is to build a cohesive and integrated community through the use of communal amenity spaces both informally and formally.	Noted	No change
18	Quintain	General	<p>Typically, within Wembley Park, our residential developments deliver between 12sqm-15sqm of amenity space per apartment which is made up from a mixture of private amenity space, and external and internal communal amenity spaces. Notwithstanding the fact that all of our buildings are high density and close to or at full occupancy, the amenity spaces do not feel crowded, overused or in short supply. We consider this demonstrates that the target of 20 sqm per apartment is not justified in all cases.</p> <p>At Wembley further mitigation is also provided through the POPS Quintain have delivered including the Union Park, Repton Gardens, Arena Square and other meanwhile open spaces such as Samovar Space and the Wembley Play Park. These spaces are clearly very successful and attractive to residents a point which is further demonstrated by other developers also relying upon them in their planning submissions, despite not paying for their implementation or maintenance</p>	The SPD does not create new policy but only provides further guidance on meeting the policy BH13.	No change
19	Quintain		We are pleased to see recognition within the SPD of the role internal amenity spaces can play within	Whilst the value of good quality internal amenity space is	

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			<p>amenity provision. Such spaces are an important part of the build to rent model and, unlike external amenity spaces, they can be used by residents at all times of the day and night and throughout the year. When well-designed they can be highly flexible spaces used informally by residents as break out areas or more formally to hold social events and gatherings to build a strong sense of community and inclusivity within the building.</p> <p>The spaces can also be used much more intensively than external spaces meaning that a relatively small area of internal amenity space can successfully supplement external amenity space.</p>	<p>acknowledged as part of the Hierarchy of Value and Mitigating Factors (Table 8), the value of high quality external amenity space is greater due to the greater benefits that open and green spaces have for health and wellbeing, which is widely acknowledged.</p> <p>Table 8 sets out that high equality external communal amenity and privately-owned public space will have greater value and weight in assessment than provision of internal communal amenity. However it is accepted that in high density contexts there may need to be a balance of internal and external communal amenity. Each development is assessed on a case-by-case basis in the context of the site, scheme and local area (Paragraph 5.7.4).</p>	
20	Quintain		<p>The SPD sets out the Council's priorities for residential amenity space including community gardening and food growing, social interaction, children and young people, and Quintain have designed our amenity spaces to accommodate all of these uses and priorities. However, the SPD doesn't include any guidance on dog exercise areas which are a important element that should be discussed. Quintain have</p>	<p>The SPD Place Quality Priorities (Section 5.3) set out key aspirations and critical issues that the council is seeking to address, enhance and support.</p> <p>Whilst dog exercise areas have benefits, this is not considered a</p>	No change

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			delivered a number of dog exercise areas both within the communal residential gardens and the POPS around Wembley and these are very well used spaces by our residents. The inclusion of dedicated dog exercise areas also ensures those residents without dogs can enjoy the wider amenity space whilst the maintenance and management issues associated with dog usage can be contained to the dedicated areas where more appropriate and hardwearing landscaping and materials are provided.	priority in addressing major challenges. This feature can be described and included as part of the Amenity Space Quality Statement, which is purposefully flexible to enable applicants to explain the detailed benefits of the amenity space design and provision.	
21	Quintain		The requirement for Amenity Space Quality Statement to be prepared and submitted is another level of detail that will need to be factored into the already 'document heavy' planning application process and we hope the Council has sufficient trained staff resources to review these in a timely manner so as not to delay determination. Further, we would welcome additional detail within the SPD on how these statements will apply to outline applications, full applications, and reserved matter approvals.	<p>Policy BH13 already requires the consideration of external amenity space and the evaluation of whether the quality and quantity is sufficient. ASQS will provide a framework for the submission of information to demonstrate that a high standard has been achieved, and will assist the consideration of such matters rather than placing further burdens on staff resources.</p> <p>The requirement to include external amenity space of sufficient quality and quantity was also inherent in the previous 2016 policy the Unitary Development Plan and associated guidance which preceded this. Applications for the approval of Reserved Matters are typically submitted pursuant to applications approved under these policies, and</p>	Add new paragraph 5.4.7: <u>"Amenity Space Quality Statements are required for all full and outline planning applications, and applications for the approval of reserved matters. They may also be required for Section 73 applications where the quality and/or quantity of external amenity space is proposed to materially change."</u>

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				<p>must be accompanied by sufficient information to demonstrate that the quality and quantity of external space is appropriate. It is considered appropriate to seek the submission of an Amenity Space Quality Statement for relevant Reserved Matters applications in addition to new applications for outline or full planning permission. Whether this will also be necessary for applications to vary conditions attached to previous consents will depend on the nature of the changes proposed, so a ASQS may not be required for all Section 73 applications</p>	
22	Quintain		<p>Finally, it is noted that some planting, footpaths, and circulation space are not considered to count toward the communal amenity space calculation. We do not consider this is appropriate and these areas should be included. For example, why do pathways around the amenity space not count when pathways to play facilities in the amenity areas count? Footpaths provide a functional but important element of the amenity space enabling residents to access the space whilst providing opportunities to walk, sit, exercise and cycle / scoot within the space, especially for younger children. This is particularly the case in the larger area POPS such as Union Park where the footpath around the park provide will provide a 600m informal jogging circuit, a boardwalk around the pond, and an area where the Wembley Park Soundshell</p>	<p>Primary circulation routes would typically be excluded given that their function is to provide access.</p> <p>However, secondary paths incorporated into communal or open spaces which primarily serve the open space may be included in some instance. Vehicular access will not normally be included.</p> <p>Hard surfaced roof terraces can be included providing the quality is sufficient and is a useable space for residents enjoyment and benefit.</p>	<p>Change paragraph 3.3.5 to:</p> <p>“Spaces that are not usable, beneficial and enjoyable to residents are not typically included as amenity space. Typical exclusions from area calculations may include, but not be limited to:</p> <ul style="list-style-type: none"> • Unusable space e.g. thin strips of planting, though these may contribute to visual

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			bandstand will be located. There may also be situations where the amenity space is 100% hard landscape e.g roof terrace areas, how will these be assessed? Strict adherence to these guidelines could lead to poor design by encouraging developers to design amenity space primarily to meet the calculations resulting in resulting in narrow / limited pathways and planting areas.	Please also see Comment 23 below.	amenity; <ul style="list-style-type: none"> • Inaccessible, isolated or hard to reach spaces; • Enclosed space without outlook e.g. light-wells; • Space abutting residential windows and facades; • Defensible space and planted buffers, though these may contribute to visual amenity; • <u>Primary</u> paths or circulation space bounding an amenity space; • Sloped areas, though these may contribute to visual amenity, <u>unless it can be demonstrated that these provide usable amenity space</u>; and • Exposed areas e.g. areas that are exposed to high levels of traffic movement and thus poor noise and air quality unless that can be adequately mitigated.
23	Avison Young on behalf of Hollybrook	Section 3.3	1. Communal Amenity Space Exclusions Section 3.3 of the SPD sets out guidance on providing high quality communal amenity spaces and notes that	Noted as per Comment 22 above	Changes as per Comment 22 above

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	Neasden (Propco 1) Ltd		<p>a number of areas are excluded from amenity space area calculations including sloped areas and paths and circulation routes. In our view, although primary circulation routes should be excluded from the calculations given that their function is to provide access, secondary circulation routes which meander through amenity spaces can provide high quality amenity spaces. In addition, although areas which are significantly sloped do not function as useable amenity areas, areas which are gently sloping or stepped can provide high quality spaces and contribute to a diversity of types of amenity space within proposals. We have provided within Appendix I a number of precedents which demonstrate where sloped/stepped and secondary circulation spaces contribute positively to the overall success of amenity spaces within schemes. We therefore consider that paragraph 3.3.5 of the SPD should be reworded as follows (amendments in red):</p> <p><i>Typical exclusions from area calculations may include, but not be limited to:</i></p> <ul style="list-style-type: none"> • <i>Unusable space e.g. thin strips of planting, though these may contribute to visual amenity;</i> • <i>Inaccessible, isolated or hard to reach spaces;</i> • <i>Enclosed space without outlook e.g. light-wells;</i> • <i>Space abutting residential windows and facades;</i> • <i>Defensible space and planted buffers, though these may contribute to visual amenity;</i> • <i>Primary paths or circulation space bounding an amenity space;</i> 		

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			<ul style="list-style-type: none"> • <i>Sloped areas, though these may contribute to visual amenity, <u>unless it can be demonstrated that these areas provide useable amenity space</u>; and</i> • <i>Exposed areas e.g. areas that are exposed to high levels of traffic movement and thus poor noise and air quality unless that can be adequately mitigated.</i> 		
24	Avison Young on behalf of Hollybrook Neasden (Propco 1) Ltd	Paragraph 3.2.5 paragraph 3.4.7	<p>2. Noise and Air Quality Mitigation</p> <p>Paragraph 3.2.5 of the SPD states that <i>“Where external private amenity space cannot be provided, this may be mitigated by a higher provision and quality of internal space, above minimum nationally described space standards. Additional internal space is usually expected to be equivalent to London Plan private amenity area requirements as a minimum. In such cases, the overall living conditions will be considered on balance. A lack of external private amenity space may also be mitigated by the provision and quality of communal amenity.”</i></p> <p>This is in line with the approach within the Housing SPG (2016) which states that additional internal space may be provided in lieu of private amenity space in circumstances where site constraints make the provision of external amenity space impossible. In our experience, this tends to be where microclimatic conditions (including noise, air quality and wind) make external amenity space unsuitable. Given that the SPD acknowledges that there are some circumstances where additional internal space is acceptable, we consider that this should be specifically included in</p>	The suggested additional clarification is in line with paragraph 3.2.5.	Change paragraph 3.4.7 to: <i>“...Optimising the sound insulation provided by the building envelope or green infrastructure;</i> <ul style="list-style-type: none"> • <i>Glazed, ventilated winter-gardens or recessed balconies; and</i> • <i><u>The provision of additional internal space equivalent to London Plan private amenity space standards, as a minimum.”</u></i>

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			<p>paragraph 3.4.7 which sets out design principles to mitigate noise as follows:</p> <p><i>“Design principles to mitigate noise can include:</i></p> <ul style="list-style-type: none"> • <i>Reducing the impact of adjoining activities or the local environment’s noise e.g. the orientation and/or location of amenity space;</i> • <i>Incorporating noise barriers and screening;</i> • <i>Optimising the sound insulation provided by the building envelope or green infrastructure;</i> • <i>Glazed, ventilated winter-gardens or recessed balconies; and</i> • <i>The provision of additional internal space equivalent to London Plan private amenity area requirements, as a minimum.”</i> 		
25	Avison Young on behalf of Hollybrook Neasden (Propco 1) Ltd		<p>3. High Density and Build to Rent Schemes</p> <p>We note that the SPD sets out at Paragraph 5.3.4 that in high-rise, high density and Build to Rent development, social interaction is more typically difficult to achieve organically. In this context, the qualities of internal communal spaces can be particularly important in supporting neighbourliness and building community. Given this guidance, we consider that wording should be added to the SPD to specifically note that in Build to Rent schemes, flexibility should be applied to the requirement for external amenity space where it can be demonstrated that high quality internal amenity spaces have been provided which are better suited to this typology, providing that the development still provides a balance of internal and external spaces.</p> <p>The SPD also sets out that high rise buildings can be associated with higher turnover rates, neglect of</p>	The role of internal communal amenity is acknowledged in the SPD and set out in the Hierarchy of Value and Mitigating Factors (Table 8).	<p>Change paragraph 6.1.3 to:</p> <p><u>“High-rise buildings, as part of high density developments, can present opportunities and benefits for residents when they are carefully designed to meet people’s needs with high quality spaces that are enjoyable to experience, support quality of life and create a sense of belonging.”</u></p> <p>Add new paragraph 6.1.4:</p>

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			<p>common spaces, low social trust and architectural design that supports anonymity and that spatial constraints can often result in the provision of communal amenity space either on rooftops or in the public realm. However, well composed and designed tall building schemes can offer high quality of life for residents, benefitting from high levels of privacy, high percentage of dual aspect units, low noise levels and access to good air quality and great, long views for all homes. With attention and a sensitive approach to different needs, vibrant; active; inclusive; and safe vertical neighbourhoods can be created with high quality living spaces that all residents enjoy living in. Good designs acknowledge that the wellbeing of people is of high importance and include a wide range of different types of flexible, shared external and internal communal amenity areas that are adaptable for future changes. With careful design, great places can be created where communities thrive.</p> <p>We therefore consider that this section of the SPD should acknowledge that high rise typologies can create exceptional living spaces, if designed well and that communal amenity spaces on rooftops or in the public realm can also deliver high quality spaces which provide additional benefits such as high levels of privacy, high percentage of dual aspect units, low noise levels and access to good air quality and great, long views for all homes.</p>		<p><u>However, when not well-designed or well-managed, high-rise buildings can also present challenges and be associated with higher turnover rates, neglect of common spaces, low social trust and architectural design that supports anonymity. When not properly addressed, spatial constraints can sometimes result in the provision of communal amenity space that feels like an afterthought, being small, overshadowed and unwelcoming.</u> It is therefore important to consider these design guidelines. This will make sure the quality of the scheme and communal amenity areas supports the quality of life and needs of residents. Emergency evacuation plans for communal amenity spaces above ground level should also</p>

Ref	Name/ Organisation	Paragraph / Section	Representation summary	Officer response	Proposed change
					be considered at an early stage.
26	Historic England		No comments	Noted	No change
27	National Highways		No comments	Noted	No change
28	Natural England		No comments	Noted	No change
29	Transport for London		No comments	Noted	No change