

## **Appendix 1 Summary of Responses to the Draft South Kilburn Supplementary Planning Document and Recommended Proposed Changes**

Consultation responses and proposed changes to the document are set out in the recommendations below. Additions to text are underlined whilst deletions are highlighted with ~~strikethrough~~.

<b>General</b>	
Respondent	Canals and River Trust
Response	No Comment
Officer Response	Noted
Recommendation	No change
Respondent	Highways England
Response	No Comment
Officer Response	Noted
Recommendation	No change
Respondent	Greater London Authority
Response	The draft SPD is supported; generally in line with London Plan policy and welcome the net increase of 1940 homes. May wish to supply more detail when lead officer returns from leave and trust this would be acceptable.
Officer Response	Noted, no addition detail has subsequently been supplied.
Recommendation	No change
Respondent	South Kilburn Trust
Response	In general there are lots of very positive aspects to the SPD, however the Trust also has some of the concerns and questions.
Officer Response	Noted, the concerns and questions are addressed in the relevant sections of this summary of representations received.
Recommendation	No change
Respondent	Leslie Barson and Dee Woods: Representing Users of The Granville Plus Centre and The Carlton Centre
Response	6 week consultation period is inadequate for a document that has fundamental implications for the future of the area. The vagueness of the document along with the inaccuracies make it virtually meaningless and allow the Council to do anything in South Kilburn, making any idea of a consultation farcical.
Officer Response	The 6 week period for representations is considered appropriate. It is more than the minimum 4 weeks required in SPD regulations and is akin to the consultation period usually set for Development Plan documents which have a higher status than SPDs. The representation does not take account of the extensive continual engagement that

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	occurred as part of the 2016 masterplan update process, including on the Carlton and Granville Centres of which the draft SPD is a subsequent step. There were respondents who indicated that they could not meet the deadline for response. Most provided clarity on when they could respond by. The Council has accepted all (three to date) representations made after the 6 week deadline. In terms of its 'vagueness', the document has sought to balance the need for clarity with sufficient flexibility for it to not get out of date/be so restrictive that it cannot reflect changes in circumstance.
Recommendation	No change
Respondent	Leslie Barson and Dee Woods: Representing Users of The Granville Plus Centre and The Carlton Centre
Response	Insufficient justification is given for the redevelopment of existing buildings; refurbishment is brushed aside as unviable. It is on paltry and inadequate information people are expected to agree to a massive reconstruction of their lives
Officer Response	The inadequacy of the majority of the stock and its lack of potential for economic refurbishment was a key driver in the area being identified for the 'New Deals for Communities' scheme which kick-started the estate's comprehensive plan for regeneration/refurbishment. Where refurbishment is a realistic prospect that can result in a high quality end product consistent with the regeneration principles, it has and will continue to be considered when each of the sites is taken forward in the development process.
Recommendation	No change
Respondent	Leslie Barson and Dee Woods: Representing Users of The Granville Plus Centre and The Carlton Centre
Response	The vision is not the vision of the people of South Kilburn. It is an imposed vision whose prime purpose is to maximize housing. This has no long term benefits for the people of South Kilburn nor does it address the council's own aims such as "improved public realm" (Masterplan Consultation Website) building for health and happiness. In fact it feels that the views are used to justify the decisions the Council wants with those decisions not necessarily in the interests of those who live and work in South Kilburn. They may coincide but they may not. The document has so many inaccuracies that it is hard to believe the people writing it really knew or were interested in South Kilburn. Its platitudes and disingenuous statements skew the reader to the decision the Council would like to see but don't show the full picture. Brent Council should sign up to Community Engagement Principles as defined in the National Standards for Community Engagement ( <a href="http://www.scdc.org.uk/what/national-standards/">http://www.scdc.org.uk/what/national-standards/</a> ) putting these into action in South Kilburn to make some recompense for the years of bad practice.
Officer Response	The vision is an update of the original South Kilburn SPD, informed by the New Deal for Communities work. It has been subject to extensive engagement and reflects the opportunities that the area provides taking account of the area's social, environmental and economic assets within the wider macro context that exists; particularly the need for viable delivery of new social rent dwellings, greater tenure diversity in the area, update of and additional provision of social infrastructure, increased opportunity for residents plus updated London planning policy which requires the

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	<p>efficient use of land.</p> <p>Identifying that the masterplan has no long-term benefits for the people of South Kilburn is clearly inconsistent with the evidence of what has been achieved so far, including feedback from tenants who have moved into new dwellings, or accessed new/updated facilities. It also ignores the external validation of the work achieved for example by the Mayor of London. The Council recognises that regeneration is more than just a physical process 'done' to the local community; it complicated and requires engagement/support/participation and covers a multiplicity of issues. The Council has sought to follow good principles of regeneration wherever it can and for the vast majority of resident's/local community groups, this is evidenced by a positive feedback. Inaccuracies have not been identified by the respondent and their response contains the type of sweeping generalisations it identifies the Council exhibit in the SPD. The masterplan process since 2005 and regeneration of the estate has quite rightly given the proposed level of change exhibited substantial levels of sustained engagement.</p>
Recommendation	No change
Respondent	Simon Wookey (Resident Malvern Mews)
Response	Reasonably happy with the document.
Officer Response	Noted
Recommendation	No change
Respondent	Ashleye Gunn
Response	Overall it's good to see that the draft SPD continues to emphasise the need to deliver a real neighbourhood, rather than just packing in as many flats as possible.
Officer Response	Noted
Recommendation	No change
Respondent	Simon Wookey (Resident Malvern Mews)
Response	Not displacing the community and keep things to just one move is laudable. However, with such a long development schedule the need to accelerate the pace is obvious. Economies of scale can be brought to bear as well as delivering a more cohesive development.
Officer Response	It is recognised that this principle does cause logistical and financial complications, increasing both timescale and cost. At this stage however, it is not proposed to amend this principle. Nevertheless, it will remain under review and in particular should South Kilburn residents who are part of the decant process indicate the need for a different approach this will be considered.
Recommendation	No change

<b>Chapter 1 Introduction</b>	
Respondent	David Walton Resident Malvern Road
Response	Use the term Kilburn Park for the only remaining large park size Brent Kilburn public open space remaining.
Officer Response	The term South Kilburn Park will be used and the SPD proposes this to be the case moving forward.
Recommendation	No change
Respondent	David Walton Resident Malvern Road
Response	<b>Figure 2</b> needs to show that Granville New Homes built on and destroyed the Granville Road Public Open Space as a phase 1 A project. Noted also in text here must be the replacement of this Granville Road major public open space loss within 8 years as was promised to this community in SKSPD April 2005. In 2017 very important this given the escalating overbuild total clearances policy being pursued by Brent since 2005.
Officer Response	The phases identified in the document relate to the work programme of the South Kilburn Estate Regeneration Team. The Granville New Homes and Thames Court developments which have been delivered are identified in Appendix 2 as part of the contributing developments on Council owned South Kilburn estate sites. Improvements and provision of additional open space as set out in the document will occur.
Recommendation	No change
Respondent	David Walton Resident Malvern Road
Response	<b>Paragraph 1.15:</b> The estate does not border West Hampstead
Officer Response	The reference is to the South Kilburn Growth Area, but it is accepted it should be South Hampstead rather than West Hampstead.
Recommendation	<b>Paragraph 1.15</b> last sentence: "It borders the affluent residential neighbourhoods of Maida Vale, Queen's Park and West South Hampstead."

<b>Chapter 3 Development Principles for South Kilburn</b>	
Respondent	Sport England
Response	<b>Paragraph 3.2:</b> Sport England and Public Health England have produced Active Design Guidance that aims to inform the urban design of places. It sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities. It is strongly recommended that these principles and concepts are fully reflected in the SPD. This could include providing links to the document itself for reference. Sport England would happily liaise further with the Council in exploring how the Active Design principles could be further entrenched with the SPD.
Officer Response	The SPD has sought to create a neighbourhood that is designed to promote the physical and psychological well-being of the area's population and visitors. All the 10 principles are specifically addressed in the SPD. As such it is

<b>Chapter 3 Development Principles for South Kilburn</b>	
Recommendation	considered that the document could make specific reference to documents that reference the Active Design principles. <b>Paragraph 3.2</b> Add final sentence. “Addressing these issues is consistent with creating healthy and sustainable communities, for example as identified in the principles of Sport England and Public Health England’s Active Design Guidance.”
Respondent	Brent Clinical Commissioning Group
Response	<b>Paragraph 3.4</b> (5 Health and Wellbeing), 7.5 and 7.12 refer to the delivery of a new health centre as part of the Peel redevelopment. Whilst supported in principle, we would like to suggest that other options may need to be explored if the Peel Centre facility is not affordable for the CCG or the scale and timing of growth is slower than expected.
Officer Response	The Council believes that the new health centre will be affordable for the CCG as the rent charged will be set at a fair value by the District Valuer. Should the Health Centre not be acceptable to the CCG, then the Peel development is likely to require a significant reconfiguration internally, some of which could accommodate the minimum GP provision required. Other sites in the Council’s ownership could also potentially be amended to accommodate any outstanding health needs. It is not envisaged that there will be a delay in the delivery of Peel. The Council through its extensive dialogue is aware of the CCG’s timescales and is pressing ahead with delivery of the Peel with associated health centre which it considers a critical element in the regeneration of the area.
Recommendation	No change
Respondent	Ashleye Gunn
Response	There is an aspect of the plan that seems to go against both the aims to improve the public realm and create a real sense of community, and the importance given to environmental and sustainability considerations. This is the opening up to through traffic of Malvern Road and making it a secondary street, and possibly the extension/reconnection of Canterbury Road with Carlton Vale. I have focused in this consultation response on Malvern Road.
Officer Response	As a result of representations received the Council has become aware of recent changes to Saltram Crescent by Westminster Council. These do impact on what was proposed in the draft document and could potentially turn Malvern Road into a rat run if left unchanged. As a result, it is now proposed that Malvern Road is essentially left as is although the pedestrian/cycle route that currently exists between the two schools will be enhanced to provide a clearer and higher quality environment. This will require various amendments to the Transport and Movement Chapter and associated Figures.
Recommendation	<b>Chapter 8 Transport and Movement.</b> Figure 13: Amend to remove two way secondary street on Malvern Road where today it is pedestrian and cycleway and turn this into pedestrian and cycles only. Amend to remove Pedestrian and cycles only from Malvern Place and return this to as existing. <b>Figure 15:</b> Change to reflect what is proposed above in relation to Malvern Road and Malvern Place. <b>Principle T1:</b> Change this to reflect the changes identified above in relation to Malvern Road and Malvern Place.

<b>Chapter 3 Development Principles for South Kilburn</b>	
	<b>Chapter 12:</b> Carlton Infants' School: Change to: "In addition what was formerly Malvern Road highway land will be improved as a pedestrian and cycleway reinstated as highway to form a continuation of the street that links up with Malvern Place."
Respondent	Simon Wookey (Resident Malvern Mews)
Response	Future public realm improvements welcomed but concerns about existing remainder. E.g. Malvern Road pavements are uneven and unsafe, walk ways are cluttered, trees go untended and the facades of heritage buildings are simply worn out.
Officer Response	Existing S106 transportation receipts and potentially CIL receipts in the future are being considered for general street scene public realm works.
Recommendation	No change
Respondent	David Walton Resident Malvern Road
Response	Figure 7 Malvern Road. There are many versions/a movable feast of what is to happen to Malvern Road life in this 171 page document. The SKSPD 2005 kept Malvern Road closed as it has so many facilities and heavy traffic would degrade it as a landscaped heritage street and main cycle route. What exactly is the 2017 change to be and can the SPD be consistent in figures and text presented please? Residents are keen to oppose Malvern Road being opened to heavy north south vehicle traffic by Brent (a very low car use community, new car free flats here too so why change to fill our lungs and schools with pollution suddenly now mid delivery process 2017?)
Officer Response	See comment above, it is now proposed to not open Malvern Road along its whole length, it will essentially be kept as is.
Recommendation	No change
Respondent	David Walton Resident Malvern Road
Response	Figure 7. Enclosed inaccessible green spaces need to be defined better in colour coding terms here from public open green spaces accessible to all in society.
Officer Response	The different open space typologies are considered to be sufficiently distinct.
Recommendation	No change

<b>Chapter 4 Land Use</b>	
Respondent	Eric Lim (Resident Hansel Road)
Response	Supermarkets for a big shop are not in close proximity to the area which makes it difficult for those without a car. Are there plans for these types of facilities in the regeneration?
Officer Response	There are no definitive plans that would accommodate a large scale supermarket, the emphasis has and will be on

Chapter 4 Land Use	
	smaller scale shops, up to the size of M&S Simply Food. Additional retail is proposed to link Salusbury Road to the Peel Centre along Carlton Vale. However, larger supermarkets would be directed to more major centres first, consistent with national, London and local planning policy, rather than being planned for in South Kilburn's regeneration.
Recommendation	No change

Chapter 5 Design	
Respondent	David Walton Resident Malvern Road
Response	Figure 11. An estate of new towers? Balloted masterplan 2004 with 6 storey height controls is dead? Incredible overbuild is proposed and this key presentation Board was certainly not presented to the estate primary stakeholders at Review 2016. Will the over-build north of Carlton Vale pressure south? How will this small area cope with so many people Brent piled-up Brent no plan and Brent uncared for lives?
Officer Response	The increase in height is only in a small number of places and is relatively modest in comparison to what has been built and what exists already. The massing drawings/birds eye view of the estate were on the presentation boards/part of the material. The density proposed is consistent with that all over London for an area with this type of connectivity in close proximity to central London as sought in the London Plan.
Recommendation	No change
Respondent	Thomas Harrison
Response	Principle D1: Height along Carlton Vale should be limited to 6-8 storeys, rather than allowing taller buildings.
Officer Response	This would not reflect the Peel development which planning committee has been minded to approve. It is considered that some height along various parts of this road is acceptable/desirable taking into account the width of the street, the character of the area and London Plan policies which seek to encourage higher density in areas with high public transport accessibility.
Recommendation	No change
Respondent	David Walton Resident Malvern Road
Response	Figure 12. Existing and proposed open space needs to be better defined visually re Kilburn Park. It is highly doubtful given 'super prime gold mine elite exclusion culture' that Kilburn Park (South Kilburn Public Open Space) will ever extend east, while the existing park east side is no longer in the key here as existing when it in fact does exist? Figure 12, five category A trees at Chippenham Gardens Local Centre public square should be added to the key here correctly.
Officer Response	Figure 12 takes account of the proposed masterplan outcomes where the proposed new school site takes some of the

Chapter 5 Design	
	existing South Kilburn open space, but this is more than compensated for in terms of area and functionality by the release and incorporation of the existing Kilburn Park junior school. Chippenham Garden are subject to improvements associated with the Chippenham Gardens/Stuart Road planning permission. They are not category A trees, but non-are proposed for removal, apart from one to facilitate the proposed adjacent development.
Recommendation	<b>Figure 12:</b> Update where information is available on the quality of the existing trees.
Respondent	Simon Wookey (Resident Malvern Mews)
Response	Facilities and space required to store bins for waste, recycling, and organic are insufficient, this needs to be addressed in new development.
Officer Response	The new development will be subject to the Council's contemporary requirements for waste management and standards of space for receptacles/storage. In addition to this the South Kilburn Estate team is seeking to bring together a range of landlords with the Council's waste management function to improve existing management.
Recommendation	No change
Respondent	Historic England
Response	<p><b>Paragraph 5.19:</b> With regards to archaeology suggest the insertion of 'Where there is a risk of a development impacting heritage assets of archaeological interest, consultation should be carried out with the Great London Archaeological Advisory Service (GLAAS) and where deemed necessary an archaeological desk-based assessment should be submitted with the application. Where there is likely to be substantial harm an archaeological evaluation should also be carried out on site to inform the planning application.'</p> <p>'The Archaeological Priority Areas within Greater London are currently undergoing a programme of review and are being comprehensively updated using up to date evidence and consistent standards to comply with National Planning Policy. The Archaeological Priority Areas for Brent are due for review in 2019.'</p>
Officer Response	It is considered that there is some merit in making reference to what is suggested where development could potentially impact on archaeology but not the programme of review.
Recommendation	<p><b>Paragraph 5.19</b> Change to: "The Council considers that any surviving archaeological remains in the area have the potential to become a community or heritage asset. There is a potential for archaeological remains within South Kilburn due to the close proximity to Kilburn High Road, which follows the route of the Roman Watling Street. The High Road remained a major thoroughfare in the medieval period, with manors, religious houses and other settlement activity in the vicinity of the Kilburn High Road railway station. Therefore an archaeological desk-based assessment will be required to be submitted with the application. Where there is a risk of a development impacting heritage assets of archaeological interest, consultation should be carried out with the Great London Archaeological Advisory Service (GLAAS). Where there is likely to be substantial harm, an archaeological evaluation should also be carried out on site to inform the planning application, and if recommended, subsequent preservation and or interpretation."</p>

<b>Chapter 6 Housing</b>	
Respondent	South Kilburn Trust
Response	<p>There is a risk of creating a divided community – on the one hand of people in social housing, set against private housing - very expensive to buy, or at high rents on short tenancies. There are a huge swathe of people in between - people who are working, and can't get into social housing, but increasingly can't afford to live in South Kilburn, let alone buy or rent a space big enough for their family. Different tenures and opportunities needs to seriously be considered so as not to end up with community of, bluntly speaking, rich and poor. And so it needs to be considered whether making the most amount of money out of a site is the best thing to do for the regeneration of an area.</p>
Officer Response	<p>This scenario is one which officers are well aware of and is recognised in the SPD. The SPD identifies that ideally a wider range of tenures should be provided in the area. Nevertheless, it also identifies that firstly that the Council must make good on its promise to replace the number of existing social rented homes lost to the regeneration. Unfortunately in the financial climate within the public sector currently, without grant/additional external funds opportunities for provision of alternative tenure types will be very limited. Social rent properties are extremely expensive to subsidise. The only other alternative would be to increase density to create greater subsidy. The Council is not using South Kilburn as a money making exercise; all proceeds are recycled within the regeneration of the area. The Council takes a whole life view of its assets and functions balancing up commercial property values with its role as a wider supporter of the community a significant number of which are reliant on many of the services it provides.</p>
Recommendation	No change
Respondent	South Kilburn Trust
Response	<p>While there are some high quality individual blocks, the phase by phase approach has resulted in very different looking buildings run by different organisations, differently maintained, receiving different standards of service etc. How is this going to be managed over time, to gain consistency?</p>
Officer Response	<p>As identified in the draft SPD the procurement process associated with New Deal for Communities envisaged a single developer, unfortunately this failed due to the recession. As it happens, whilst this has created some issues associated with a variety of delivery organisations and consistency of service to tenants, it has also created many positives. The slower delivery has allowed learning and improvements to occur on each phase, whilst the emphasis on quality has produced individual architectural solutions that do not point to or can be regarded as a typical municipal solution with its associated stigmas. The Council has to ensure it gets best value for sites which means it is likely that it will appoint different developers for each parcel. In recognising some of the potential limitations of this approach, the Council is working on a proposal for agreement from all the various public sector landlords to create a forum so that</p>

Chapter 6 Housing	
	neighbourhood wide issues such as maintenance of public areas, etc., can be agreed/standardised approach taken.
Recommendation	No change
Respondent	David Walton Resident Malvern Road
Response	<b>Page 60/61</b> 2400 new homes of the masterplan ballot 2004. Now to be 3,492 new homes plus- this was not put to Review presentation 2016 either.
Officer Response	The masterplan review related to the South Kilburn estate, the draft SPD covers a wider area which adds to the dwellings total. However, it is accepted that the South Kilburn estate total has risen by approximately 400 dwellings net. This is due to additional opportunity sites being identified and increased densities consistent with the requirements of the London Plan adopted since 2005.
Recommendation	No change

Chapter 7 Community and Other Facilities	
Respondent	Leslie Barson and Dee Woods: Representing Users of The Granville Plus Centre and The Carlton Centre
Response	<b>Page 72</b> Community spaces are said "many are currently not high quality.".. "with the public having a low level of awareness of these facilities." The document then goes on to list the 'new community spaces' at 7.2 apparently not well known to the South Kilburn public. The new facilities identified as being delivered in the masterplan area have limited access/availability to the majority of the South Kilburn population. The Moberly Leisure Centre is about a mile from the estate, is for Westminster residents and does not take account of the tensions between South Kilburn and Westminster youths. We are highlighting the misinformation in this document to show how trust is lost when these sorts of 'facts' are published. To someone who knows South Kilburn, who lives and works there, it is hard to recognise the place described. To say that people do not know about the facilities in their area and then to list a mosque as one of those facilities is to misconstrue reality. It is vital when such huge decisions are being made on the basis of claims that they are truthful, accurate and clear. Not vague and ambiguous leading the reader to a conclusion consistent with the Council's plans.
Officer Response	Many of the older facilities are not consistent with modern day user requirements or asset management. They are small and inflexible spaces that are inefficient and allow only a limited range of uses. The SPD reports the outcome of the initial early engagement on the 2016 masterplan undertaken by independent community engagement consultants. This factual work identified that residents in South Kilburn were not aware of the opportunities provided by many facilities open to the public in close proximity. Whilst some might not be accessible due to price, or on people's radar because they might be operated by particular groups not regarded as open to all, some of these facilities are significant and are free to use, or have preferential rates for local residents e.g. St Augustine's Sports Hall and Paddington recreation ground. This indicates that perhaps greater awareness raising of these facilities is required.

Chapter 7 Community and Other Facilities	
	The Moberly will be a significant leisure facility and in sufficient close proximity to the South Kilburn estate from a needs perspective (Sport England methodology) for it to be considered an appropriate facility to serve the community. It is for Brent residents who will receive preferential entry rates pegged at those for Brent leisure centre facilities, as well as being available to Westminster's residents. Whilst the Council might be aware of and perhaps take into account gang boundaries, public sector financing issues do not allow the luxury of provision of facilities to be based on areas analogous with these and if it was, would probably help fuel those differences/divisions. The SPD highlights that the estate has been cut off from its surroundings and as such seeks to create an environment where residents feel part of the wider area and vice versa. This means attracting people from outside in and encouraging those in to look outside. The consultation highlighted for instance a local desire for cheaper tennis courts for younger people. This option is will be considered in terms of what can be provided within the improved South Kilburn Park.
Recommendation	No change
Respondent	David Walton resident Malvern Road
Response	<b>Page 73.</b> What happened to Core Strategy Policy CP23? All in use facilities should remain and they need Section 106 and CIL money quickly to stop being regarded still as 'super prime gold mine land'.
Officer Response	The regeneration of the area allows an opportunity to assess the fitness for purpose of existing facilities and whether re-provision in better more flexible facilities with greater opportunities for efficient use and lower overheads will ensure greater long term viability. CP23 is about ensuring that community facilities are protected/enhanced to meet needs, it is not necessarily about protecting facilities as is where an alternative solution will meet existing and future needs.
Recommendation	No change
Respondent	Brent Clinical Commissioning Group
Response	<p>It would be helpful if the SPD was supported by an overall assessment of infrastructure requirements, costs and priorities.</p> <p><b>Paragraph 7.12:</b> also refers to 'Doctors' surgeries in the locality are in very inadequate premises such as the Peel Precinct Surgery or have poor disabled access (Kilburn Park Medical Centre). This statement may be inflammatory so I would suggest something along the lines of 'the quality of the GP estate in the area is variable with many of the premises requiring investment or replacement in order to ensure that they are fit for purpose. There is a lack of capacity within the current GP estate and limited opportunity for expansion'.</p> <p>There has been no detailed discussion with the CCG in respect of what provision of the Peel health facility means in terms of whether it will be a shell and core or a turnkey facility.</p>
Officer Response	<p>The SPD identifies the area infrastructure that is required in association with the regeneration of individual sites in the site specific information and in each of the sections related to subject matter.</p> <p>In relation to the comment on the existing GP provision, this change is accepted.</p>

<b>Chapter 7 Community and Other Facilities</b>	
Recommendation	<b>Paragraph 7.12:</b> Change to 'Doctors' surgeries in the locality are in very inadequate premises such as the Peel Precinct Surgery or have poor disabled access (Kilburn Park Medical Centre). 'The quality of the General Practitioner (GP) estate in the area is variable with many of the premises requiring investment or replacement in order to ensure that they are fit for purpose. There is a lack of capacity within the current GP estate and limited opportunity for expansion'
Respondent	South Kilburn Trust
Response	<b>Paragraph 7.13</b> re employment opportunities. Opportunities provided through the development process for local residents have been limited to date. Only by Brent Council working increasingly closer with employers AND with organisations like the South Kilburn Trust who have really good access to local residents, will this work better. Furthermore the phase by phase approach has meant a new housing association comes in and tries to do something new rather than working with organisations like the South Kilburn Trust, to build on what is already going on and what's been working well. The South Kilburn Trust is the leading organisation working in this field in South Kilburn, and we aren't just a 'group' as referred to in the SPD.
Officer Response	The document could benefit from an amendment to make the existing providers clearer and encourage developers to work with them.
Recommendation	<b>Paragraph 7.13</b> Change to: "To improve this situation the Council is seeking to use a number of methods through its own activities and working with others, <u>including the South Kilburn Trust</u> . Included within this are S.106 obligations associated with development that require developers to provide apprenticeships/skills training places in construction and associated processes. For those uses that have end users that employ people this can also involve apprenticeships/training once the premises are completed. <u>The South Kilburn Trust have good access to local residents who require access to these types of opportunities and developers are encouraged to work with them.</u> The Council will also seek to work with site owners/developers to develop 'meanwhile' projects to try and stimulate the local economy and its activity." See other changes to paragraph 7.13 set out below in response to other comments provided by the Trust.
Respondent	South Kilburn Trust
Response	<b>Paragraph 7.13:</b> Stakeholders in Granville and Carlton are listed and offered continued support and service. Cabinet has endorsed working very closely with the South Kilburn Trust to develop an Enterprise Hub in Granville. Yet the South Kilburn trust is absent from the SPD. It needs to be afforded the same support as the other stakeholders and the work that it does in the area identified.
Officer Response	The draft SPD makes numerous positive references to the Trust and its role in both the proposed Enterprise Hub and its wider activities in South Kilburn. It is recognised that the Trust support the physical and social development of the area through their engagement with local residents, businesses and other key stakeholders. To reflect this role further

Chapter 7 Community and Other Facilities	
	a change to paragraph 7.13 is considered appropriate.
Recommendation	<b>Paragraph 7.13</b> Change to: "At the South Kilburn Studios (a meanwhile use <u>also delivered by the South Kilburn Trust</u> ) on Canterbury Road traineeships and weekly workshops are offered to local residents. <u>The Trust is an organisation that is an advocate of and provides significant support to the local community in seeking to improve all aspects of their quality of life.</u> Other support is provided by the Council through 'Brent Works' and <u>in association with the development process through training and apprenticeships, local groups active in the area such as the South Kilburn Trust.</u> "
Respondent	Leslie Barson and Dee Woods: Representing Users of The Granville Plus Centre and The Carlton Centre
Response	<b>Paragraph 7.15:</b> With regard to the Granville/Carlton site specifically the SPD says in 7.15 ".Much of the premises are however vacant after Council services have contracted or relocated" Again at Sec 12 p.132 the buildings are "currently under-utilised". This is the main justification for drastically changing these buildings. Noise problems are the current justification for not allowing people to use The Granville Plus Centre even though numerous ways of working this out have been advanced with no movement from the Council. Again this justification is false as the Council refuses to allow the buildings to be used fully. This in turn perpetuates the culture of distrust. It seems the Council do not want to solve this problem because it suits their interests to have an excuse to change the buildings from their present uses. Under Principle CF1 item 3 says Regeneration of the Carlton and Granville Centres into an Enterprise Hub, Education/Community Space and Housing; and again at Sec 12 p 132. It says "Non-residential floorspace unquantified as yet and 40 dwellings" on the Granville/Carlton sites The word housing occurs. Where has this come from? When has housing been mentioned as being part of the plan for community facilities or on the site of community facilities?
Officer Response	The Council as part of its wider property portfolio management has to ensure that its assets are optimally used and fit for purpose. In the case of the Carlton and Granville Centres it is clear that this has not been the case. As part of moving forward with the repurposing of these buildings the Council undertook a consultation event as part of the wider masterplan work. At this the provision of housing as part of the potential package of development was put forward and received much positive feedback, particularly in helping to meet local affordable needs. This is recognised in the 2016 and 2017 Cabinet reports related to the Carlton and Granville's regeneration as an enterprise hub. It was considered appropriate to include a proportion of residential within the development principles for the site to allow greater flexibility to, for instance, make efficient use of the site and as potential enabling development. This is not fixed, it could be more or less, and depending what comes out of the project design moving forward. The principal driver for the regeneration of the premises is as a community building and enterprise hub.
Recommendation	No change
Respondent	South Kilburn Trust
Response	<b>Paragraph 7.16 –</b> states the Council will 'envisage' working with the South Kilburn Trust. Brent WILL be working with the Trust, the funding from the GLA depends on it and Cabinet are fully behind this. This needs to be reflected in the

Chapter 7 Community and Other Facilities	
	SPD.
Officer Response	Now that the funding has been agreed by the GLA the document can be updated.
Recommendation	<b>Paragraph 7.16:</b> change sentences to "Greater London Authority funding has been agreed, subject to various approvals, for Phase 1 of this enterprise hub. The Council will work with the South Kilburn Trust who we envisage will manage the enterprise facility"
Respondent	South Kilburn Trust
Response	With the increase in new homes, what is the impact on school spaces, both primary and secondary? Can the infrastructure cope? There may be a new primary school planned, but with extra spaces? And what about the secondary schools of which there is not one in South Kilburn.
Officer Response	The revised masterplan dwellings numbers have been forwarded to the Council's education planning team. The proposed additional form of entry in the primary schools will be sufficient to meet needs. The Council is working with the Education Funding Agency and school providers to identify appropriate sites for additional secondary schools elsewhere in the Borough.
Recommendation	No change
Respondent	South Kilburn Trust
Response	How will the GPs cope with extra demand BEFORE the new Health Centre opens? Already one centre has had to consider closing access to its services new people, so where will new residents go?
Officer Response	The Council will be working with the CCG to ensure as early delivery as possible of the Peel scheme to ensure that sufficient capacity exists in the area wherever possible.
Recommendation	No change
Respondent	South Kilburn Trust
Response	About 25% of a population of 7000 are young people, and this may increase. Yet youth services have been cut left right and centre. What plans are there to ensure there is good quality indoor space and facilities for young people, and for young people who do not have access to much money from their families to spend on activities that cost? The consultation lacked extensive consultation with young people, how will you understand and capture their needs? Keeping young people off the streets and engaged in positive activities is key to tackling problems around street crime and gangs.
Officer Response	The masterplan review team met with the South Kilburn Trust and sought to use their activities as a mechanism for getting feedback from the young. Unfortunately this did not generate the level of outputs that were expected. Notwithstanding this there were other events/mechanisms that provided the opportunity for young people to give responses, e.g. pop-up sessions and fayres which did get some feedback. The masterplan identifies the potential for amended/additional community facility spaces with the flexibility through better design/more usable space to provide

Chapter 7 Community and Other Facilities	
	opportunities for additional activities for young people. Some of these will be provided at low cost, or potentially free, but admittedly it is by no means certain that this will be the case due to wider public/third sector funding pressures. The South Kilburn Park is planned for an extensive upgrade which will provide opportunities for a wide range of young people to undertake free activities. As with the Woodhouse Urban Park, there will be extensive engagement with younger people in particular to ensure that these facilities best meet their needs.
Recommendation	No change
Respondent	South Kilburn Trust
Response	The reference to Moberly Sports Centre makes no reference to fees for local residents. If the centre is to be run by Westminster, we need to ensure Brent residents get the same rates as Westminster residents (who get it for less). The same has been applied to St Augustine's Sports Centre so there is a precedent.
Officer Response	The S106 obligation sets out that Brent residents will pay the same rates at the Moberly as they would in other Brent managed leisure centres, subject to this not being less than what Westminster residents would pay.
Recommendation	No change
Respondent	South Kilburn Trust
Response	The plans for the new Health Centre are great – but are the current GP practises fully on board with the plans, and does this meet their business plan needs, based on their funding, demands on their services etc.? The timetable for this has been pushed back and Brent Council needs to fully understand the impact this might have on the GP practises – what we don't want is a 'white elephant' of a new Health Centre but none of the GP practises actually move in.
Officer Response	The Council has worked closely with the local GP practices and liaised with Brent CCG to ensure that the premises meet their ambitions. As identified in the response to the CCG's representation, it is working to deliver the Peel development as soon as practicable. The Council will not proceed with the development of the size of centre proposed if it results in a vacant building/liability for the Council.
Recommendation	No change
Respondent	South Kilburn Trust
Response	There are references to South Kilburn Studios. South Kilburn Studios is a project of the South Kilburn Trust, and we recommend making reference to this as it creates confusion when people assume the Studios is its own organisation.
Officer Response	The Council accepts that this change would reduce this confusion.
Recommendation	In site specific Peel and site specific Carlton & Granville amend the SPD to "South Kilburn Studios ( <u>a project of the South Kilburn Trust</u> )".
Respondent	Thomas Harrison
Response	The Tin Church on Cambridge Avenue should be included in refurbishment plans. It is in desperate need of repair and making good, as it (and its grounds) are an eyesore.

<b>Chapter 7 Community and Other Facilities</b>	
Officer Response	The premises are currently in a process of undergoing improvement resultant of a successful Heritage Lottery Funding bid which the Council supported. Officers are in on-going communication with the owners of the premises about the support it can provide in its regeneration, e.g. assisting bids for funding to better safeguard its future.
Recommendation	No change.
Respondent	Sport England
Response	The South Kilburn urban park extension proposals provides an opportunity to partly address the deficit of playing pitches within the locality. The pitches provided should be informed by the Council's recently completed Playing Pitch Strategy (PPS) which provides a sound strategy to direct playing pitch provision within the Borough.
Officer Response	The study together with views from the Council's sports officers and the local community about their needs will help in defining the pitches provided.
Recommendation	No change
Respondent	Sport England
Response	The SPD should set out that the proposed increase in residential accommodation would have an impact on existing sporting provision by increasing demand and that developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as the PPS or an up to date Sports Facilities Strategy.
Officer Response	Where possible community facilities will be designed to a sufficient size and flexibility so that they can support physical activity, including sports. In terms of developments contributing towards meeting demand, contributions obtained through CIL will be used to support local infrastructure requirements.
Recommendation	No change

<b>Chapter 8 Transport &amp; Movement</b>	
Respondent	Ashleye Gunn
Response	There are some inconsistencies regarding the plans for Malvern Road: P16-7 1.21 Figure 5 Summary of opportunities in 2016 shows the section of Malvern Road from Perrin House to the junction with Carlton Vale as 'potential connection for pedestrians and cyclists only'. It also shows the section of Malvern Road from the Shirland Road junction to Perrin House as a 'potential key cycling route'. However p35 Figure 7 Enhanced Masterplan shows Malvern Road as a 'secondary street' from the Shirland Road junction to the Malvern Place junction, with only the section between Malvern Place and Carlton Vale a 'pedestrians and cycles only' route. Furthermore p84 8.3 clarifies that 'Primary and secondary streets play an important part in the movement of vehicular traffic within South Kilburn and

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	<p>the segregation of motorised vehicles, cycles and pedestrians should be considered.' So there appears to be a clear intention to significantly increase the traffic on Malvern Road. And Figure 13 on p82 makes it clear that there will be no 'segregation' of cyclists as there won't be a separate cycle lane.</p> <p>I have based this consultation response on the plan for Malvern Road as set out on p35, p84 and p82 of the SPD. This would have a significant negative impact on the residents of Malvern Road in terms of increased pollution, increased noise, and increased safety risks for cyclists and pedestrians – particularly children, and there will be hundreds of children attending the school. It would also reduce the chance of achieving the 'integration' with the surrounding areas that the SPD aims to achieve. The authors of the SPD seem to not to have taken into account the recent changes to Westminster Council's traffic management on Saltram Crescent (see points 6&amp;7 on p4 below) which impact their plans for through traffic on Malvern Road/Malvern Place.</p> <p>No evidence has been presented for why cars and other vehicles need to enter Malvern Road. The same is true as to why it would make South Kilburn a desirable and sustainable place to live. Point 1 of Principle T1 is inconsistent with what is being proposed for Malvern Road which is two way running.</p> <p>Why in transforming South Kilburn Open Space into 'into a Park that becomes a core feature of everyday use for the community, as well as a place for gathering, socialising or events' (p33 3.4.6) you would surround it on two of its three sides with busy traffic-filled roads. (Primary road – Carlton Vale, secondary road – Malvern Road), both of which will apparently be important in moving vehicles around the area. (p84 8.3))</p> <p>It is not clear whether Malvern Road is considered to be 'within the South Kilburn estate', and thus getting a 20mph speed limit, or outside it and thus presumably having a 30mph speed limit.</p>
Officer Response	<p>As set out in relation to an earlier response to Ashlaye Gunn, it is now not considered appropriate to move forward with what was proposed for Malvern Road/Malvern Place due to changes Westminster has undertaken on adjoining streets. As such no significant changes are now proposed to what currently exists on the highway network for these two streets. Figure 7 shows what were identified to be opportunities at the start of the masterplanning process. The trees within the highway which are of a substantial size and realistically have to be kept mean that provision of segregated cycle lanes are not possible. However, this is not regarded as a significant deterrent to its use by cyclists as for the most part it will be a lightly trafficked road. In relation to Secondary Streets, on reflection the wording used in relation to their role could be perceived as overplaying their role in traffic movement and requires amendment</p>
Recommendation	See other changes as set out in relation to amending the document to take account of essentially keeping Malvern Road and Malvern Place as is.

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	<b>Paragraph 8.3</b> Change: "Primary and secondary streets play an important part in the movement of vehicular traffic within through South Kilburn. Vehicle movement in secondary streets is principally related to that generated by South Kilburn residents and non-residential uses. In both cases for and the segregation of motorised vehicles, cycles and pedestrians should be considered."
Respondent	Transport for London
Response	<p><b>Paragraph 8.2</b> Welcome efforts to improve the pedestrian and cycle environment to encourage greater movement by these modes.</p> <p><b>Paragraph 8.3</b> Reference should be made to the Healthy Streets framework.</p>
Officer Response	Noted. It is considered that a link to TfL's Healthy Streets document is appropriate.
Recommendation	<b>Paragraph 8.3:</b> Add weblink <a href="http://content.tfl.gov.uk/healthy-streets-for-london.pdf">http://content.tfl.gov.uk/healthy-streets-for-london.pdf</a> to this paragraph.
Respondent	Transport for London
Response	<p><b>Paragraph 8.5.</b> One scheme that can benefit both the EVCP and car club aspects within the report is the Go Ultra Low City Scheme (GULCS) of which £13m of funds are available in London. The GULCS project aims to deliver these residential and car club charging networks to London boroughs, and this funding will be able to be used to fund the installation of charge points.</p>
Officer Response	Noted, amend paragraph 8.5 to take account of potential funding streams.
Recommendation	<b>Paragraph 8.5</b> Add to the beginning of the second sentence. "Sources of funding might be available to assist in the delivery of this infrastructure however, where necessary contributions to the extension of these schemes into South Kilburn will be secured from Section 106 Planning Obligations."
Respondent	Transport for London
Response	TfL acknowledge the desire to secure funding for cycle hire stations from development via s106 funding. There are no immediate plans, nor funding, to extend to South Kilburn although it is requested that land and funding is safeguarded. 4-5 docking stations would be required to extend TfL's cycle hire scheme to South Kilburn from St. John's Wood, and approximately 6-8 sites to cover the land plots creating a viable network. This funding would be sought via s106 agreements. Cost per cycle hire station is £220,000: £110,000 capital costs/£110,000 operational costs for three years.
Officer Response	The response clarifies and reflects previous discussions held with TfL which were taken into account when the SPD was drafted.
Recommendation	No change.
Respondent	Transport for London
Response	<p><b>Principle T1 Transportation and Movement</b></p> <p>Clarification is sought on what kind of development constitutes 'major blocks'. TfL research shows direct links between good public transport access and increased economic vibrancy, particularly footfall in shops to neighbourhoods. Reliable</p>

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	bus services in terms of frequency and journey time within short of key amenities etc. are therefore necessary. The current proposal for Carlton Lane/Kilburn Lane of carriageway narrowing and planned pedestrian crossings would impact bus service reliability to the wider area of LB Brent if there is no protection for buses. The services have significant patronage and should not suffer detriment. TfL Buses would seek costs including funding from developments towards any possible impact on buses.
Officer Response	Major blocks are essentially the development parcels identified in the SPD. Major developments (which is defined in relation to planning applications – 10 or more dwellings, 1000+ sq/m/ of floorspace) would probably be a clearer term to use. As the Council wishes to ensure that bus services remain attractive to the existing and proposed population and works on bus routes require consultation/agreement with TfL works to the routes any changes to the highway network will clearly take account of bus services. In terms of impacts on TfL costs, requirements for funding, it is recognised that contributions will be required where a robust and reasonable case can be put forward by TfL.
Recommendation	<b>Principle T1 Transportation and Movement:</b> change “Applicants for major blocks development will be expected to propose and agree the design of works to the highway to improve the pedestrian and cyclist experience and safety incorporating quality materials and trees.”
Respondent	Transport for London
Response	<b>Parking Standards, Paragraph 8.6</b> Welcome potential for car-free development and low parking provision in light of high levels of public transport accessibility and existing CPZ coverage. Blue Badge parking and wheelchair accessible housing should comply with the London Plan.
Officer Response	Developments will provide parking in accordance with the London Plan
Recommendation	No change.
Respondent	Transport for London
Response	<b>Parking Standards, Paragraph 8.8</b> Clarification sought on ‘maintenance’ of car clubs. Most operators are well-established and self-maintaining. With respect to provision of car clubs in residential developments: if located in areas where cars wouldn’t be greatly used anyway it may lead to increased car usage and congestion.
Officer Response	It is agreed that the car club is now more mature, so is increasingly likely to be self-maintaining, particularly if the location/accessibility of the vehicles meets providers expectations on patronage. If this can be shown to be the case by an applicant, then the need for S106 to deal with issue can be reviewed.
Recommendation	No change.
Respondent	Transport for London
Response	<b>Parking Standards, Paragraph 8.9</b> Car club operators do their own marketing and they also have their own incentives to join the car clubs, so this may not be necessary. Increased car usage should not be condoned through car club provision. The Council should investigate if some form of use of car clubs for business fleets trial could be developed.

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	The Council shall also determine whether BluePointLondon has identified suitable sites for electric charging infrastructure in the area. Alternatively, charge points could be installed from other operators or through the GULCS scheme where demand is likely to exist. Different charge point operator options should be considered. Disabled parking should be made into its own section.
Officer Response	S106 is only sought where it can be shown to be reasonable and necessary, if commercial operators remove the need for such contributions from developers then they won't be sought. Business fleet provision is unlikely to be feasible in South Kilburn as it is not a significant employment area. Opportunities for the provision of electrical charging points will be considered nearer the time of delivery. As disabled parking provision will be consistent with London Plan requirements it is not considered necessary to have a separate section.
Recommendation	No change.
Respondent	Transport for London
Response	<b>Parking Standards, Paragraph 8.10</b> May wish to state that cycle parking should meet the London Cycle Design Standards (LCDS).
Officer Response	This will be taken into account, but could be made clearer in the document.
Recommendation	<b>Paragraph 8.10</b> change: "The Council will continue to apply the London Plan cycle parking standards, both in terms of number of stands and location/quality of provision consistent with the London Cycle Design Standards."
Respondent	Transport for London
Response	<b>Principle T2 Parking</b> Welcomed with regard to the support for both car free developments and those with a low parking provision. However, the Council should take a careful, restraint-based approach to the provision of off-street parking. TfL support the London Plan standards to include EV chargers in at least 20% of spaces. A reminder that there is also a requirement to include "passive" provision of EV chargers in an additional 20% of spaces, meaning that 20% of spaces should be equipped for the immediate installation of charge points if the demand exists.
Officer Response	The Council is seeking to ensure that minimum provision of off-street is provided, taking account of existing provision that exists. The 20% immediate provision is understood.
Recommendation	No change
Respondent	Thomas Harrison and Jason Jones (local residents)
Response	Having two Cambridge Roads is confusing, the southern one should be renamed to avoid confusion, or the two should be re-connected again as one.
Officer Response	The split is due to development which did not respect the line of the road. Whilst it is confusing, there is no prospect of the two parts of the road being reconnected in the foreseeable future.
Recommendation	No change
Respondent	Thomas Harrison

<b>Chapter 8 Transport &amp; Movement</b>	
Response	Canterbury Road should become an open through road again linking Kilburn High Road through to Carlton Vale. In addition Malvern Road should be re-opened to traffic at the junction with Carlton Vale
Officer Response	This is not considered either desirable or necessary in terms of vehicular movement as these changes would have the potential to increase rat-running and non-local traffic through the estate. However, well overlooked links that promote the prioritisation of pedestrian and cyclists along the routes are proposed.
Recommendation	No change
Respondent	Thomas Harrison
Response	Little is being proposed to improve / reinstate lost roads, especially roads which crossed Carlton Vale linking north and south sections South Kilburn to each other, such as the former Peel Road, Percy Road and Cambridge Road. Consequently, both sides of South Kilburn will remain unconnected and divided from each other - a situation which will be worsened by having taller buildings on the north side of Carlton Vale.
Officer Response	It has to be recognised that Carlton Vale is a priority bus route and relatively heavily trafficked road. This limits the extent to which interventions along its length can be implemented. As such it is proposed to improve priority links between the north and south to encourage such movement where there is the pedestrian/cycle frequencies support this.
Recommendation	No change
Respondent	South Kilburn Trust
Response	With the increase in new homes, how will the public transport system be impacted and are there improvements that can be made? For example the mainline train through Queens Park and Kilburn high Road only has 3 trains an hour. It would be great to see the Boris bikes in South Kilburn.
Officer Response	The Council does and will continue to work with organisations such as TfL and Network Rail to consider and promote public transport provision in the area and wider Brent. Where appropriate it will seek developer S106 obligation contributions to off-set the specific impacts of a development.
Recommendation	No change
Respondent	Simon Wookey (Resident Malvern Mews)
Response	There is opportunity to seek better connectivity to Euston by lobbying TFL to increase overground service from Queens Park and Kilburn into Euston, also to connect to the east by running trains through Camden and on to Stratford.
Officer Response	The Council does and will continue to work with organisations such as TfL and Network Rail to consider and promote public transport provision in the area and wider Brent. Where appropriate it will seek developer S106 obligation contributions to off-set the specific impacts of a development.
Recommendation	No change

Chapter 9 Green Infrastructure	
Respondent	Natural England
Response	<p>Encouraged by commitment to connected green infrastructure. Open green space, wild green space and green infrastructure can all be used to create connected habitat suitable for species adaptation to climate change. An accompanying Annex to the response provides examples of Green Infrastructure.</p> <p>Suggest requiring the use of a biodiversity metric or calculator by developers to demonstrate that they have provided an increase in biodiversity as set out in an accompanying annex submitted to the response.</p>
Officer Response	It is considered that some reference to bio-diversity measures can be made to ensure developers are clear how applications will be assessed.
Recommendation	<b>Paragraph 9.10</b> Add a sentence: “ <u>Improvements to biodiversity can be shown through using tools such as the Envirobank Impact Calculator: <a href="http://www.environmentbank.com/impact-calculator.php">http://www.environmentbank.com/impact-calculator.php</a></u> ”
Respondent	Environment Agency
Response	South Kilburn Urban Park (Page 96) Positive to see the proposed improvements. The integration of a ‘soft SuDS’ scheme such as swales and ponds, or a rainwater garden which could become a community project, into the improvements may be a possible. This would provide additional sustainability, biodiversity and water quality benefits, potentially providing an educational and engagement opportunity for the local community.
Officer Response	Agreed, however the existing wording provides sufficient flexibility to provide these types of features if they are considered appropriate.
Recommendation	No change
Respondent	Environment Agency
Response	Green Infrastructure on Development Sites (Page 100). Positive to see the identification of multiple benefits of green infrastructure and the range of options listed within the supporting text (9.7). Encourage cross reference to the Sustainability Section, specifically Surface Water Run-off detailing the inclusions of SuDS schemes. This could be another avenue of delivering increasing green infrastructure whilst providing additional benefits relating to improving water quality, reducing and slowing surface water run-off and increasing biodiversity.
Officer Response	Agreed, this could be better cross-referenced.
Recommendation	<b>Paragraph 9.7</b> Add to last sentence: “This can relate to both incidental planting, and that provided in association with required on site amenity space for residents, <u>plus other features such as Sustainable Urban Drainage Solutions as sought in Chapter 10 Sustainability.</u> ”
Respondent	Thomas Harrison
Response	More street trees should be provided in all roads – especially outside all new developments to soften landscape and

<b>Chapter 9 Green Infrastructure</b>	
	harsh structure of new buildings, which aren't really very nice to look at from the outside, are quite bland and have few features of architectural interest or merit.
Officer Response	Wherever possible street trees will be added, taking account of the need for safe visibility distances for vehicles and pedestrians, amenity of adjoining land uses and also the servicing/infrastructure under the pavement surfaces
Recommendation	No change.
Respondent	David Walton resident Malvern Road
Response	<b>Page 95/ Figure 16.</b> The school grounds of Carlton Vale Infants School, Malvern Road are not included on this plan as they should be.
Officer Response	Agreed.
Recommendation	<b>Figure 16:</b> Amend to include grounds of Carlton Vale Infants School as school grounds open space.
Respondent	Simon Wookey (Resident Malvern Mews)
Response	Realism is needed in relation to long term maintenance funding for new parks and public realm improvements. A site specific service charge or dedicated funds from CIL or section 106 need to be investigated.
Officer Response	Agreed, this is being undertaken and further opportunities for improving this, for example through the use of ground rents where the Council remains the freeholder will be pursued by the South Kilburn estate regeneration team.
Recommendation	No change

<b>Chapter 10 Sustainability</b>	
Respondent	Thames Water
Response	The increase in the number of properties proposed within the area will put greater pressure on the water and wastewater infrastructure which can assist with reducing the impact of development on existing infrastructure. We support the content of Section 10.7 regarding SuDS and 10.8 regarding water consumption. Opportunities for SuDS should be maximised. Surface water connections to combined sewers should be avoided. It is essential that the development within the South Kilburn area is delivered alongside any infrastructure necessary to support the development including water and wastewater infrastructure. In line with Policy DMP1 and Section 2.7 of the Development Management Policies DPD development will be expected to provide any associated infrastructure required to make it acceptable including water and sewerage infrastructure. Developers should be required to demonstrate how any necessary upgrades to water and/or wastewater infrastructure required to support their developments demonstrate will be delivered ahead of the occupation of development. Developers are advised to contact Thames Water as early as possible to discuss the water and wastewater infrastructure requirements for their developments to establish the following:

Chapter 10 Sustainability	
	<ul style="list-style-type: none"> <li>• The development's demand for water supply infrastructure both on and off site and can it be met;</li> <li>• The development's demand for wastewater infrastructure both on and off site and can it be met; and</li> <li>• The surface water drainage requirements and flood risk of the development both on and off site and can it be met.</li> </ul> <p>To avoid potential delays developers are advised to contact Thames Water as early as possible to discuss water and drainage requirements associated with any development to ensure that any development proposals are aligned with infrastructure requirements.</p>
Officer Response	Noted, reference to contacting Thames Water is considered appropriate to reduce the potential for delays.
Recommendation	<b>Paragraph 10.8.</b> Add a sentence. “Developers are recommended to discuss with Thames Water their water infrastructure needs early on in the development of plans for their sites.”
Respondent	Environment Agency
Response	<b>Paragraph 10.2</b> Positive to see inclusions of targets for water efficiency and carbon dioxide reduction within the sustainability plan. However, these are frequently considered in isolation, when the two are linked, e.g. increased water use requires increased power for heating water used and getting it to the property and its treatment before and after. Simple demand management measures, particularly those that reduce hot water use, have significant potential to save water and energy, and reduce the carbon footprint throughout the water system. We encourage you to highlight the mutual benefits that improving resource efficiency can have on reducing carbon dioxide emissions, these can be cross referenced and integrated throughout this section.
Officer Response	This is accepted, but there is the potential for too much repetition throughout the document. However, it could be given greater prevalence in the lean section.
Recommendation	<b>Paragraph 10.2:</b> Add new second sentence: “For example reducing water use through efficiency measures as set out later in this section will have a dramatic impact on a development’s energy requirements.”
Respondent	Environment Agency
Response	<b>Paragraph 10.4</b> Reference to Core Strategy Policy CP19 relating to a BREEAM excellent rating for non-residential developments is positive. We would encourage the South Kilburn SPD to expand their supporting text to include a requirement for a BREEAM ‘excellent’ rating for water efficiency, increasing the priority of water efficiency for commercial developments. We also like to highlight BREEAM Refurbishment for Domestic and Non-Domestic Buildings assessments suitable for refurbishing domestic dwellings, domestic conversions or non-domestic buildings. We would encourage the South Kilburn SPD to include this within their 10.4 supporting text, requiring refurbishments to achieve an ‘excellent’ rating for water efficiency. This can also be cross referenced or highlighted within the Water Consumption section to provide further support relating to retrofitting existing buildings.

<b>Chapter 10 Sustainability</b>	
Officer Response	A requirement for BREEAM excellent for water consumption in domestic properties is not considered appropriate as it goes beyond existing policy and also government has indicated that water usage standards for domestic properties are the remit of building regulations. However, encouragement of BREEAM use is considered appropriate for inclusion due to its overall likelihood of increasing the sustainability of any refurbishment plans if used.
Recommendation	<b>Paragraph 10.4:</b> Add new last sentence: " <u>BREEAM also produce assessment accreditation for domestic and non-domestic refurbishment and a similar attainment of excellent for this types of work is encouraged.</u> "
Respondent	Environment Agency
Response	Surface Water Run-off. The inclusion of SuDS schemes within the Surface Water Run-off policy, identifying and highlighting the multiple benefits possible is positive. It is recommended that South Kilburn cross reference to Section 9 Green Infrastructure, and specifically Green Infrastructure on Development Sites. SuDS schemes can require a long term maintenance strategy to be implemented which should be set out in supporting text. While the area does not fall within any Critical Drainage Areas, as defined by the Drain London Project. Figure 1 shows the extent of Surface Water Flood Risk during a 1 in 30 year storm event. There are significant areas at risk, and we therefore recommend that you consider this when allocating sites for development. Surface water flood modelling can be requested from <a href="mailto:HNLenquiries@environment-agency.gov.uk">HNLenquiries@environment-agency.gov.uk</a> .
Officer Response	The SPD does not allocate sites for development. Strategic Flood Risk Assessments Levels 1 & 2 will be used in the Local Plan allocation process. Consideration of risks from surface water drainage will occur where appropriate at application stage for development sites.
Recommendation	No change
Respondent	Environment Agency
Response	Water Consumption: Positive to see a section specific on this. A statement requiring developments to retrofit existing buildings to increase their water efficiency should be included, as these are the least energy and water efficient. This would be in accordance of Policy 5.4 of the London Plan, and would contribute to the "Lean" and "Clean" principles the South Kilburn SPG is aiming for. Request addition of 'Water Efficiency' principle incorporating the requirements and comments made in the Surface Water Run-off and Water Consumption sections (including water consumption targets, SuDS schemes retrofitting buildings, water efficiency ratings within BREEAM assessments and greywater harvesting).
Officer Response	Whilst the Mayor's policy does seek such retrofitting, where new development is meeting London Plan/building control efficiency standards it would not be reasonable to them make that development contribute to resolving existing issues as an 'offset' type payment. Limited capacity of supply or waste water infrastructure might mean such measures are needed, but this will be highlighted by Thames Water and will be for the applicant to address with that organisation. The addition of a principle in relation to water issues is considered appropriate.

<b>Chapter 10 Sustainability</b>	
Recommendation	<p><b>Principle E2:</b> Add after Paragraph 10.8 E2 Related to Water Management.</p> <p><u>"Principle E2: Water Management</u></p> <p><u>Effective water management will be sought through developments incorporating measures related to:</u></p> <ul style="list-style-type: none"> <li>• <u>reducing flood risk by effective control of water run-off through the incorporation of features such as greywater harvesting and SUDs which will also where possible meet other objectives associated with bio-diversity, green infrastructure and place-making, with the necessary long-term management schemes</u></li> <li>• <u>reducing the demand for water plus its associated energy requirements through meeting efficiency targets in new and wherever possible existing refurbished premises."</u></li> </ul>

<b>Chapter 11 Implementation</b>	
Respondent	David Walton resident Malvern Road
Response	<p><b>Page 113/ paragraph 11.3</b> The reference to the Council prioritising use of S106 agreements and Community Infrastructure Levy funds generated within the growth area to be spent locally needs to be changed to 'on the estate'. Locally legally means spending it elsewhere in Brent. Given the vulnerable brownfield status of all community shared assets and lives in South Kilburn at present, it is unjust that major estate public open space, public square and facilities investments are not made now in 2017 with these extensive funds.</p>
Officer Response	The Council has no agenda in terms of spending the development funds elsewhere. Locally provides sufficient flexibility and reflects that the growth area is wider than the South Kilburn Estate. Whilst it is anticipated most spend will be within the estate, there are facilities/infrastructure improvements that might well benefit the estate but be located outside its boundaries.
Recommendation	No change

<b>Chapter 12 Site Specific Proposals</b>	
Respondent	Environment Agency
Response	<p>The overall area of South Kilburn is approximately 650m from the Grand Union Canal (from Uxbridge to Hanwell Locks, Slough Arm and Paddington Arm; Water Framework Directive ID: GB70610075) at the closest point. Therefore, there are no specific concerns regarding any of the site allocations from a fluvial flood risk or Water Framework Directive perspective. Encourage the developers to consider sewage network capacity and begin discussions early with the relevant water company. There is a need to ensure there is no deterioration of the</p>

<b>Chapter 12 Site Specific Proposals</b>	
	Grand Union Canal, therefore, the developers need to ensure that any new buildings are appropriately connected to the sewer network to ensure no issues arise through misconnections, discharging sewage into water courses. Misconnections are a major cause of pollution to the river environment.
Officer Response	Noted. It is proposed to change the SPD in response to the request for developers to address the need to engage with Thames Water early on in the development process. The connections issue is a building control matter. Most misconnections are the result of historic illegal changes, or failures in separated systems.
Recommendation	No change
Respondent	Thomas Harrison and TfL Commercial Development Planning Team
Response	Kilburn Park Underground Station and land to the rear: This hasn't been identified and could accommodate additional dwellings.
Officer Response	No feasibility work has been undertaken which shows the potential development capacity at this site taking into account the need to preserve and enhance the heritage asset. Nevertheless, officers consider that there is the potential for development on top of the station if designed well as most of these stations were intended to take development on top at some future date. Subject to suitable wording to ensure that the new development must preserve the character and integrity as a building of special architectural or historic interest as well as the conservation area.
Recommendation	<p><b>Section 12: Longer Term Opportunity Sites.</b> Add:</p> <p><b><u>"Kilburn Park Underground Station</u></b></p> <p><b><u>Address:</u></b> Cambridge Avenue</p> <p><b><u>Area:</u></b> 0.09 ha</p> <p><b><u>Policy Context:</u></b> Core Strategy policy CP9</p> <p><b><u>Planning History:</u></b> N/A</p> <p><b><u>Potential:</u></b> Mixed tenure residential development, incorporating existing station building.</p> <p><b><u>Indicative development capacity:</u></b> Unknown</p> <p><b><u>Delivery:</u></b> 2022-2027</p> <p><b><u>Description:</u></b> Currently the site is a Grade 2 Listed Underground station. The building dates from 1914-15, probably by Stanley Heaps, but retaining the distinctive house style established by his predecessor Leslie Green for the London Electric Railway. It has a distinctive red glazed faience exterior to Cambridge Avenue and part of Alpha Place, with other fine detail associated with stations of this house style of this time, although this is a particularly sophisticated and lavish example. The interior's original features are for the most part well preserved and include a tiled entrance hall, the escalators are covered by an oval glazed dome, with higher</p>

## Chapter 12 Site Specific Proposals

	<p><u>central light, leading to lower escalator hall and platforms. The ground floor to Cambridge Avenue includes a pharmacy use whose frontage has recently been improved so that it is more sympathetic to the overall composition of the façade than previously.</u></p> <p><b>Justification:</b> The premises have been identified by TfL as a development opportunity, given the station's high public transport accessibility rating and its single storey configuration in an area of prevailing 3-4 storey historic character. Most of these stations were intended to take development on top, so subject to the new development being able to demonstrate preserving the character and integrity of a building of special architectural or historic interest as well as the conservation area, the principle of development is likely to be considered acceptable.</p> <p><b>Design principles:</b> Subject to primarily preserving the character and integrity as a building of special architectural or historic interest as well as the conservation area, development of between 3-4 storeys would fit the existing surrounding context. Alpha Place to the side and rear and would benefit from some active frontages/overlooking as would Bristol Walk on the north eastern frontage.”</p>
Respondent	Thomas Harrison, Jason Jones
Response	Carlton & Granville Centres: should be kept as is. They are buildings of historical and architectural significance that form an important link to the past and have a vital role in providing education and community activities in the future too. These buildings should be retained as an asset of community value.
Officer Response	The SPD recognises the community function of the buildings and their historical significance and as such provides sufficient guidance on how these buildings could be developed in the future. A significant community element shall remain and the total loss of building fabric is not advocated, but will be allowed if the merit of its replacement is such that it justifies it. This is a fair reflection of its historic significance.
Recommendation	No change
Respondent	Thomas Harrison
Response	West Kilburn Baptist Church: wonderful and only surviving building of any architectural interest in this location that should not be lost. It provides essential community and worship facilities, which should be kept as an asset of community value.
Officer Response	The SPD recognises the community function of the buildings and their historical significance and as such provides sufficient guidance on how these buildings could be developed in the future. A significant community element shall remain and the total of building fabric is not advocated, but will be allowed if the merit of its replacement is such that it justifies it. This is a fair reflection of its historic significance.
Recommendation	No change
Respondent	Thomas Harrison

<b>Chapter 12 Site Specific Proposals</b>	
Response	Queen's Park & Cullen House: Falcon Public House should be retained as an asset of community value.
Officer Response	The site has planning permission for redevelopment which has commenced, so the public house will not be retained.
Recommendation	No change
Respondent	Thomas Harrison
Response	Canterbury Court, Gorefield House and Alpha Place flats: Should all be demolished and replaced with better quality housing – all lower in height.
Officer Response	The occupants of these blocks voted to not be subject to demolition/reprovision as part of the original New Deals for Communities scheme. The consultation on the revised masterplan indicated no desire from these blocks for change now. As such there are no current plans to demolish these blocks, although improvements to the public realm in their vicinity are proposed.
Recommendation	No change
Respondent	Thomas Harrison
Response	Royal Mail sorting Office in Canterbury Road: High density housing should be provided on-top of this.
Officer Response	The SPD identifies that residential development on this site is acceptable in principle.
Recommendation	No change
Respondent	Thomas Harrison
Response	St. Augustine's Sports Centre: Residential should be provided on-top– up to surrounding buildings heights in Cambridge Gardens.
Officer Response	Although this might well be an opportunity site, given the age of the premises this is not considered to be realistic in the short to medium term and Westminster have not indicated that it will become available in the longer term. As such it is not considered appropriate to identify it as such.
	No change proposed.
Respondent	Simon Wookey (Resident Malvern Mews)
Response	John Radcliffe site. There is an opportunity to deliver more housing and a better site for John Radcliffe if only the site would include the buildings facing onto Shirland Road. There is a need to work with neighbouring boroughs to maximise potential.
Officer Response	The Council has taken a pro-active approach in relation to all the sites within the South Kilburn boundary and where necessary approached relevant landowners/other organisations that could assist in delivering the SPD's vision. Westminster Council has been approached about this particular site/environs and discussions are on-going about the potential to create a more comprehensive site.
Recommendation	No change
Respondent	Thomas Harrison and Jason Jones

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Response	The buildings proposed on the Exeter Court / Cambridge Road location and Hereford Court are far too high, will over-dominate the area and should be of similar height to other buildings in the area – namely 4 or 5 floors high. Brent appears to have introduced a new policy of providing tall buildings in Carlton Vale where the impact tall buildings has less effect on its surroundings – however these proposed two towers are in Cambridge Road and therefore not suitable in such a road in any way. The development should take account of the 8 storey Energy Centre flue associated with Durham & Gloucester which is an air quality risk to potential residents
Officer Response	The masterplan review has been undertaken by experienced architects taking account of London Plan, Brent Local Plan and the site's characteristics. The block nature of the existing massing drawings which are purposely devoid of detail can perhaps sometimes provide a crude understanding of impacts. Taking into account the comments received, the relationship of the proposals with the local statutory and non-statutory heritage assets has been revisited. Whilst the principle of such heights if sufficient quality exists is exhibited in the final design of the buildings is considered not to harm these heritage assets (buildings and conservation area), the detailing and methods of reducing massing impact on the perception of bulk will be important in ensuring the setting of heritage assets is preserved or enhanced. A solution akin to the architecture of the blocks that will be removed for instance would not be viewed positively. In all cases impacts will require further testing/justification at the planning application stage as evidenced in a Design and Access statement, plus other associated technical studies (if necessary air quality) to support the solution proposed. Nevertheless, it is accepted that the wording of the document could be amended to make it clearer that in the case of some blocks, greater evidence/a more sympathetic solution will be required in relation to preserving and enhancing the setting of heritage assets.
Recommendation	<b>Section 12: Hereford House and Exeter Court</b> Design Principles: Add last sentence: " <u>The scale height, massing, design and detailing of the proposed buildings should be such that they do not undermine the need to preserve and enhance the settings of adjoining heritage assets.</u> "
Respondent	Thomas Harrison, Simon Wookey (Resident Malvern Mews)
Response	The Radburn layout houses should all be replaced with better quality and higher density housing with a better road layout as the current set-up of poor quality housing is maze-like and does not feel a safe environment to walk through as there is no clear path /roads between the houses and no sightlines that penetrate the area, which makes way-finding difficult. In addition the late 20th century Genesis HA site on Carlton Vale feels out of place in terms of density within a central London location.
Officer Response	It is agreed that in the context of the development delivered to date and that planned and in relation to the London Plan density matrix that some areas could currently be considered as not using land most efficiently and are poor in relation to urban design. The Council has sought to discuss with the owners of numerous sites the potential for their regeneration. Those that have reacted more positively, or where there are currently no residential properties have been identified in the SPD as opportunity sites. If the Council is approached by the owners of blocks of residential

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	properties it is likely to look on regeneration positively consistent with policy CP9. Without a commitment from the owners for change however, identifying residential properties in particular as a redevelopment opportunity when it is not clear if it will be delivered could have significant consequences. In particular, it has the potential to cause significant blight due to the uncertainty that it would bring particularly to people selling/buying property. As such the Council has adopted a cautious approach to identifying potential sites in the area.
Recommendation	No change.
Respondent	Leslie Barson and Dee Woods: Representing Users of The Granville Plus Centre and The Carlton Centre
Response	The diagram for Carlton and Granville shows no new information or more accurately it seems to show the buildings that are there now. Does this mean the Council intends to keep and refurbish these buildings? If so why is this not stated as a possibility in the written paragraph?
Officer Response	The Council used the existing buildings diagram because it did not want to be accused of having already decided what the development should be like. A process of engagement in taking forward the solution for the centre will occur which will result in a planning application, the form of which is as yet unknown in relation to the extent of the existing buildings that will be proposed for retention. The Council has provided sufficient flexibility for a range of solutions on the site from essentially retaining almost all, to replacing all the buildings, provided sufficient justification is submitted for the proposed solution in association with any planning application related to the accommodation of community uses and the fabric of the existing building. However, to provide clarity on what the massing drawing show, the document can be amended to state it shows the existing buildings.
Recommendation	<b>Carlton and Granville Design Principles</b> amend “(see Figure 26 which shows the existing massing of the buildings in the context of what is proposed for the surrounding area). <b>Figure 26</b> Amend to: “Massing drawing of existing Carlton and Granville”
Respondent	Thames Water
Response	Unable to undertake an initial high level review of the allocations set out in Chapter 12 of the SPD in order to provide comments on any potential infrastructure concerns as there are no plans included showing the boundaries of each site. In order to progress an initial review of the infrastructure requirements Thames Water request that plans including site boundaries are provided.
Officer Response	Each site is identified on a bird's eye plan, which should be sufficient to be able to understand its location, whilst the massing drawings should allow an understanding of its boundaries. However, to avoid confusion an OS map with a site boundary will be added to the document for each site.
Recommendation	<b>Add OS site boundaries</b> for the sites in Chapter 12.
Respondent	David Walton resident Malvern Road
Response	<b>Allocations: Page 156.</b> The OK Club proposal needs to be listed here as well as it is yet another over densification

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	impact to masterplan consider. The Vale only 20 year old housing up for demolition features in opportunity sites Page 8/ Figure 2 so why not detail it here? Again increases yet further the community asset cohesion value of central Kilburn Park (South Kilburn Public Open Space) adjacent and the Local Centre Public Square at Chippenham Gardens. Both need to be talked up as key community wellbeing features rather than put down as surplus land as the draft SKSPD Feb 2017 in part still does.
Officer Response	The Vale as identified in response to Thomas Harrison, Simon Wookey (Resident Malvern Mews) is not considered appropriate to be regarded as an opportunity site due to its age and the fact that it has not been identified by the Registered Provider as a redevelopment opportunity. It would however be considered if there was greater certainty from the landowner that it was available. Both Kilburn Park and Chippenham Gardens spaces will be improved. The loss of part of the existing Kilburn Park to accommodate the relocation of the schools is considered appropriate as it will provide a much better cohesive functional open space, with less potential for anti-social behaviour, rather than a disjointed/odd shaped solution that would otherwise remain. Quality and usability of space has to be a consideration of its public worth, as well as the volume. In relation to the OK Club, it is considered that the SPD should be amended to incorporate the potential of the site as the Oxford and Kilburn Youth Trust have discussed with the Council's regeneration team the options for its regeneration.
Recommendation	<p><b>Section 12 add:</b> "<u>OK Club</u></p> <p><b>Address:</b> The Oxford Kilburn (OK) Club Neville Road and Christian Holt House</p> <p><b>Area:</b> 0.2 ha</p> <p><b>Policy Context:</b> Core Strategy policy CP9</p> <p><b>Planning History:</b> N/A</p> <p><b>Potential:</b> Replacement/upgrading of existing community uses, plus mixed tenure residential development.</p> <p><b>Indicative development capacity:</b> Unknown</p> <p><b>Delivery 2022-2027</b></p> <p><b>Description:</b> The site is currently occupied by the Oxford and Kilburn Youth Trust, a charity that supports younger people in the area. The premises are a mixture of a three storey (1920's Neo-Georgian), two storey (1960s/70s) and single storey (1920s) buildings. These are used as administrative offices and also have a main single storey hall and other rooms for youth activities consistent with the provision of the services by the Trust. The site also contains a memorial wall and garden dedicated to Dylan Kirby.</p> <p><b>Justification:</b> The Trust has approached the Council regarding the potential of regeneration of the site to better support its activities in contemporary premises fit for sustaining the charity's long term purpose and improving outcomes for young people. Ideally the community use will remain on site with re-provision occurring in new buildings. Nevertheless in the context of planning policy, off-site re-provision may be possible, as long as it can be justified to show nil detriment in terms of meeting any local community needs compared to the existing premises.</p>

## Chapter 12 Site Specific Proposals

	<p>Although in the context of South Kilburn, some of the buildings are older than their surroundings, they are not considered to be of such historic or architectural significance that they should necessarily be retained if high quality replacements are proposed. The Dylan Kirby memorial is clearly well regarded by the local community and its sympathetic incorporation into any regeneration needs to be considered.</p> <p><b>Design principles:</b> A perimeter block on three sides that provides the community use on the ground/lower floors and has active frontages and a positive relationship with the adjacent highways of Denmark Road, Canterbury Road and Neville Road. Consideration should be given to limiting impacts on the development of the adjacent Crone and Zangwill site as set out in this SPD with a view to not undermining its identified development capacity. The heights of proposed buildings should be up to 6 storeys to reflect the scale of the street and in particular the other side Neville Road as proposed in the Peel development. Ideally the Dylan Kirby memorial wall should be kept in situ, or appropriately incorporated into the new building.”</p>
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## Other non-material changes considered appropriate to improve the document

These changes are not significant, nor seek to introduce issues not previously consulted upon, but will improve the clarity of the document. They also reflect its change in status from draft to adopted document.

Other non-significant changes considered appropriate to improve the document.	
Part of Document	Title Page: South Kilburn Growth Area Boundary
Issue	Amend to reflect change from draft to adoption.
Recommendation	<b>Title Page</b> change: “Draft South Kilburn Supplementary Planning Document February June 2017 Brent Council Regeneration and Growth Environment
Part of Document	Page I: Remove How to Give Your Views
Issue	Amend to reflect change from draft to adoption.
Recommendation	<b>Page I:</b> Delete all: How to Give Your Views
Part of Document	Page II
Issue	Amend to reflect change from draft to adoption.
Recommendation	<b>Page II:</b> “Draft South Kilburn Supplementary Planning Document 2017, Brent Council Draft published in February Adopted June 2017”
Part of Document	Page III

<b>Other non-significant changes considered appropriate to improve the document.</b>	
Issue	Amend to reflect change from draft to adoption.
Recommendation	<b>Page III:</b> “Draft South Kilburn Supplementary Planning Document” Footer throughout document “February June 2017 Brent Council Regeneration and Growth Environment”
Part of Document	Page V
Issue	Amend to reflect change from draft to adoption.
Recommendation	<b>Page V:</b> Header “Draft South Kilburn Supplementary Planning Document” Contents: “Purpose of the Draft South Kilburn Supplementary Planning Document”
Part of Document	Page 1 Title Page
Issue	Amend to reflect change from draft to adoption.
Recommendation	<b>Page 1 Title Page:</b> “Purpose of the Draft South Kilburn Supplementary Planning Document”
Part of Document	Page 2 Heading:
Issue	Amend to reflect change from draft to adoption.
Recommendation	<b>Page 2 Heading:</b> “Purpose of the Draft South Kilburn Supplementary Planning Document”
Part of Document	Paragraph 1.1
Issue	Amend to reflect change from draft to adoption.
Recommendation	<b>Paragraph 1.1</b> Delete All and existing Paragraph 1.2 to become Paragraph 1.1
Part of Document	Paragraph 1.2
Issue	Amend to reflect change from draft to adoption.
Recommendation	<b>Paragraph 1.2 add new paragraph:</b> “The Council is committed to full community involvement in the important decisions that are made and particularly in bringing forward plans that are likely to affect the local community. There has been widespread consultation and community involvement in the development of the 2016 Masterplan and also in the adoption process of this SPD. The Council will continue to engage with the local community on the individual elements of regeneration set out in this document and other changes that are proposed.”
Part of Document	Chapter 1 Introduction: South Kilburn Growth Area Boundary
Issue	The diagram replicates the key diagram for the area set out in the Core Strategy. Some the features are now in the wrong place due to the passage of time and delivery of sites that has occurred. It is considered better to include only the outline of the growth area to overcome this potential confusion.
Recommendation	<b>South Kilburn Growth Area Boundary:</b> Show only the boundary of the growth area.
Part of Document	Chapter 1 Introduction: South Kilburn Growth Area Boundary
Issue	The Figure replicates the key diagram for the area set out in the Core Strategy. Some the features are now in the wrong place due to the passage of time and delivery of sites that has occurred. It is considered better to include only the outline of the growth area to overcome this potential confusion.

<b>Other non-significant changes considered appropriate to improve the document.</b>	
Recommendation	<b>South Kilburn Growth Area Boundary:</b> Identify as Figure 1 and show only the boundary of the growth area.
Part of Document	Chapter 1 Introduction: Figure 3
Issue	Figure 3 can be updated to 2017.
Recommendation	<b>Update Figure 3 to 2017.</b>
Part of Document	Paragraph 1.6
Issue	Amend to reflect change from draft to adoption.
Recommendation	<b>Paragraph 1.6:</b> “On adoption it will be became a significant material consideration in the determination of planning applications. A Sustainability Appraisal (SA) is was not required for the SPD as one was carried out for the Council’s Core Strategy and Site Allocations Plan which identified the boundary of the growth area and its status as an area for comprehensive regeneration.”
Part of Document	Paragraph 1.9
Issue	Typo.
Recommendation	<b>Paragraph 1.9:</b> “It has developed this housing at rents affordable to existing tenants, known as (social rent).”
Part of Document	Paragraph 1.14
Issue	Amend to reflect change from draft to adoption.
Recommendation	<b>Paragraph 1.14</b> “The status of the contents of the revised South Kilburn Masterplan in relation to planning decisions needed to be clarified by the Council in its role as local planning authority. This will provide greater certainty and confidence to all about how the area will continue to be regenerated in the future. Consequently, taking account of the factors highlighted above and the revised Masterplan the Council is taking forward has adopted a new South Kilburn SPD. This will look seeks to incorporate those elements of the revised Masterplan which are planning related and which, as a local planning authority, the Council considers are appropriate.”
Part of Document	Figure 5
Issue	Amend to reflect 2017.
Recommendation	<b>Figure 5</b> change: “Summary of opportunities 20167”
Part of Document	Chapter 3 Paragraph 3.8
Issue	Difference in names of character areas compared to Figure 10 identifies Civic Quarter.
Recommendation	<b>Paragraph 3.8:</b> Change “Civic Centre Quarter”, “The Boulevard Tree Lined Avenue”, “The Park Quarter”, “The Stitch Quarter”
Part of Document	Chapter 5 Design: Figure 12: Heritage Assets
Issue	Paragraph 5.13. The wording in relation to approval of materials could be clearer.
Recommendation	<b>Paragraph 5.13:</b> Change to: “Consistent with its desire to approving RIBA Stage 3+ drawings in association with planning permission, the Council will require the applicants to provide materials boards at the time of application. It will

<b>Other non-significant changes considered appropriate to improve the document.</b>	
	not expect that the choice of materials to <u>will be something that can be deferred and introduced for consideration at committed to a later date.</u> "
Issue	This Figure currently shows more than just Heritage Assets. For clarity's sake, it would benefit from solely focussing on Heritage Assets
Recommendation	<b>Figure 12:</b> Change so it focuses purely on Heritage Assets and quality graded A and B trees.
Part of Document	Chapter 6 Housing: Paragraph 6.4
Issue	The reference to Appendix 1 should be Appendix 2.
Recommendation	<b>Paragraph 6.4</b> change to: "A summary position on how the target will be achieved is set out in Appendix 4 <u>2</u> Housing Sites and Delivery Rates."
Part of Document	Chapter 6 Housing: Paragraph 6.5
Issue	The document addresses the Council's potential to seek provision of social rent over other affordable tenures on non-Council owned sites adjacent to the South Kilburn estate. The same would also be true of non-Council owned sites within the estate. As such it is considered necessary to amend the document to reflect this.
Recommendation	<b>Paragraph 6.5</b> change to: "On non-Council owned sites <u>within and adjacent</u> to the South Kilburn estate however, the Council may seek to prioritise social rent over other affordable tenures."
Part of Document	Chapter 6 Housing: Paragraph 6.8 reference to Appendix 1
Issue	This reference is wrong, it should be Appendix 2. It would also be beneficial to identify that the Appendix shows anticipated affordable dwelling delivery on each site.
Recommendation	<b>Paragraph 6.8</b> Change to: " <u>Appendix 4 2 which identifies the anticipated affordable housing delivery rates on each site</u> "
Part of Document	Chapter 6 Housing: Paragraph 6.15 reference to M4(3)
Issue	Provide clarity that the remaining 10% of dwellings not M4(2) will be required to be M4(3).
Recommendation	<b>Paragraph 6.15</b> Change to: "The Council will require <u>the remaining</u> 10% of new homes to be designed to be easily adaptable for wheelchair users achieving building regulation M4(3) pursuant to the London Plan Policy 3.8."
Part of Document	Chapter 6 Housing: Paragraph 6.17
Issue	The Local Plan residential amenity space standards apply across the Borough. The Local Plan recognises that in higher density areas this could be more difficult to achieve, but to site characteristics and cost. In South Kilburn because of the need to address no net-loss of social rent properties viability is challenging in terms of meeting the 50% affordable housing target. As such on occasions a balance will need to be struck between prioritising meeting affordable housing targets and amenity space targets. Whilst London Plan amenity space minimums will be achieved, there may on occasion be greater flexibility required on Brent's standards.
Recommendation	<b>Paragraph 6.17:</b> Add a third sentence to that states: " <u>There may be flexibility shown where the provision of these</u>

<b>Other non-significant changes considered appropriate to improve the document.</b>	
	space standards on site would otherwise have a significant impact on affordable housing delivery rates. However, as a minimum the London Plan standard of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant.”
Part of Document	Chapter 6 Housing: Paragraph 6.18
Issue	Provide clarity that the 500mm planting buffer strip is not necessary in addition to where a planting strip would be provided in the public realm. The aim is to ensure suitable provision of a quality landscaping buffer adjacent or within the public realm, it does not need to be duplicated if provided in the public realm.
Recommendation	<b>Paragraph 6.18</b> change to: Ground floor residential properties will be provided with a 1.5 metre depth garden excluding a 500 mm strip for planting against the public realm. <u>However, where the public realm is providing a 500mm or larger planting strip on the boundary of the property, there will be no need for the property itself to provide this 500mm strip.</u>
Part of Document	Chapter 7 Community Facilities: Paragraph 7.14
Issue	Granville Centre identified as Granville Plus Centre. Existing occupiers housed includes Brent Start who no longer have a continuous on site presence, but do use the centre.
Recommendation	<b>Paragraph 7.14</b> change to: “The Carlton and Granville Plus Centres house a number of community uses.” “Brent Start”
Issue	Best One Convenience Store more on Rupert Road than Albert Road.
Recommendation	<b>Paragraph 7.17</b> change to: “Albert Rupert Road”
Part of Document	Chapter 8: Transport and Movement - Principle T1
Issue	The principle needs to better align with the figures showing the proposals in the movement framework and as a result of the proposed response to now not pursuing opening up of Malvern Road along its length and pedestrianisation of Malvern Place.
Recommendation	<b>Principle T1</b> Change: “ <u>1 The opening up of Denmark Road west to connect to Carlton Vale as a pedestrian / cycle route; The extension of Canterbury Road west where currently pedestrianised from Rupert Road; Reopen the road closures on Malvern Road (south of Malvern Place), Denmark Road/Cambridge Road and Canterbury Road/Carlton Vale for local traffic access as a grid of one way streets with provision of wider walking and cycling, and during development create new road connections between Malvern and Stafford Roads.</u> ” <b>Principle T1</b> Change: “ <u>8 Closure of the junction of Malvern Road and Carlton Vale to motor vehicles with the retention of a walking and cycling link between the Malvern Place and Carlton Vale</u> ”
Part of Document	Chapter 8: Transport and Movement - Principle T1
Issue	The principle needs to better reflect the text within the SPD related to a 20mph zone within South Kilburn.
Recommendation	<b>Principle T1</b> Add: “ <u>8 Create 20mph zones on the secondary and tertiary roads in South Kilburn.</u> ”

<b>Other non-significant changes considered appropriate to improve the document.</b>	
Part of Document	Chapter 8: Transport and Movement - Principle T1
Issue	The principle promotes a use for Neville Close which is now not considered appropriate following the determination of the Peel development. Neville Close is likely to become a private servicing area, with pedestrian movement concentrated through the Peel public realm.
Recommendation	<b>Principle T1 9</b> Change to: “Enhancement of Neville Close as a walking and cycling link between the extended Canterbury Road and Carlton Vale to provide a continuous walking and cycling link to Albert Road via Denmark Road... Extension of Neville Road northwards to reinstate lost connection with Albert Road”
Part of Document	Chapter 9: Green Infrastructure - Principle GI1
Issue	The principle makes reference to Granville Road, it could be clearer on this matter and identify the proposed replacement for Granville Road open space.
Recommendation	<b>Principle GI1</b> change: “Additional public open space will be provided at: on the Gloucester House and Durham Court site; on the existing Hereford House/Exeter House; site as a replacement for the existing as an extension to Granville Road open space; Denmark Road Pocket Park; and along Cathedral Walk.”
Part of Document	Paragraph 11.7 and Figure 18: Phasing
Issue	The figure title does not reflect the contents of Paragraph 11.7.
Recommendation	<b>Paragraph 11.7</b> Delete and <b>Figure 18</b> Amend Title to: “ <i>The Indicative phasing plan of associated street improvements, public realm and open space works.</i> ”
Part of Document	Section 12: Gloucester House and Durham Court
Issue	Add the fact that the site also has an Energy Centre as part of the planning permission for its redevelopment.
Recommendation	<b>Section 12: Gloucester House and Durham Court</b> Change to: “ <b>Proposed:</b> Mixed tenure housing development with an energy centre (for the South Kilburn District Energy System) and new amenity space incorporating playspace.” Last sentence: “The Council will seek has sought a delivery partner to implement the planning permission that has been granted”
Part of Document	Section 12: Peel
Issue	Update the planning status of the development, which has been minded to approve subject to the signing of a S106 obligation.
Recommendation	<b>Section 12: Peel</b> Change to: “ <b>Planning history:</b> Planning application submitted. Ref 16/4174 determined and minded to approve by Planning Committee subject to a signing of a S106 obligation.” Change to: “ <b>Indicative development capacity:</b> 2131 sq.m. D1 health/community, 397 sq.m. retail uses and up to 226 dwellings.” Change to: “Peel Precinct is a local shopping parade containing a range of commercial uses and one doctors’ surgery with residential above and former housing office in portacabins, now South Kilburn Studios meanwhile use, (a project

<b>Other non-significant changes considered appropriate to improve the document.</b>	
	of the South Kilburn Trust)-and two other housing blocks (now South Kilburn Studios meanwhile use).” Change to: <b>Design Principles:</b> “This site is subject to a planning application (Reference 16/4174) determined and minded to approve by Planning Committee subject to a signing of a S106 obligation. This will deliver up to 226 dwellings in five separate blocks to the north and south of a reinstated Canterbury Road.”
Issue	Update the site details to reflect that the South Kilburn Studios are a project of the South Kilburn Trust.
Recommendation	<b>Section 12: Carlton and Granville:</b> Change to: “This would include space for the South Kilburn Studios a project of the South Kilburn Trust which will be displaced by the Peel development.”
Part of Document	Section 12: Wordsworth, Masefield and part of South Kilburn Open Space
Issue	More recent discussions with the schools have identified a desire from them to consider potential provision of housing on site for staff members to assist with recruitment and retention. Residential in association with the school site was tested in early phases of the masterplan development, but was not pursued in the final document as discussions with the schools were not as advanced as now. However, it is considered that sufficient space exists on site to allow this to be delivered and not adversely impact on the surroundings, or the functioning of the school.
Recommendation	<b>Section 12: Wordsworth, Masefield and part of South Kilburn Open Space</b> Change to: “Redevelopment to provide a new school building to incorporate the existing Kilburn Park Junior and Carlton Vale Infants Schools, plus nursery, and community space and residential.” and <b>Design Principles:</b> The three storey school building (with potential for additional modest height increases to accommodate residential development should this be provided to meet staff needs) with clearly defined and animated frontages will provide a perimeter block on Stafford Road and Percy Road, plus public realm to the south between it.”
Part of Document	Section 12: South Kilburn Methodist Church
Issue	Amend to include full title of adjacent Muslim centre to which it refers to.
Recommendation	<b>Section 12: South Kilburn Methodist Church</b> Change to: <b>Justification:</b> The premises provide the opportunity to infill either on its own or probably of more benefit with the adjacent UK Albanian Muslim Community and Cultural Centre to create an animated ground floor use with residential uses above to provide a more intensive use of land and improve townscape.”
Issue	Reference to illustration or figure that was in an earlier pre-consultation draft and included by mistake.
Recommendation	<b>Section 12: Canterbury House Design Principles – (See Illustration 18)”</b> <b>West Kilburn Baptist Church</b> Design Principles – “(See Illustration 19)” <b>UK Albanian Muslim Community and Cultural Centre</b> Design Principles – “(See Illustration 20)” <b>St Mary’s Roman Catholic Primary School</b> Design Principles – “(See Figure 39)” <b>Royal Mail Sorting Office/Mint Coaches</b> Design Principles – “(See Figure 40)” <b>St Mungo’s/Salvation Army</b> Design Principles – “(See Figure 41)”

<b>Other non-significant changes considered appropriate to improve the document.</b>
The Educational and Cultural Centre IR Iran Design Principles – “(See Figure 42)”