



Executive
12th February 2007

**Report from the Director of
Environment and Culture**

For Action

Wards Affected:
Queens Park & Kilburn

**Queens Park Station Area Supplementary Planning
Document – Approval for Adoption**

Forward Plan Ref: E&C–06/07-040

1.0 Summary

- 1.1 This report seeks approval for adoption of the Queens Park Station Area Supplementary Planning Document (SPD) and its accompanying Sustainability Report (SA) and Consultation Statement following changes recommended in the responses to representations to the draft SPD as set out in Appendix 1. Copies of the draft SPD and SA were appended to the Executive report of 13th November 2006. Members should refer to this report if they would like to view copies of these documents.

2.0 Recommendations

That the Council's Executive:

- 2.1 Adopt the Queen's Park Station Area as Supplementary Planning Document to the Brent Unitary Development Plan 2004;
- 2.2 Agree an exclusivity agreement between the Council and Hyde Housing/Bellway Homes Plc/Taylor Woodrow Homes Plc and delegate to the Head of Property and Asset Management, in consultation with the Borough Solicitor, the determination of the detailed terms of the agreement.
- 2.3 Delegate any minor changes to the final draft to the Director of Planning Services.

3.0 Detail

Site Description & History

Site

3.1 The SPD site is bounded by Claremont Road to the west, Kilburn Lane to the south, Salusbury Road to the east and the Silverlink/Bakerloo railway line to the north and is approximately 0.58 Ha in size. The area includes the following sites (see figure 1 below):

- Premier House & Keniston Press
- Falcon Pub & Cullen House
- Council public car park



Figure 1: Site boundary

History

3.2 A brief history of the site and explanation of the development of this SPD is outlined below:

- In 2003 a Planning Brief was produced for the area around the station which supported a “landmark” development but did not specify storey height.
- In 2005 the South Kilburn SPD was approved which suggested development on the site should be between 10 and 20 storeys high.
- In May 2005 Genesis Housing Group submitted a planning application for a 26 storey tower which was withdrawn in October 2005.
- The Council set up a Stakeholder Group in early 2005 which met three times to discuss the development options for the site. This work has resulted in a preferred layout for the site, which is reflected in the SPD.
- In June 2006 the new administration agreed to withdraw the 2003 planning brief and agreed to bring forward a new SPD for the site.

Development of the new SPD

Early Consultation

- 3.3 Your officers carried out consultation prior to the drawing up of the draft SPD to gauge the likely support for an SPD and to include any concerns from local residents and businesses. As outlined earlier, the Stakeholder Forum, (made up of local residents, LBB planning officers and Genesis Housing Association (the former applicant)) met three times to discuss the development options for the site, with particular focus on the layout of the site including the road layout, the height of the potential scheme and the options for the massing and design of the site. Architects Munkenbeck and Marshall were commissioned by the council to study options for developing the site and to produce illustrative materials for discussion at the group's meetings. These images and notes of the meetings were subsequently all available on the council's web pages and the representatives that attended the meeting were responsible for disseminating information to the areas/groups they represented and to bring the local residents views back to the forum.
- 3.4 A model and posters illustrating the work carried out in this group were taken to Queens Park Day on 11th September and displayed in the Community Tent. The majority of the people were keen to see this area redeveloped and supported a courtyard form of development across the whole SPD area.
- 3.5 The council also held a public meeting at Queen's Park Community School on 19th October to present the findings of the Stakeholder group and ideas of the initial objectives for the SPD and the models and posters illustrating the work of the stakeholder group.

Sustainability Appraisal

- 3.6 A Sustainability Appraisal (SA) was carried out during the pre-production phase of the SPD. The process informs the development of the SPD to ensure that sustainability issues are comprehensively considered in drawing up the SPD. Representatives from Housing, Transportation, Environmental Health, the PCT and the Directorate all provided input into the assessment and discussed the main issues at a meeting. Following this meeting a draft Sustainability Appraisal Report was drawn up which accompanied the draft SPD for public consultation purposes.
- 3.7 The main issue raised was the sustainability of the provision of car parking for residents. There were a number of reasons for this change. The new administration considers that residential car parking should be provided on the site. Car parking would assist in the saleability of any for sale units and this is important to assist the viability and attractiveness of the South Kilburn redevelopment project. Members were also concerned that in terms of equity, those on lower incomes should not always be denied parking while those existing residents, often on larger incomes, have parking spaces. The withdrawn scheme was a car free scheme with some limited parking for local shoppers. The Sustainability Appraisal points out that increased parking will generate more traffic, increase building costs, exacerbate air quality problems and generally reduce the sustainability and environmental benefits of a

scheme on the site. However, in view of its role in the early phase of the development, the planning objectives in this instance override these concerns.

Formal Public Consultation

- 3.8 The draft SPD and accompanying SA and Consultation Statement were published for a formal public consultation period between 23rd November until 11th January as required by the Planning and Compulsory Purchase Act 2004. In order to publicise this consultation period the council distributed over 5000 leaflets to both Brent and Westminster local residents and businesses. These leaflets contained a brief summary of the SPD and space was provided for comments which could be returned to a freepost address. We also put over 30 posters up advertising the consultation period and the public exhibitions in the area surrounding the SPD site. Copies of the SPD and accompanying documents were available to view at Kilburn One Stop Shop, Kilburn Library, Brent House One Stop Shop, Kensal Rise Library and Albert Road Community Centre. Residents were also able to view and comment on the draft SPD online or alternatively could download the documents and write in with their comments.
- 3.9 Two public exhibitions (28th November & 4th December) were held to give local residents the opportunity to view plans, models and illustrations showing the layout, scale and massing of the proposals required in the draft SPD and also to discuss the draft SPD with planning officers. Finally, a public meeting was convened by Westminster Council on 10th January 2007 to inform Westminster residents of the process undertaken in the production of the SPD so far, and the contents of the draft SPD.

Representations

- 3.10 The representations made and draft officer comments and recommendations can be found at appendix 1 of this report. The table provides the name of respondents, the nature of their response, which is categorised into "object", "support", "support with conditions", "observations" (which tend to be responses which are either statements and questions) and "other". A summary of the response is provided and then the full response given by the individual. The final two columns contain the draft officer's recommendation, which outlines officer response to the representation and then lastly a column with "outcome" which shows the changes to the SPD recommended by your officers.
- 3.11 89 written responses were received from a variety of residents, stakeholders and statutory consultees. The following section sets out the common themes of the representations submitted and any changes recommended to the draft SPD as a result of these comments.

Key Issues

Height

- 3.12 Approximately 11% of respondents were concerned about the height of the tallest element of the building at 12 storeys. Several respondents believed that the tallest element of any development should be limited to 4/5 or 6 storeys

and believed that the proposals were “out of scale for the local area”. However, in light of the location of the SPD site adjacent to the key transport node of Queen’s Park Station, with a public transport accessibility level (PTAL) score of 6 which is very high, the significant costs associated with assembling the site and their impacts upon viability, your officers believe that 12 storeys on a small part of the site is an appropriate height for development at this site. In addition to this, 12 storeys on part of the site allows the majority of the site to be developed at 4 storeys, which is sympathetic to the more sensitive parts of the site along Kilburn Lane and Claremont Road. Therefore no changes to the SPD are recommended.

- 3.13 Approximately 12% of comments noted that 12 storeys worked well on the SPD site and the consortium of developers (Hyde Housing, Bellway Homes & Taylor Woodrow) undertaking the regeneration of South Kilburn believed that this height restriction should be removed, as London Plan policies require housing units and densities to be maximised in locations with very good public transport accessibility. However, the council’s work has established that a development of 12 storeys has minimal impacts on local views and into and out of Queen’s Park Conservation Area, and in light of other comments wanting to restrict the height to 4/5 storeys, your officers recommend that no changes are made to the SPD.
- 3.14 In terms of the location of the tallest element of any development on the site, there was a fairly even split between those favouring locating the tallest element at the north eastern corner of the site, adjacent to the station and locating it at the south eastern corner on the junction of Carlton Vale and Kilburn Lane. However, your officers are minded to recommend that the SPD is altered to indicate a clear preference for the location of the tallest element of any development to the north eastern corner adjacent to the station. We recommend this for a number of reasons:
- it creates the least impact upon daylighting and sunlighting;
 - creates a landmark gateway to the Queen’s Park area;
 - compliments development planned as part of the South Kilburn Masterplan;
 - Prevents overshadowing of the courtyard and residential units within the scheme; and
 - The residents and traders in the shops and flats on Kilburn Lane will feel less overlooked.
- 3.15 This will not preclude development at the Falcon site if it can be demonstrated, through innovative design, that concerns over daylighting and sunlighting and impact on the amenity of those on Kilburn Lane can be overcome.
- 3.16 One respondent would like clarification on the exclusion of the station area and British Legion sites from this SPD, as they were originally included within the Queen’s Park Planning Brief from 2003. We have therefore recommended that additional text is added at section 2.2 explaining that: *“The SPD site can be treated as a separate development site that can come forward for beneficial use regardless of where South Kilburn proposals are confirmed.”*

Thus the British Legion site is dealt with in the South Kilburn SPD. It should be noted that the council wishes to relocate that use into the SPD site which frees up the British Legion site for development that will benefit the rest of the South Kilburn area."

- 3.17 However, officers also recommend that the additional text is included within the "Design Principles" section under 4.5 to ensure that development at the Albert Road site complements that of the proposals contained within this SPD.

Roads & Public Transport

- 3.18 About 10% of respondents raised "serious concerns" about the potential impacts upon traffic and public transport infrastructure (such as the capacity of tubes and trains) in the local area. However, the arrangement of buses, capacity of the tube system and local traffic network were taken into consideration, and the road and bus route arrangement was the starting point for developing a layout for the site. The layout of the site and new locations for bus routes and stands was discussed with Transport for London (TfL) and the final layout of the site was based on TfL's preferred layout for the buses and TfL support the layout outlined in the SPD. The capacity of the tube system was thought at an initial inspection by Transport Consultants to be able to cope with any additional use generated by a development on this site. The inclusion of a second access to Queen's Park Station was supported by TfL in their comments.
- 3.19 The re-arrangement of the roads aims to rationalise the road layout and aims to reduce traffic congestion in the local area. Any planning application for development of the site will be required to carry out a full Transport Assessment (TA) which should identify and model the likely impacts upon traffic in the local area, and demonstrate that the proposals do not significantly impact upon the local area.
- 3.20 In addition to this, the regeneration of wider South Kilburn area will generate monies from legal agreements which can be put towards improving Queen's Park Station, which was raised as a significant concern by a number of residents.

Local Infrastructure & Density

- 3.21 Approximately 10% of representations were made objecting to the proposals on the basis of the impact on the local infrastructure (schools, health care and community facilities) which are seen as at capacity at the moment. These respondents believe that the proposals outlined in the SPD will stretch local infrastructure too much, especially as there are several other developments proposed in the area. In response, we have highlighted that the redevelopment of South Kilburn will require the development of a new 3 form entry primary school, a healthy living centre and improved community & sports facilities which will be open to all, and residents of the Queen's Park development will be able to use. However we recommend that the following wording is added at objective 8 of the SPD to read: *"Ensure new and replacement community facilities and adequate local infrastructure: New and replacement community facilities will be sought as part of the development to address the needs of the local area. In addition to this, developers will be*

required to contribute towards the costs of local infrastructure, such as schools, offsite. This will be achieved through the use of planning obligations.”

- 3.22 In terms of density, the consortium of Hyde, Bellway and Taylor Woodrow requested clarification on the appropriate density outlined in the SPD. Your officers recommend that the following wording is added at the second paragraph of section 4.3 of the SPD to clarify the acceptable densities for the site: *“In view of the site’s excellent public transport accessibility and proposed transport improvements the council will consider densities in excess of these guidelines given exemplary design standards, layout and level of sustainability.”*

Parking

- 3.23 9% of respondents think that the scheme should be car free, given the excellent public transport links afforded by the proximity of Queen’s Park station and the bus routes in the area. However, your officers recommend that no changes be made to the SPD, as the levels of car parking required in it reflect a desire by the council to balance the needs of car users, local residents and the protection of the environment and will ultimately be a question of viability. It is unlikely that with over 200 units to be built, that they could all be supplied with a car parking space without the development becoming unviable as this would probably require 3 levels of basement car parking. The SPD includes the requirement for the provision of a car club which were supported by several respondents.

- 3.24 Westminster residents also raised concerns over the level of car parking, and your officers recommend additional wording is added at section 4.9 “parking and servicing”, to include recognition that it is very likely that provision of short stay car parking cannot be viably provided on site, however it welcomes the provision of this, subject to considering its impact on the road network. It is also recommended that wording is added in this section requiring the provision of an adequate level of car parking to be provided for TfL staff working anti social hours.

Safety & Security

- 3.25 The most frequent concern raised in 13% of the representations was the safety and security of the proposed courtyard, as there would be no traffic running through the site which would provide surveillance. The SPD requires “Secure by Design” standards to be incorporated which should design out crime. The retail and commercial uses promoted within the development would ensure the area is a busy well used space, and the residential units above would provide natural surveillance. It is recommended that changes are made to objective 10 emphasising that development that is safe and secure *“will be required”*, and the council will also *“seek to ensure”* that the development is well managed and maintained.

Level of Affordable Housing

- 3.26 5% of individuals raised concerns about the level of affordable housing, and that at least 50% should be affordable housing. The SPD requires 50% of the units to be affordable housing, however it recognises that there are particular development constraints on this site that may mean less than 50% is more

likely to be achievable. Hyde, Bellway & Taylor Woodrow requested a more flexible approach to the provision of affordable housing to be undertaken. Your officers recommend the addition of the following wording to further clarify the requirements for the site. The words *“taking into account issues of viability”* added to the end of the sentence “It is expected that the number of family social rented units should be maximised within the constraints of the site”.

Layout & Design

- 3.27 11% of representations cited the design of the scheme as not appropriate for this site, and would support the development of a “Victorian Mansion block” or “Victorian style terraces” on this site. The illustrations in the SPD were thought to promote an “ugly” inappropriate development for the site. However, it was pointed out that these illustrations were meant to be indicative of the likely scale and massing of any development on the site and any development would be expected to be of exemplary design quality. Your officers feel that the illustrations adequately illustrate these elements, and therefore do not recommend any changes to be made to the SPD. Please note that members have agreed to an Architectural Competition which is hoped will result in a high quality and innovative design for the development of the site, and will also allow for a level of community involvement. English Heritage suggested the principle of enhancing features of local distinctiveness is included within the SPD to help achieve a sense of place. Your officers recommend that additional text reflecting this suggestion is added at section 4.2 “Design Principles” and also updating the Sustainability Appraisal report.

Landscape & Public Realm

- 3.28 Several respondents raised concerns over the level and quality of landscaping promoted by the SPD, and suggested more trees and a greenspace like a “mini Queen’s park” should be promoted. Your officers recommend that the provision for trees in the SPD is strengthened through altering the wording at the 10th bullet point in section 4.1 to read: *“improvement of the ecological diversity of the site through the planting of trees and landscaping of the development, with particular regard to native species.”*

Sustainability

- 3.29 The majority of respondents supported the sustainability measures required by the SPD although concerns were raised by Hyde, Bellway & Taylor Woodrow over the “catch all” nature of the requirements set out in the SPD. Your officers recommend that no changes are made as the sustainability section sets out the various methods which the council encourages the use of on the site, and does not prescribe which ones should be used here, as it is up to the developers to work out what is possible.

Summary

3.30 The graph below illustrates a breakdown of the key issues and the proportions of respondents who highlighted these issues in their representation.

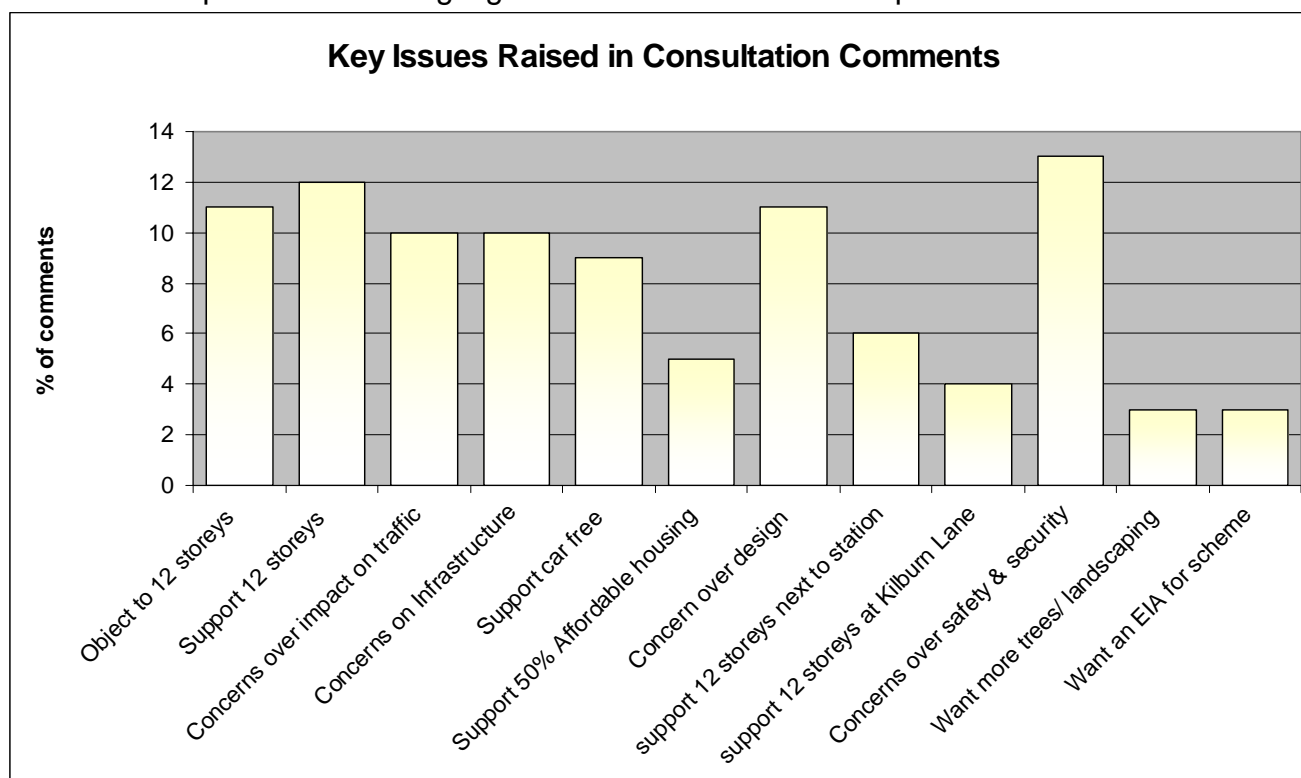


Figure 2: Graph illustrating key issues raised

3.31 Overall there the split of the responses is as follows:

- 28 object
- 6 support
- 27 support with conditions
- 26 observations (which were in the form of statements and questions)
- 2 other

3.32 Transport for London, South Kilburn NDC, Westminster City Council and the local residents association (QPARA) are all broadly in support of the SPD and its contents. No other representations were received on the Sustainability Appraisal Report.

Conclusion

3.33 From a position where the council had hundreds of objections to the “tower” proposals, the majority of those who attended public meetings broadly supported the SPD proposals. This includes many of those who campaigned for the “Stop the Tower” group. That is not to say that their support is without reservation. Your officers are now confident that these proposals command significant support in the local community.

Exclusivity Agreement

3.34 The Council has been approached by a development consortium consisting of Hyde Housing Association Limited, Bellway Homes Limited and Taylor

Woodrow Limited (“the Consortium”) requesting the Council to enter into an exclusivity agreement with them under which the Council would agree not to negotiate with any parties with regard to sale of the Council’s land interests for a minimum period of 12 months (the basis of any agreement is set out in Appendix 2 although the Executive is asked to delegate the detailed agreement to the Head of Property and Asset management). In the area of land the Council owns two parcels of land namely Cullen House and the car park also adjacent is the British Legion site on Albert Road. However there are three areas of land owned by different owners; a staff facility operated by London Transport, a pub and offices belonging to another housing association. The Consortium is interested in putting together a comprehensive redevelopment of the whole site. Hyde Housing Association Limited as part of the consortium is the Council’s preferred bidder on the main SKNDC site. The justification for the exclusivity arrangement is that the consortium wish to negotiate with the other three landowners (as well as the Council) to see whether they can agree options to acquire all the land interests to enable a comprehensive redevelopment of the site to be carried out. This may even involve the Council in using CPO powers to support this proposed comprehensive redevelopment. They also need to draw up a scheme for the redevelopment which will be acceptable to planning and the wider community. Their concern is that they will be potentially exposed to incurring both cost and time in putting together a proposal, and in negotiating with the various landowners only to find that the Council could during this same period enter into an agreement with another party to sell its land to them. . They are not prepared to make this investment of time and cost without the proposed agreement.

- 3.35 Thus the proposed exclusivity agreement provides a level of comfort to the consortium both in regard to our actions over the next 12 months and also an implied support for the proposal of a comprehensive redevelopment of this area in support of the regeneration of the SKNDC area.
- 3.36 The Head of Property and Asset Management is satisfied that there are genuinely considerable costs involved in the Consortium attempting to put together a comprehensive proposal.
- 3.37 Under section 123 of the Local Government Act 1972, the Council can only dispose of its land interest at the best consideration reasonably obtainable (unless a general consent or specific consent from the Secretary of State to a sale at an under-value is obtained). Normally this would be shown by marketing of the land. However, in this instance, it is considered by the Head of Property and Asset Management that any one off offer for the land would be less than the Consortium would be willing to pay since the value of the Council’s land interest will in fact be enhanced if a comprehensive deal was put together. Other developers could in theory be invited to attempt to work up a redevelopment scheme, but the reality is that any other such developer would also seek a similar “exclusivity” arrangement. Furthermore, it is intended that some of the residential units in any redevelopment of the site could be used for decanting residents from the main SKNDC area to enable aspects of that development to go ahead.

- 3.38 In the absence of a marketing exercise, to demonstrate that the best price had been obtained for the land when the Consortium's offer was eventually considered, an option available to the Council is to insist upon an "open book arrangement" whereby the Consortium provides details of all its relevant costs and anticipated unit values to allow a reasoned consideration of respective land values taking into account the usual additional factors such as developer's profit. Consequently officers would intend to engage a cost consultant with experience in this type of exercise, to undertake this analysis.
- 3.39 On this basis, officers feel that they can recommend the proposed "exclusivity" arrangement but subject to the proviso that if any offer is made by the Consortium in the "exclusivity" period but is then rejected by the Executive, the Council is no longer bound by the arrangement. This would avoid a situation where the Consortium's offer was rejected as not reflecting the best consideration for the Council's land at the time the offer is considered by the Executive, but the Council was then prevented from approaching other potential developers because of the continuing existence of the arrangement.

4.0 Financial Implications

- 4.1 The SPD is designed to establish the framework for determining an application(s) for the site. The assessment of the planning application will be undertaken in the normal way with costs contained within existing budgets.
- 4.2 There are, however, wider implications arising from any possible development. The associated Section 106 Agreement will secure funding and benefits which will mitigate the impact of the development and contribute to the regeneration of the South Kilburn area and wider surrounding area.

Other financial implications

- 4.4 The estimated cost of the consultation undertaken so far is approximately £17,000 and these expenses have been shared between the planning service and the housing department with contributions from Genesis Housing Group. Future consultation costs would be limited and borne by the planning service.
- 4.5 The cost of holding an architectural competition for the site is estimated to be in the region of £15,000 which the South Kilburn development consortium (Hyde, Bellway & Taylor Woodrow) is contributing towards.
- 4.6 In order to make significant regenerative change to this site, the Council should, in your Officers view, make it clear that it will use its Compulsory Purchase (CPO) powers in order to assemble a site for development if necessary. The council should consider CPO powers as a last resort to achieve its redevelopment objectives. CPO powers will only be exercised where a development partner meets all the cost of acquisition and so indemnifies the council.

5.0 Legal Implications

- 5.1 The Planning and Compulsory Purchase Act 2004 has changed the statutory basis for drawing up development plans in England and Wales. Unitary Development Plans and Supplementary Planning Guidance will be replaced by a Local Development Framework. Since there are no provisions under the Act to produce SPGs the council must now produce SPDs.
- 5.2 Planning Policy Statement 12 'Local Development Frameworks' sets out the procedural policy and process of preparing Local Development Documents including Supplementary Planning Documents. The SPD has been produced in accordance with the guidance contained within PPS12 and in accordance with Brent's adopted Statement of Community Involvement (June 2006). PPS12 requires a Sustainability Appraisal and a consultation strategy to accompany a draft Supplementary Planning Document for public consultation.
- 5.3 Supplementary Planning Documents are not subject to independent examination and will not form part of the statutory development plan. However they should be subjected to rigorous procedures for community involvement.
- 5.4 Supplementary Planning Documents are not statutory documents in the same way as the UDP but are material considerations to be taken into account when determining individual planning applications.

6.0 Diversity Implications

- 6.1 The Statement of Community Involvement identifies how the public are to be engaged in the preparation of SPDs in general. An inclusive approach is suggested to ensure that different groups have the opportunity to participate and are not disadvantaged in the process.

7.0 Staffing/Accommodation Implications (if appropriate)

- 7.1 None

8.0 Environmental Implications

- 8.1 A Sustainability Appraisal has been undertaken on the SPD. The purpose of it is to transform a shabby and run down area into a first class development that is sustainable in the long term.

Background Papers

- Executive Committee Report 23rd August 2006
- Queens Park Station Area SPD Sustainability Appraisal Scoping Report
- Policy Committee Report 5th October 2006
- Executive Report 13th November 2006

Any person wishing to inspect the above papers should contact:

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APPENDIX 1
REPRESENTATIONS & DRAFT
OFFICER RESPONSES & RECOMMENDATIONS

Consultation Report - Representations by consultees on 19-01-2007

Project Title : Queen's Park Station Area Draft SPD consultation

Representor : 114
mr matthew hasson

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|--|--|--|----------------------------|
| Queen's Park Station Area - Supplementary Planning Document | Object | The increase in crime, noise and lack of infrastructure/space will have a huge detrimental affect on the long term prosperity of the area. | <p>I have been resident of Queens Park for 22 years and have seen the area improve immensely. The area has become somewhat gentrified. Many families have moved to the area because it is safe, it has a nice park and has a community feel to it. I beleive this will be spoilt by any development that leads to more flats being built. I beleive the area is almost at saturation point in terms of the number of people in it. The tube is packed. Salusbury Road is already busy enough and it is hard to find a spare bit of grass in the park on a hot day. Encouraging more people to live in the area will increase the pressure on the areas already limited infrastructure. The low cost element of the extra housing will probably lead to a rise in crime.</p> <p>The sketch makes the building look ugly and i predict that it will turn into a grotty housing estate much like Carlton Vale very quickly.</p> <p>The increase in crime, traffic, noise & lack of space on the tube/in the park could drive the prosperity in the north of Queens Park out.</p> <p>Most of the residents in Queens Park are very happy. If it is not broken then</p> | <p>In terms of the concerns raised regarding the potential overcrowding of the Queen's Park area in particular the crowded tube and busy Salusbury Road, the capacity of the tube system and roads have been taken into account when developing the draft SPD. The potential number of units that could be developed on this site is, at initial inspection, not predicted by transport consultants to result in a significant impact upon the tube capacity or the local road network. In fact, the development of the site affords the opportunity to rationalise the road layout and to remove the current problematic gyratory system. Any development on this site would also be required to improve the bus interchange facilities and station access. A full Transport Assessment will also be required to be submitted with any planning application which will need to respond to the problems posed by a new traffic layout.</p> <p>The sketch contained in the draft SPD is illustrative only of the sort of scale, massing and layout of any potential development and is not intended to be prescriptive to the final design of the development. This development will also help to kick start the regeneration of the South Kilburn estate, which will eventually see the redevelopment of much of the housing stock in South Kilburn estate for both private and social housing which will hopefully go towards creating a more balanced community in this area. As part of the redevelopment of South Kilburn, a new Healthy Living Centre, a new 3 form entry Primary School and community facilities are expected to be provided in the area through Section 106 planning obligations, which will be available for the use of the local community and to the new occupants of any development at the Queen's Park Station site. To emphasise the importance of the provision of local infrastructure to serve the new development the following wording is recommended to be added at objective 8: "Ensure new and replacement community</p> | Changes made as indicated. |

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|--|--|--|--|--|
| | | there is no reason to fix it. I strongly oppose this development hopefully there will be enough of us Queens Parkers that oppose it and ensure it does not get built. | facilities and local infrastructure: New and replacement community facilities will be sought as part of the development to address the needs of the local area. In addition to this, developers will be required to contribute towards the costs of local infrastructure, such as a school, offsite. This will be achieved through the use of planning obligations." | |
|--|--|--|--|--|

Representor : 115
Mr A Litvin

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|--|--|-------------------------|
| Queen's Park Station Area - Supplementary Planning Document | Object | I object to the scale of the building. It is out of character with the rest of the area, although there are tower blocks near to the propose site it doesn't mean that local people want more very tall buildings. The rest of the area has low rise structures and there is no reason that this area could not be the same. The loose of light and major space would be very sad for the area and would probably make it a slight less safe area. Walking around at night would feel more intimidating. I very much hope that these plans are changed taking into account local feelings. | In light of the location of the SPD site adjacent to the key transport node of Queen's Park Station, with a public transport accessibility level (PTAL) score of 6 which is the highest, the significant costs associated with assembling the site and their impacts upon viability, it is believed that 12 storeys on a small part of the site is an appropriate height for development at this site. In addition to this, 12 storeys on part of the site allows the majority of the site to be developed at 4 storeys, which is sympathetic to the more sensitive parts of the site along Kilburn Lane and Clarendon Road. This also allows a high quality development, where high quality landscaping will be promoted and wider pavements are promoted (see section 4.7). A full sunlight and daylight assessment will be required as part of any planning application, and development will be expected to minimise shadow and maximise sunlight penetration. No changes recommended. | No changes recommended. |

Representor : 116
Dr Kirit Ardeshta

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---------------------|--------------------|--|--|--|
| 1 Executive Summary | Object | It is crucial that the building does not further divide the areas north and south of the railwayline. Saying the development will be a gateway to salisbury road and | The SPD requires that any development should attempt to link the areas north and south of the railway. Agree change to state a clear preference for siting the 12 storey element adjacent to the station. Recommend this for a number of reasons: - it creates the least impact upon daylighting and sunlighting; | Recommend that all sections referring to the location of the tallest element |

| | | | | |
|-----------------------------|--------------|---|--|---|
| | | <p>Kilburn lane does suggest that the other areas are 'outside' To unify the area it is v impnt that the tall component is not at the Carlton/Kilburn lane end. Ensure building is aesthetically pleaseing when viewed from the outside (esp when approached from Fearnhead road) rather than just considering the courtyard.</p> | <ul style="list-style-type: none"> - creates a landmark gateway to the Queen's Park area; - compliments development planned as part of the South Kilburn Masterplan. - Prevents overshadowing of the courtyard and residential units within the scheme - The residents and traders in the shops and flats on Kilburn Lane will feel less overlooked <p>It is stated that the council will expect any proposals to be of exemplary design standards.</p> | <p>are modified to state a clear preference for the location of the tallest element to the north eastern corner adjacent to Queen's Park station and bordered by Salusbury Road.</p> |
| 2.3 Area & Surroundings | Observations | <p>please ensure traffic island at SE of development is improved and horrible 'chimney' on it removed. Ensure better pedestrian crossings</p> | <p>The traffic island at the south east of the development will need to be taken into consideration when replanning the gyratory system and a satisfactory arrangement will be sought by the council. Section 4.8 of the draft SPD requires improvements to the pedestrian environment at the junction of Carlton Vale and Kilburn Lane in particular, and it is anticipated that this area will be dealt with under this.</p> <p>No changes recommended.</p> | <p>No change</p> |
| 4.1 Sustainable Development | Object | <p>plant more trees throughout development</p> | <p>Section 4.7 of the SPD outlines the requirement for the planting of semi mature and mature trees within the development and along the road frontage. A cohensive landscape strategy is also expected to be drawn up as part of any planning application on the site. The illstrations in the SPD do not illustrate an absolute number of trees expected. The sustainable development section requires the improvement of the ecological diversity of the site through landscape design.</p> <p>Recommend altering the wording at the 10th bullet point in section 4.1 to read:</p> <ul style="list-style-type: none"> - improvement of the ecological diversity of the site though the planting of trees and landscaping of the development, with particular regard to native species; | <p>Recommend altering the wording at the 10th bullet point in section 4.1 to read:</p> <ul style="list-style-type: none"> - improvement of the ecological diversity of the site though the planting of trees and landscaping of the development, with particular regard to native species; |
| 4.10 Safety & Security | Object | <p>ensure it is not just a place for drunks and druggies to hand out</p> | <p>Every attempt will be made to encourage a vibrant and economically successful development, which will be a busy and well-used area by all therefore hopefully will not become a neglected area with their sometimes associated social problems. The measures included in the safety and security sections aim to ensure that these issues do not arise and uses standard 'secured by design' measures. No changes recommended.</p> | <p>No change</p> |

Representor : 118
Mrs Magdalene Whiteley

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|--|--|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Observations | Please can Brent council ensure cycle lanes all around the vicinity of the station, with good facilities for locking up bikes safely. Please can there be as little advertising as possible and some quality mosaics/ public art incorporated in the plan. | The SPD includes a requirement for improved cycle facilities such as cycle lanes along Salusbury Road and Kilburn Lane. Secure covered cycle parking is required at section 4.9. Advertising is not envisaged to be a significant element of any scheme, if any advertising is proposed by developers this will be considered at planning application stage, and will have to adhere to council standards. The S106 section of the document requires the provision of public art within the development. | No change |

Representor : 117
Mr Graham Puddifoot

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|-------------------------|--|--|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Support with conditions | I agree with most of the themes of the draft SPD, but believe that the height should be restricted to a maximum of 5 storeys | In light of the location of the SPD site adjacent to the key transport node of Queen's Park Station, with a public transport accessibility level (PTAL) score of 6 which is high, the significant costs associated with assembling the site and their impacts upon viability, it is believed that 12 storeys on a small part of the site is an appropriate height for development at this site, as Government policy promotes high density development in areas of good public transport accessibility. In addition to this, 12 storeys on part of the site allows the majority of the site to be developed at 4 storeys, which is sympathetic to the more sensitive parts of the site along Kilburn Lane and Claremont Road. This option has also been arrived at in consultation with the community and stakeholders and it is felt that the heights proposed in this document have reflected the local community's concerns whilst working within the various constraints of developing the site. No changes recommended. | No change |

Representor : 120
Dr Julia Glidden

| Heading | Nature of | Summary of | Response / Representation | Officer's | Outcome |
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|---------|-----------|------------|---------------------------|-----------|---------|

| | Response | Response | | Recommendation | |
|---|----------|---|--|---|------------|
| Queen's Park Station Area - Supplementary Planning Document | Support | Redevelopment is strongly supported, plan well thought through. | I believe this development is long overdue. The redevelopment plan is extremely well thought through, and exceptionally sensitive to the integrity of Queens Park. The plans represents a much welcomed boost to the community. Please do not allow vocal minority to once again delay redevelopment. The current area is a dangerous meeting ground for vagrants. The 'silent majority' in Queens Park are eager for a safer neighbourhood. | Comments are noted. No changes recommended. | No change. |

Representor : 121
Mr Simon Thorn

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|--|--|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Observations | 12 storey buildings are too high, urban planning should move away from high-rise plans. Recommend restrictive height to 6 storeys. Aim to enhance light, space and greenery: courtyard style should be green & trees, open and children friendly- not paved concrete. Street lighting and width of thorough fares. | <p>In light of the location of the SPD site adjacent to the key transport node of Queen's Park Station, with a public transport accessibility level (PTAL) score of 6 which is high, the significant costs associated with assembling the site and their impacts upon viability, it is believed that 12 storeys on a small part of the site is an appropriate height for development at this site, as Government policy promotes high density development in areas of good public transport accessibility. In addition to this, 12 storeys on part of the site allows the majority of the site to be developed at 4 storeys, which is sympathetic to the more sensitive parts of the site along Kilburn Lane and Claremont Road. This allows a high quality development, where high quality landscaping will be promoted and wider pavements are promoted (see section 4.7). A full sunlight and daylight assessment will be required as part of any planning application, and development will be expected to minimise shadow and maximise sunlight penetration.</p> <p>Changes recommended as outlined to other respondents to emphasise importance of trees and preference for provision of roof gardens.</p> <p>No additional changes recommended.</p> | No change |

Representor : 122
Ms Gill Hallifax

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recommendation | Outcome |
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| Queen's Park Station Area - Supplementary Planning Document | Support with conditions | Beautifully green and compact but the proposal is too high and the station site too narrow. Courtyard is a good idea bearing in mind to design out crime. Terraced housing would be better. | It all looks beautifully green & compact, but only 10 storeys in the picture, and they are very close together. I suspect the height has been minimised in the picture. I still think it is too high: there are twelve layers to the flat opposite and they have more space around them, the station site is too narrow. I like the courtyard idea and the pedestrian links so long as they aren't dark walkways with hiding places for druggies and worse. A few little terraced houses like the ones in the street round the Jubilee centre would be much better. | The pictures depict a 12 storey element at the corner of Salusbury Road and Queen's Park station, it may appear to be only 10 storeys but 2 storeys are set back at this corner. These pictures are illustrative only, meant to show the potential height and massing of a development there, any applicants will be expected to develop their proposals using the layout and massing shown, but the development will not be expected to follow these illustrations "to the letter". Design will be expected to be of exemplary standards. In light of the location of the SPD site adjacent to the key transport node of Queen's Park Station, with a public transport accessibility level (PTAL) score of 6 which is high, the significant costs associated with assembling the site and their impacts upon viability, it is believed that 12 storeys on a small part of the site is an appropriate height for development at this site, as Government policy promotes high density development in areas of good public transport accessibility. In addition to this, 12 storeys on part of the site allows the majority of the site to be developed at 4 storeys, which is sympathetic to the more sensitive parts of the site along Kilburn Lane and Claremont Road. Every attempt will be made to encourage a vibrant and economically successful development, which will be a busy and well-used area by all therefore the will not become a neglected area with their occassionally apparant associated social problems. The measures included in the safety and security sections aim to ensure that these issues do not arise and uses standard 'secured by design' measures. No changes recommended. | No change |
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**Representor : 123
Mr Robin Matheson**

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|---|--|--|-------------|
| Queen's Park Station Area - Supplementary Planning Document | Observations | Concern raised over pedestrian crossings and crime. | I am concerned about the pedestrian traffic being only through the underneath part of the building. Would the bus stop be moved to somewhere more open and safe? Would there be pedestrian crossings to avoid walking under the building in the dark? You may be changing the look but local residents will remain the same. Unfortunately, that area is currently a hang out for drunks and hooded youths, but at least now it is open enough to be seen from all directions. | Every attempt will be made to encourage a vibrant and economically successful development, which will be a busy and well-used area by all therefore hopefully will not become a neglected area. The measures included in the safety and security section aim to ensure that these issues do not arise and requires standard 'secured by design' measures which seek to design out crime. Any proposals for the site will be expected to create a well lit, safe and attractive pedestrian environment. Also, given the constraints of the site and the resulting issues of viability the council is prepared to accept less than 50% affordable housing on this site, which is highlighted in the SPD. The final development would be expected to create an attractive well lit environment and may not necessarily be designed to overhang the pathway. No modifications recommended. | No changes. |

Representor : 124
Mr MA Morris

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|-------------------------|---|--|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Support with conditions | In general I approve the scheme. My main concern is the very narrow entrance and the central area from Kilburn Lane. I hear that the central area garden will be subject to rigorous maintenance. | The pictures in the SPD are illustrative only, meant to only to give an idea of the massing, layout and height options that architects drawing up a scheme for the site should work to. A comprehensive landscaping strategy will be expected as part of any planning application and contributions towards the maintenance of this landscaping both within and outside the courtyard will be required through planning obligations. No changes recommended. | No change |

Representor : 125
Mr Thomas Jibogun

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|---|--|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Observations | More planting and landscaping, especially along pavements. Highest point should be where Falcon pub currently is. More pass throughs and openings along Saulsbury Road. Modern classical styling would be better (St Pauls Cathedral re development). | <p>Section 4.7 of the SPD requires semi mature and mature ornamental tree planting and landscaping both within the courtyard and along the road frontage. A comprehensive landscaping strategy is also expected to be submitted as part of any planning application. See change already made to section 4.1 to emphasise the inclusion of trees to assist in increasing the ecological diversity of the site.</p> <p>The pictures contained within the SPD are only meant to illustrate the layout, scale and massing of the buildings and not prescribe the number of trees, landscaping or style/ full design of the buildings which will be worked up by architects when drawing up a scheme for the site.</p> <p>See changes made to all sections of the SPD referencing the location of the tallest element stating a clear preference for the tallest element at the north eastern corner. Recommend this for a number of reasons:</p> <ul style="list-style-type: none"> - it creates the least impact upon daylighting and sunlighting; - creates a landmark gateway to the Queen's Park area; - compliments development planned as part of the South Kilburn Masterplan. | No change |

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| | | | <p>- Prevents overshadowing of the courtyard and residential units within the scheme</p> <p>- The residents and traders in the shops and flats on Kilburn Lane will feel less overlooked</p> <p>This will not preclude development at the Falcon site if it can be demonstrated through innovative design that concerns over daylighting and sunlighting and impact on amenity of those on Kilburn Lane can be overcome.</p> <p>No further changes recommended.</p> | |
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Representor : 126
Mr N Morley

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|--|---|------------------------------------|
| Queen's Park Station Area - Supplementary Planning Document | Object | As I have already explained by e-mail, my main concern is over-crowding in this area. London is busting at the seams, and we dont want more people living in the capital. There will be much too strain on services such as doctors , dentists , social workers, traffic congestion, transport etc | <p>The potential number of units that could be developed on this site is, at initial inspection, not predicted by transport consultants to result in a significant impact upon the tube capacity or the local road network. In fact, the development of the site affords the opportunity to rationalise the road layout and to remove the current problematic gyratory system. Any development on this site would also be required to improve the bus interchange facilities and station access. A full Transport Assessment will also be required to be submitted with any planning application which will need to respond to the problems posed by a new traffic layout.</p> <p>As part of the redevelopment of South Kilburn, a new Healthy Living Centre, a new 3 form entry Primary School and community facilities are expected to be provided in the area through Section 106 planning obligations, which will be available for the use of the local community and to the new occupants of any development at the Queen's Park Station site. Changes made to objective 8 to requiring the developers to contribute towards the costs of local infrastructure.</p> <p>No further changes recommended.</p> | Changes made as per other comments |

Representor : 127
Mr Christian Robledo

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recommendation | Outcome |
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| Queen's Park Station Area - Supplementary Planning Document | Support with conditions | Good courtyard idea, ratio of private:public tenants is key to success. Design competition is also good providing public participation. | I like the idea of the courtyard as long as it becomes a useful living space. For that it would be important to put shops, cafes on the inside of the courtyard. Also making the walk through it both necessary and pleasurable making sure that it is always busy. A key point of the project being a success it is getting the ratio between private housing and council tenants (50:50). The idea for a contest for the final design is also good as long as the winner is decided openly by the local people. | Shops, cafes, restaurants and bars within the courtyard are promoted in the SPD. Given the constraints of the site and the resulting issues of viability, the council is prepared to accept less than 50% affordable housing on this site, which is reflected in the SPD. This is because the overriding aim of the council is to achieve a high quality, sustainable development on this site which helps to kick start the regeneration of South Kilburn. No changes recommended. | No change. |
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**Representor : 129
Ruth Dar**

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|-------------------------|---|--|---|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Support with conditions | The development should be car free, money should be used for social housing. Suggestion for an electric car club. | I am appalled that there is to be parking space underneath the development. Those at the public meeting are not likely to buy in the development. Things have changed since that meeting, people now know more about CO2 levels, the worsening of the planet e.t.c. This should be car free: there is fantastic public transport, there's no need for that much additional car traffic. There is experience that other private developments that there are no tokens for spaces at £20k+. The additional cost of excavation could be better put into social housing. Station improvement. The only way to improve the environment is to have fewer cars and more social housing, so that local tenants could live locally and walk to work. Lets have an electric car club perhaps.... | The requirement for car parking spaces in the SPD reflects a desire by the council to balance the needs of car users, local residents and environmental protection and will ultimately be a question of viability. Section 4.9 of the SPD states that basement car parking should be provided subject to the financial viability, therefore the levels of car parking is dependent upon this. The text in this section also states that the implementation of a car pooling scheme will be expected on this site. No changes recommended. | No change |

**Representor : 130
Mr James Hope**

| Heading | Nature of | Response / | Officer's Recommendation | Outcome |
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| | Response | Representation | | |
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| Queen's Park Station Area - Supplementary Planning Document | Support with conditions | Strongly support the idea of a car free zone in the development or the provision only for car club members. Also want to see a proper station redevelopment as part & parcel of this scheme. | The requirement for car parking spaces in the SPD reflects a desire by the council to balance the needs of car users, local residents and environmental protection and will ultimately be a question of viability. Section 4.9 of the SPD states that basement car parking should be provided subject to the financial viability, therefore the levels of car parking is dependent upon this. The text in this section also states that the implementation of a car pooling scheme will be expected on this site. As part of the stakeholder group discussions last year the council looked into whether it was possible to get Queen's Park station redeveloped, however the level of development likely to occur on this site, will not generate significant enough monies through Section 106 planning obligations to allow station redevelopment. However the redevelopment of South Kilburn may generate, through Section 106 agreements, a significant amount of money for transport improvements which can be put towards improving the station. No changes recommended. | No change |

**Representor : 131
Mr B Newton**

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|--|---|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Observations | It is preposterous to include costly car parking when the development is within spitting distance of a LUL line, Silverlink, and 3 bus routes. How would this fit in with all attempts to reduce car use in London generally? It appears that the development flies in the face of thinking on the subject of pollution. | The requirement for car parking spaces in the SPD reflects a desire by the council to balance the needs of car users, local residents and environmental protection and will ultimately be a question of viability. Section 4.9 of the SPD states that basement car parking should be provided subject to the financial viability, therefore the levels of car parking is dependent upon this. The text in this section also states that the implementation of a car pooling scheme will be expected on this site. No changes recommended. | No change |

**Representor : 132
Mr George Webb**

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|--|---|--|-----------|
| Queen's Park Station Area - Supplementary | Observations | Concerned that bus interchange would cause | I am concerned about the bus interchange proposed on Kilburn Lane which will probably cause | The bus interchange is proposed to the north of the site adjacent to the station, which is where the number 36 bus will terminate, stand at and start from. This layout was the preference of Transport for London (TfL) | No change |

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| Planning Document | | additional traffic, it would be better placed behind the site next to the rail link. | more congestion to an already very busy road. The road would instead provide an extension to the boutique style shopping as seen on Saulsbury Road. I am also concerned for the residents on the road and the noise and pollution the buses will cause. The bus interchange would be much better tucked at the back of the development by the railway link. | as operator of the bus routes in the area. An option with the bus interchange to the north of the site was presented to TfL but was not favoured as would mean the diversion of existing bus routes. The buses shown along Kilburn Lane in figure 4 are intended to illustrate the approximate location of bus stops. This part of Kilburn Lane is intended to become an extension of the shopping parades of Salusbury Road and Kilburn Lane and this is promoted within the SPD. The reconfiguration of the bus routes in this area will result in less disturbance to the residents of Claremont Road, as there will only be one bus route using this road, and it will no longer have to travel up the full length of Claremont Road, and will only use the section illustrated in figure 4 (section 4.8 of the SPD). No changes are recommended. | |
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**Representor : 133
Mr Nick Hartley**

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|-------------------------|--|--|------------|
| Queen's Park Station Area - Supplementary Planning Document | Support with conditions | The revision is a great improvement. I support very strongly either no car parking facilities (or reduced parking in line with current trends) and provision of a city car club location. Given the excellent public transport at the site, plus proximity to the congestion zone and the need to reduce carbon footprint it is madness to do otherwise. | The requirement for car parking spaces in the SPD reflects a desire by the council to balance the needs of car users, local residents and environmental protection and will ultimately be a question of viability. Section 4.9 of the SPD states that basement car parking should be provided subject to the financial viability, therefore the levels of car parking is dependent upon this. The text in this section also states that the implementation of a car pooling scheme will be expected on this site. The SPD also expects new residential units to be built to the BREEAM Eco Homes excellent standard, which aims to reduce the carbon footprint of the development and requires excellent standards of sustainability to be built in. No further changes recommended. | No changes |

**Representor : 134
Mr Brian Londol**

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|-------------------------|---|---|--------------------|
| Queen's Park Station Area - Supplementary Planning Document | Support with conditions | Preferred option 1, is a great improvement on the tower scheme. But why is the high | See changes made to all sections of the SPD referencing the location of the tallest element stating a clear preference for the tallest element at the north eastern corner. Recommend this for a number of reasons: | No further changes |

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| | | <p>corner element now next to the station, rather than on the falcon site, as originally proposed?</p> | <ul style="list-style-type: none"> - it creates the least impact upon daylighting and sunlighting; - creates a landmark gateway to the Queen's Park area; - compliments development planned as part of the South Kilburn Masterplan. - Prevents overshadowing of the courtyard and residential units within the scheme - The residents and traders in the shops and flats on Kilburn Lane will feel less overlooked <p>This will not preclude development at the Falcon site if it can be demonstrated through innovative design that concerns over daylighting and sunlighting and impact on amenity of those on Kilburn Lane can be overcome.</p> <p>No further changes recommended.</p> | |
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**Representor : 135
Mr Chris Willey**

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|---|---|--|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Observations | Level of detail in SPD makes it difficult to appraise the scheme. | <p>1) It is difficult to judge the effect of a 12 storey corner tower on the surrounding streets (north and south of the rail line) from the draft statutory planning document and the board model.</p> <p>2) The mass and ground cover of the development will change the character of the immediate environment from suburban outer inner city to urban, the lower the corner tower the less the impact but the ground cover will remain a major change.</p> <p>3) The public realm gain is difficult to appraise. It looks though it may be so enclosed as to cater benefit on the occupiers of the development but not the surrounding area i.e. it will do little to reduce the strong risk of overdevelopment of an urban site.</p> <p>4) The strong lines of the scheme - essentially horizontal to the street, will conflict with the previous character- and will not necessarily enhance the respectable architecture in Kilburn Lane. Impact from Saalsbury Road may be negative.</p> <p>5) It may be said that the mass brings South Kilburn to Queens Park</p> | The SPD is intended to provide guidelines for development, and is required by PPS1 not to be too prescriptive in design terms such as the style of buildings. Therefore the images in the document are meant to illustrate the scale, massing and layout which any development schemes should adhere to but the final design of any scheme will be expected to be of an exemplary standard and to address the majority of the points raised in your comments. Although the scale and massing proposed in the SPD is different to that of the existing in the Queen's Park area, the benefits are a | No change |

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| | | <p>rather than Queens Park to South Kilburn.</p> <p>6) The loss of a handsome late 19th Century pub is to be regretted.</p> <p>7) The bus way under the overhang is ugly and depressing- Holborn brought to Queens Park.</p> <p>8) It remains lacking in human scale.</p> | <p>comprehensive solutions to the problems highlighted here.</p> <p>No changes recommended.</p> | |
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**Representor : 136
Mr Gareth Coombs**

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|-------------------------|--|---|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Support with conditions | The new proposal seems to be putting people first and considering the difficult issues realistically and sympathetically. A huge improvement. The major concern is provision for traffic 'all of London has a traffic problem' is not an excuse for weak planning and lazy thinking. | The potential number of units that could be developed on this site is, at initial inspection, not predicted by transport consultants to result in a significant impact upon the tube capacity or the local road network. In fact, the development of the site affords the opportunity to rationalise the road layout and to remove the current problematic gyratory system. Any development on this site would also be required to improve the bus interchange facilities and station access. A full Transport Assessment will also be required to be submitted with any planning application which will need to respond to the problems posed by a new traffic layout. No changes recommended. | No change |

**Representor : 137
H Bunn**

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|--|---|-------------------------|
| Queen's Park Station Area - Supplementary Planning Document | Object | It sounds like another excuse for developers to make money, at the expense of the quality of life for the current residents of the area. The traffic in the area is already very bad. The disruption caused by such a development will cause | The council's principle aim is to achieve a viable mixed use development on this site that comprehensively addresses an underused site and provides much needed new housing for Brent residents. In order to achieve this the council needs developers to fund this. The potential number of units that could be developed on this site is, at initial inspection, not predicted by transport consultants to result in a significant impact upon the tube capacity or the local road network. In fact, the development of the site affords the opportunity to rationalise the road layout and to remove the current problematic gyratory system. Any development on this site would also be required to improve the bus interchange facilities and station access. A full Transport Assessment will also be | No changes recommended. |

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| | | problems for years. | required to be submitted with any planning application which will need to respond to the problems posed by a new traffic layout. No changes recommended. | |
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Representor : 139
Mrs Sue Johnson

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|---|---|--|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Object | Does not approve of more housing development as this will lead to further traffic and stress on service infrastructure. | How will it improve the area with more people and more traffic. 44 new flats are to be built on Banister Road, a 30 storey block is due to be developed next to Sainsbury's. Kensal Rise will not be able to cope it is too overcrowded now. There is only 1 GP in Chamberlayne Road and St Charles Hospital is also being closed. Also they are proposing to close A&E at Central Middlesex. We do not need more flats. My husband has lived in Kensal Rise 61 years and my daughter could not go on any housing list. They had to move out of London to buy. Why should we build more houses for immigrants and refugees because they seem to be the only one eligible for housing. | The estimated need for new housing in Brent is 4,625 units per annum (Brent Housing Strategy, 2002-2007) to which a development on this site could contribute significantly towards. This development is intended to help to kick start the regeneration of the South Kilburn estate, which will eventually see the redevelopment of much of the housing stock in South Kilburn estate for both private and social housing which will hopefully go towards creating a more balanced community in this area. As part of the redevelopment of South Kilburn, a new Healthy Living Centre, a new 3 form entry Primary School and community facilities are expected to be provided in the area through Section 106 planning obligations, which will be available for the use of the local community and to the new occupants of any development at the Queen's Park Station site. See changes already made to objective 8 requiring developers to contribute costs towards the provision of new infrastructure such as schools. No further changes recommended. | No change |

Representor : 141
Mr Malcolm Nash

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|---|---|--|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Object | The area already suffers appalling road congestion. The proposed development will worsen that congestion. Inadequate thought has been given to this issue and no road | Section 4.8 refers to Transport & Access and blythely states that "The rearrangement of the roads should not significantly increase road traffic congestion...". No evidence is given to support this claim and no information is given as to how roads might be redeveloped or | A full Transport Assessment will be required to be submitted with any planning application which will need to respond to the problems posed by a new traffic layout. This level of detail is dealt with at planning application stage, although initial work | No change |

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| | | layout changes or improvements are proposed to mitigate this increased congestion. The proposal should therefore be rejected until a comprehensive road improvement programme has been developed and approved. | reconfigured to reduce the congestion that will inevitably worsen due to the closure of the road that currently passes through the centre of the site. This area already suffers from very bad congestion and the proposed development will increase the volume of traffic in the area and thus the level of congestion will also worsen. | looking at acceptable layouts to accommodate the bus and road networks was the starting point of this SPD, and transport consultants gave initial views on the proposed site layouts considered. No changes recommended. | |
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**Representor : 142
Mr Robert Budwig**

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recommendation | Outcome |
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| Queen's Park Station Area - Supplementary Planning Document | Support with conditions | Overall supports the idea of development on the site and preferred uses. However, believes the scheme should be designed differently to enhance & extend village feel from Salusbury Road. | In general, I am pleased to see a scheme that is less high than the original proposal. However, would it be possible to look at an alternative scheme where the whole development was looked at as an extension of the 'village feel' of Salusbury Road, which apparently is what South Kilburn area lacks? It is vital to remember that in the design of this new scheme, long-term effects of a cold and large structure could be completely detrimental to the purpose of this development. Why not do 5 storey high victorian mansion block with eco friendly roof & solar panels? and perhaps on the island you could do a more contemporary piece in glass, steel etc. The great quality for Londoners in future is to build on the 'village' theme and help create more community spirit not to build large structures that are later regretted. I am all in favor of the idea of developing the site and lots of cafes, shops and restaurants for the local community. Not in favor of more than 25-30car parks. | In light of the location of the SPD site adjacent to the key transport node of Queen's Park Station, with a public transport accessibility level (PTAL) score of 6 which is high, the significant costs associated with assembling the site and their impacts upon viability, it is believed that 12 storeys on a small part of the site is an appropriate height for development at this site. In addition to this, 12 storeys on part of the site allows the majority of the site to be developed at 4 storeys, which is sympathetic to the more sensitive parts of the site along Kilburn Lane and Claremont Road. The issue of car parking is also dependent upon viability. Therefore no changes to the SPD are recommended. | No change |

Representor : 90
 Georgie Cook
 (Thames Water Plc)

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|-------------------------|--|---|------------|
| Queen's Park Station Area - Supplementary Planning Document | Support with conditions | <p>Page 5, 2.1</p> <p>This sets out the purpose of the SPD and bullet point 5 says it will be used in consideration and determination of future planning applications in this area. The water and wastewater infrastructure capability would have to be reviewed once more detail is known with regard to the demand from the developments. With respect to this the following comment needs to be made:</p> <p>'Developers will be required to demonstrate that there is adequate water supply and sewerage capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water infrastructure.'</p> <p>The development should not connect surface water drainage to the sewerage system, surface water should pass direct to watercourse or surface water retention would be required.</p> <p>In addition to the above, where there is the requirement to contribute to the upgrading of utilities infrastructure it should be stated that up to a three year lead in time is needed for provision of extra capacity to supply and drain new development sites. If any large engineering works are needed to upgrade infrastructure the lead in time could be up to five years and the process to implement new treatment works or reservoirs could take between eight and ten years. This in addition to the policies stated in PPS12 paragraph B6-B8.</p> <p>Page 17, 4.1</p> <p>Thames water supports the water efficiency objectives around water recycling and minimising water taken from the mains.</p> <p>Page 31,</p> <p>This refers to the information that should be submitted with planning application. Thames Water consider that the following bullet points should be added to the list:</p> <ul style="list-style-type: none"> - information which should be supplied with the planning application. We must get something in here about a drinking water and waste water strategy including. - information to show what the demand networks will be as a result of the development, - Evidence to show that capacity is available within the existing network to serve the development. Where capacity isn't available a strategy to show how the necessary infrastructure will be provided in | <p>Bullet point 6 of section 5 of the SPD requires "an assessment of the impact on utility water and wastewater infrastructure" which addresses the majority of the concerns raised.</p> <p>No changes recommended.</p> | No change. |

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| | | time to prevent low/ no water pressures or sewerage flooding. | | |
| | | Thames Wter published and circulated in 2004 to all LPA's in our area a 'Guide for LPA's on Planning Application & Development Plan Consultation with Thames Water Utilities as Statutory Water and Sewerage Undertaker'. This will be of assistance to when determining which planning applications to consult Thames Water on and when finalising your LDF. | | |

Representor : 144
Will Mowat

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|-------------------------|---|--|---|--------------------|
| Queen's Park Station Area - Supplementary Planning Document | Support with conditions | Generally in favour of the proposed development so long as it is properly managed once built. Tall element not unreasonable at 12 storeys. Very much in favour of getting the existing but unused rail passenger footbridge extended the last few yards to provide a genuine bus/rail passenger interchange at very little cost but great public benefit. | <p>Given the intention of LB Brent to make something of the QPSA, the desirability of making sense of the rather disparate nature of the surrounding environment, and the need to curb the dominance of vehicular traffic in that area, the development as proposed makes sense, provided:</p> <p>a) The design is not a monolithic block simply dumped there;</p> <p>b) The proposed courtyard and the residential zones are ACTIVELY managed ROUND THE CLOCK by humans on the ground (not just CCTV);</p> <p>c) The proposed bus interchange is intelligently designed to be human-scale, where passengers are treated with dignity (i.e. not kept waiting like cattle in the wind and rain). The horror of a Euston Station-type bus interchange must be avoided at all costs.</p> <p>My feeling is that the taller element (ideally less than 12 storeys, though 12 is not unreasonable) should indeed be kept away from Kilburn Lane and Claremont Road, and thus should be sited at the NE corner of the development, i.e.by the bridge.</p> | <p>The SPD requires that any development should attempt to link the areas north and south of the railway.</p> <p>See changes made to all sections of the SPD referencing the location of the tallest element stating a clear preference for the tallest element at the north eastern corner. Recommend this for a number of reasons:</p> <ul style="list-style-type: none"> - it creates the least impact upon daylighting and sunlighting; - creates a landmark gateway to the Queen's Park area; - compliments development planned as part of the South Kilburn Masterplan. - Prevents overshadowing of the courtyard and residential units within the scheme - The residents and traders in the shops and flats on Kilburn Lane will feel less overlooked <p>This will not preclude development at the Falcon site if it can be demonstrated through innovative design that concerns over daylighting and sunlighting and impact on amenity of those on Kilburn Lane can be overcome.</p> | No further changes |

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| | | | <p>Many people support the idea of integrating the station with the bus interchange. This can be done EASILY and CHEAPLY by coercing/encouraging the rail authorities/companies to EXTEND THE EXISTING YET CURRENTLY UNUSED PASSENGER FOOTBRIDGE, which already straddles almost the entire width of the railway lines (Silverlink and mainline). This bridge could easily be slightly widened as well, covered and brightly lit. Following its current line, the bridge is directly in line with the present station car park, i.e. it would INTERFACE DIRECTLY WITH THE NEW DEVELOPMENT. Using this bridge would allow people to walk under cover straight to the station without being forced back onto the road bridge. If the railways decide to develop the station, that would be an added bonus, but is unlikely to happen anytime soon. Adding a few more yards to the existing footbridge, however, could be done now for pennies by comparison.</p> <p>Last point: far better that higher-density development take place on brownfield sites such as this than on school playing fields or in the green belt.</p> | <p>No further changes recommended.</p> <p>It is stated that the council will expect any proposals to be of exemplary design standards and an architectural competition will be run to ensure that the final design for the site is of an innovative and exemplary standard.</p> <p>As part of the stakeholder group discussions last year the council looked into whether it was possible to get Queen's Park station redeveloped, however the level of development likely to occur on this site, will not generate significant enough monies through Section 106 planning obligations to allow station redevelopment. However the redevelopment of South Kilburn may generate, through Section 106 agreements, a significant amount of money for transport improvements which can be put towards improving the station. The SPD expects the provision of a second access to the station from the north of the development site as shown in figure 4, which is felt to be an achievable improvement in terms of station access from this development alone.</p> <p>The location of residential units above the courtyard will provide natural surveillance in the area.</p> <p>No further change recommended</p> | |
| 1 Executive Summary | Support | Thumbs up. Keep the intellectual quality high. Remember: Cities Are For People. | <ul style="list-style-type: none"> • Key 'gateway' to the borough of Brent, no less! • The aspirations and guidelines are far more acceptable in terms of human scale than the now-discredited 'Genesis tower'. <p>I have no opinion regarding the siting of the 12-storey highpoint. I have no objection to 12 storeys as a maximum.</p> <ul style="list-style-type: none"> • The courtyard must be designed not to allow loitering by undesirable elements, not should it be allowed to become a windswept, litter-strewn, unhappy barren space. | <p>Comments are noted. Architectural competition for the site intended to ensure design is innovative and of exemplary standard, and will be required to be designed to "secured by design" standards, which aim to design out crime.</p> | No changes |

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| | | | <ul style="list-style-type: none"> • I would welcome an innovative and bold design to the whole complex, yet it must remain 'organic' in feel. So, no mirrored glazing. Materials must be low-maintenance, e.g. use natural-finish galvanised steel for balconies, etc. instead of painted finishes that depend on regular re-painting (which is never done!). • Re bus stops: we MUST AVOID the Euston Station syndrome, where buses pull into a bleak, alien, dirty and unfriendly area where humans feel totally unwelcome. Mass transit must be made attractive to people who till now have avoided it precisely because it's seen as third class for fourth class people. So, high priority for human-scale, friendly waiting spaces please. • To mitigate the lack of a proper interchange with the station, I would like to propose that the walkway between the station and the development (over the bridge) be covered to create a weatherproof, friendly 'halfway' interchange between the two. • Traffic planning: I welcome the removal of yet another, old-fashioned gyratory from the streets of London. Cars must not be given priority over other modes of locomotion (walking, cycling). Please consult with the London Cycling Campaign's local group for user-input. | | |
| 2.1 Purpose of the SPD | Object | | "...innovative, high quality and sustainable design": please stop using the word "sustainable" unless you know what it means and tell us what you think it means. As it stands, the term is meaningless and vacuous. | The term sustainable in this instance means the development should be capable of being continued with minimal long-term effect on the environment. It is a term commonly used in national, regional and local planning guidance and a commonly accepted way of expressing the above. No changes recommended. | No change. |
| 2.4 Objectives of the SPD | Support with conditions | | "...development that is safe and secure, well managed and maintained will be sought." Not only "sought" – it MUST be ensured. The | Recommend altering the wording of objective 10 to read: "development that is safe and secure will be required and the council will also seek to ensure that the development is well managed and maintained." In | Recommend altering the wording of objective 10 |

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| | | | success of the development depends on its ongoing management and upkeep, i.e. don't let the courtyard become another unkempt and blighted urban space. | planning terms it is difficult to dictate management terms etc, therefore the word "seek" is still required. | to read: "development that is safe and secure will be required and the council will also seek to ensure that the development is well managed and maintained." |
| 4.8 Transport & Access | Support | | That link to the station using the defunct footbridge could be a real boon if the railways can be persuaded to play ball. | comments are noted. | No change. |

**Representor : 145
R Gregory**

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|---|--|------------|
| Queen's Park Station Area - Supplementary Planning Document | Object | I am totally opposed to this scandalous and wholly unnecessary project. 80% of Britain is countryside. We need a further 1% of land to satisfy our housing needs. That land should be taken from the countryside. To increase the density of housing in an already grossly overpopulated area is a crime against the people of Brent. | National Government planning guidance directs development to brownfield sites and protects open spaces. This therefore would be contrary to this guidance, no changes recommended. | No change. |

**Representor : 146
Nicola McKilligan**

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|-------------------------|---|--|--|
| Queen's Park Station Area - Supplementary | Support with conditions | I welcome the idea of redeveloping the area but would like a clearer idea of the quality of the development as if it is of low quality and includes | Every attempt will be made to encourage a vibrant and economically successful development, which will be a busy and well-used area by all therefore hopefully will | Recommend that the wording at point 20 in section 6 altered to read: |

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| Planning Document | | pubs and bars this could cause problems. My main concern is safe pedestrian access through the courtyard 24hrs, the area is currently known for drug taking and I am anxious that the courtyard will provide a place for dealers to congregate. The pedestrian access through the courtyard will need to be well lit and open all night to serve the tube and the night bus. I think the large number of takeaways on Kiburn Lane and the bus traffic will make the flats difficult to sell/rent and could lead to the flats becoming a grim block of low quality social housing which could be a disaster for the area. | not become a neglected area with their occasional associated social problems. The measures included in the safety and security section aim to ensure that these issues do not arise and requires standard 'secured by design' measures which seek to design out crime. Any proposals for the site will be expected to create a well lit, safe and attractive pedestrian environment. Also, given the constraints of the site and the resulting issues of viability the council is prepared to accept less than 50% affordable housing on this site, which is highlighted in the SPD. The final development would be expected to create an attractive well lit environment the hours of opening required by the SPD are between 6am and midnight. In order to ensure these hours are the minimum amount of time that the courtyard is open to the public it is recommended that the wording at point 20 in section 6 altered to read: "public access to the courtyard at a minimum of between 6am and midnight" | "public access to the courtyard at a minimum of between 6am and midnight" |
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**Representor : 147
A.W. Jennings**

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|---|---|--|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Object | Concerns raised over increased density and infrastructure capacity of the area. | Opposition to the proposed development is first and foremost based on the projected increase in population, in what is already an area of very high density, destined to become more so having regard to the adjacent housing schemes in Kilburn Lane and proposed Ladbroke Green plan. The increase in the number of households would inevitably lead to more traffic congestion in Salusbury Road, which should immediately be made a no-parking thorough-fare. Of great benefit, as a major feature of any development would be a multi- | In terms of the concerns raised regarding the potential overcrowding of the Queen's Park area in particular the traffic along the already busy Salusbury Road, the capacity of the tube system and roads has been taken into account when developing this draft SPD. The potential number of units that could be developed on this site is not predicted by transport consultants to result in a significant impact upon the tube capacity or the local road network. The other developments in the local area mentioned and any proposed development on this site will be required at application stage to fully assess the transport impact of the development and would be required to mitigate any significant impacts. In fact, the development of the site affords the opportunity to rationalise the road layout and to remove the current problematic gyratory system. Any development on this site would also be required to improve the bus interchange facilities and station access. The SPD requires car parking to be provided on site which would be for residents and also reprovide the existing public car parking on the site. This development will also help to kick start the regeneration of the South Kilburn estate, which will eventually see the redevelopment of much of the housing | No change |

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| | | | storey car park for the use of travellers taking the tube trains at Queen's Park. Serious planning for enhanced local community facilities is essential, in the light of increased numbers of residents projected. | stock in South Kilburn estate for both private and social housing which will hopefully go towards creating a more balanced community in this area. Overall in terms of infrastructure see changes made to objective 8 requiring developers to contribute towards the costs of local infrastructure such as schools. No further changes recommended. | |
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Representor : 148
Miss Vivien Kelly
(None)

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
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| 1 Executive Summary | Support with conditions | This is a massive improvement on the original 26 storey proposal for this site so thanks to the council to responding to the community's concerns. I am still a bit worried by the density of housing on this site but as long as the design is good and the residents have a sense of ownership over the building (as has been developed in the flagship flats on Albert Rd) then hopefully a sense of community will develop. | An architectural competition is planned to be held in order to secure exemplary and innovative design solutions for the site. No changes recommended. | No changes. |

Representor : 149
Mrs Wiesia Kelly
(None)

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|-------------------------|---|---|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Support with conditions | This is much better than the previous proposal and I am very glad that we now have a 12 storey height cap. My main concern going forward is the proposed tunnels in and out of the courtyard. I am a pensioner and can think of no tunnels anywhere in London which are not daunting to enter alone, badly maintained and downright dangerous at night. So I hope that you will try and design tunnels which will be safe and clean and failing that at least provide a well-lit walkway around the building as an alternative. | Every attempt will be made to encourage a vibrant and economically successful development, which will be a busy and well-used area by all therefore hopefully will not become a neglected area with their occasional associated social problems. The measures included in the safety and security section aim to ensure that these issues do not arise and requires standard 'secured by design' measures which seek to design out crime. Any proposals for the site will be expected to create a well lit, safe and attractive pedestrian environment. No changes recommended. | No change |

Representor : 151
Mr Norman Home

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|---|--|------------|
| Queen's Park Station Area - Supplementary Planning Document | Object | I notice the ominous phrase that "some bus routes may have to be re-routed". Please do all you can to retain Kilburn Lane as the route for the No6. and 316 buses. It will be little use to residents if you build some state of the art complex as you've described, if we can't have easy access to bus transport, and if you make travel more difficult! | Section 4.8 of the draft SPD states that the new road layout has implications for the bus routes which currently run through the site. However a satisfactory arrangement has been agreed with Transport for London which enables all the current bus routes to continue to serve Kilburn Lane, the new bus stops would be along Kilburn Lane, with only the no. 36 bus travelling round to the north of the site to terminate adjacent to the station. Therefore the level of service for these buses will not be affected by any proposals on this site. No changes recommended. | No change. |

Representor : 152
Mr Robin Sharp

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---------------------|--------------------|---|---|-----------|
| 1 Executive Summary | Observations | The main objective should be comprehensive re-development of the whole site integrated with the major train/underground station adjacent to it, involving a mixture of residential, shopping and office units that will be viable in the long term, socially, environmentally and economically. It has to be recognised that the railway lines form a big divide and that the development will primarily serve the South Kilburn community, not Queen's Park. For that reason it should have been part of the South Kilburn plan. It is not clear that a courtyard plan with very high density of residential inhabitants will be viable. Are the lessons of S Kilburn being learned? That should have lasted 100, not 30 years, and was the result of short-termist Treasury-driven policies. Long term quality comes at a price - affordable housing cannot be cheap. | The objectives in section 2.4 seek to achieve these points, however the development does offer the opportunity to increase integration between the north and south of the railway and could attract visitors from Queen's Park who previously would not have ventured to the south of the railway, which is what the SPD is attempting to promote in any new development. The Queen's Park station site does fall within the South Kilburn New Deals for the Community (NDC) area and is taken into consideration as part of the masterplan area and is included in the South Kilburn SPD adopted in 2005 where it is illustrated as a site suitable for between 10 and 20 storeys. This SPD overrides the South Kilburn SPD for the sites covered by this new SPD. The SPD requires high the building to be built to Eco Homes Excellent standard, include 10% renewable energy sources and be of a high level of sustainability. Some initial viability work on the level of development promoted in the SPD, and it is believed that a development should be viable and achievable as set out in this SPD. No changes recommended. | No change |

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| 2.2 Background | Observations | I was not opposed to a significant residential tower as previously proposed provided the architecture was of high quality and a viable scheme for the type of households to be provided for was worked out, along with relevant social provision close at hand. The site is suitable for higher densities and for the small households of retired people and commuters. | Comments are noted. An architectural competition will be held to ensure that the quality of design is innovative and exemplary. See response to Hyde/Bellway/Taylor Woodrow on housing density. | No change. |
| 2.4 Objectives of the SPD | Object | The mix of tenure has to work in the real world, not just to be politically correct. Affordable housing is urgently need but requires more public subsidy than appears to be available because of high land costs. While the 3-dimensional drawing shown in the draft is not a plan it does look very massive. Surely it will be hard to achieve light at both ends of the flats, especially in the corners if anything like this is proposed? | <p>Mixed tenure housing development is an accepted method of securing affordable housing from private developments, the proportion of private to social units will ultimately depend upon the costs associated with assembling the site and viability.</p> <p>The drawings in the SPD are illustrative only of the scale and massing expected on the site, the council expects any application to come up with design solutions to address such concerns in any planning application. In terms of daylight in the residential units, the siting of the tallest element at the north eastern corner of the development would create the least disturbance in terms of shadowing within the development and in the surrounding streets. A full daylight and sunlight assessment will be expected to be submitted with any planning application which will be expected to demonstrate that units have adequate natural light. No changes are recommended.</p> | No change |
| 4.2 Design Principles | Observations | The issue is whether the courtyard will be open enough and have enough sunlight to be an attractive part of the public realm. It is not clear how much shade and for how many hours per day of sunlight will cover both the windows of the flats and the open space. A couple of smaller towers might help instead of the very massive structure envisaged. The inner corners look particularly dark and hemmed in. | The drawings illustrating the scale, massing and layout expected on the site are indicative only, and any proposals will be expected to be exemplary and innovative in terms of design. A full daylight and sunlight assessment will be expected to be submitted as part of any planning application for this site. The council expects any application to address issues such as this through innovative design. No changes recommended. | No change |
| 4.3 Uses | Object | The residential densities envisaged are the heart of the matter. Surely the SPD should specify the upper limit of density for the whole site and indicate roughly the number of flats which are envisaged. A range of 200-700 is very wide and the upper end is only suitable for households without children of say 2+. 370hrh is about the top end for residential schemes for ordinary families, e.g. Coin Street. It should also be made clearer what the financial constraints are on more affordable housing so that the public can understand the real Treasury policies underlying the challenges faced by the Council and any developer, public or private. The danger is to sacrifice quality (ie cost) to meet artificial targets. This may work in the short term but the South Kilburn estate is a glaring example of it not working in the long term. | <p>Agreed that SPD should clarify the acceptable densities on this site. Recommend that the following wording is added at the second paragraph of section 4.3 to read: "In view of the site's excellent public transport accessibility and proposed transport improvements the council will consider densities in excess of these guidelines given exemplary design standards, layout and level of sustainability."</p> <p>The SPD recognises that the level of affordable housing will ultimately be a question of viability, especially in light of the potential difficulties and costs associated with developing this site in the fourth paragraph of section 4.3.</p> <p>No changes recommended.</p> | Change made as indicated |

Representor : 153
Mr Simon Kendall

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|--|--|--|------------|
| Queen's Park Station Area - Supplementary Planning Document | Object | Still to high. Huge self contained complex out of place in the area. | <p>Twelve stories is still too high in this area. The existing nearby tall buildings do nothing at all for the area and another 12 story building creeping closer to Queens park just puts another blight on the skyline.</p> <p>The design outline as currently illustrated makes this huge complex look like a totally self contained mass of accomodation that is a world of its own rather than integrating with or standing any chance of improving the character of the area.</p> <p>Unfortunately it looks like a huge deco style project from decades past rather than London in the 21st century.</p> | <p>In light of the location of the SPD site adjacent to the key transport node of Queen's Park Station, with a public transport accessibility level (PTAL) score of 6 which is high, the significant costs associated with assembling the site and their impacts upon viability, it is believed that 12 storeys on a small part of the site is an appropriate height for development at this site, as Government policy promotes high density development in areas of good public transport accessibility. In addition to this, 12 storeys on part of the site allows the majority of the site to be developed at 4 storeys, which is sympathetic to the more sensitive parts of the site along Kilburn Lane and Claremont Road. This option has also been arrived at in consultation with the community and stakeholders and it is felt that the heights proposed in this document have reflected the local community's concerns whilst working within the various constraints of developing the site. This allows a high quality development, where high quality landscaping will be promoted and wider pavements are promoted (see section 4.7). A full sunlight and daylight assessment will be required as part of any planning application, and development will be expected to minimise shadow and maximise sunlight penetration.</p> <p>The SPD is intended to provide guidelines for development, and is required by PPS1 not to be too prescriptive in design terms such as the style of buildings. Therefore the images in the document are meant to illustrate the scale, massing and layout which any development schemes should adhere to but the final design of any scheme will be expected to be of an exemplary standard and an architectural competition will help to ensure this.</p> <p>No changes recommended.</p> | No change. |

Representor : 154
Mr Norman Wilson
(Stop the Tower Start the Park)

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recom | Outcome |
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| Queen's Park Station Area - Supplementary Planning Document | Support | We represent a lot of Westminster residents, who said they wanted a scheme similar to the proposal. The courtyard design is a good one. If we don't agree to something Ken Livingstone might lumber us with something worse! | The SPD is in line with the objectives of Stop the Tower/Start the Park. Several dozen of our neighbours and others from further afield signed up for these objectives and the same several dozen also signed up for my wife and I to represent them on the Stakeholders' Forum . The only difference from our original proposal is that it is now proposed that building is to take place along all four edges of the site, rather than just one or two. This is a definite and considerable improvement, as this gives rise to a very quiet and peaceful courtyard, if it is sympathetically done, as it cuts out traffic noise, and fumes &c. The proposed height is also definitely not a problem as anyone who has seen similar developments will surely testify. Once you are in the middle of that kind of peaceful haven, even quite high buildings are not oppressive. It is, I believe, also intended that there will be a budget for 'beautification', which in this case will probably consist of mature trees. It has also been pointed out by the newish leader of Brent Council at a public meeting towards the end of 2006 that, if Brent do not approve the new SPD, Ken Livingstone has the power to impose what he sees fit. | Comments are noted. | No change. |

**Representor : 156
Ms. Zoe Cokeliss**

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|---------------------------|---|---|--|----------------|
| Queen's Park Station Area - Supplementary Planning Document | Support with conditions | Great improvement, but have some reservations - hope that these can be addressed with careful planning and consideration of locals' opinions. | <p>I am pleased to see that the new proposal, with its height cap of 12 storeys at the highest point, is a great improvement on the previous tower proposal. I am also heartened by the emphasis placed on the development being sustainable - see the BedZed development in south London for a good example of a residential and office complex that is carbon-neutral.</p> <p>However I strongly feel that the highest point of the development should NOT be at Queens Park Station but instead should be at the Falcon site (or at the point that is geographically lowest, thus reducing overall height as much as possible). Placing the highest point of the development at the station would feel oppressive and out of character with the Salusbury Road area.</p> | <p>See changes made to all sections of the SPD referencing the location of the tallest element stating a clear preference for the tallest element at the north eastern corner. Recommend this for a number of reasons:</p> <ul style="list-style-type: none"> - it creates the least impact upon daylighting and sunlighting; - creates a landmark gateway to the Queen's Park area; - compliments development planned as part of the South Kilburn Masterplan. - Prevents overshadowing of the courtyard and residential units within the scheme - The residents and traders in the shops and flats on Kilburn | No change |

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| | | | <p>I am also concerned about the nature of the courtyard within the development, and feel strongly that every effort should be made to ensure that this is safe for pedestrians to pass through at all times of day and night, and that it does not become the equivalent of existing unsafe atmosphere on the car park site.</p> | <p>Lane will feel less overlooked</p> <p>This will not preclude development at the Falcon site if it can be demonstrated through innovative design that concerns over daylighting and sunlighting and impact on amenity of those on Kilburn Lane can be overcome.</p> <p>Also the majority of respondents that have raised a preference have supported development at the north eastern corner.</p> <p>Every attempt will be made to encourage a vibrant and economically successful development, which will be a busy and well-used area by all therefore hopefully will not become a neglected area with their occasional associated social problems. The measures included in the safety and security section aim to ensure that these issues do not arise and requires standard 'secured by design' measures which seek to design out crime. Any proposals for the site will be expected to create a well lit, safe and attractive pedestrian environment. No changes recommended.</p> | |
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**Representor : 157
Mr Steve Hilditch**

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recommendation | Outcome |
|------------------------|--------------------|--|---|--|------------|
| 1 Executive Summary | Support | We must grasp the opportunity for more decent affordable homes in the area whilst also making sure that the scheme is of the highest possible quality. | <p>The need for more decent and especially affordable homes in the area is huge - so this scheme is very welcome. Building higher density developments next to good public transport like this makes a lot of sense. The rejection of the tower block means that the scheme is more squat and massed, but that is the inevitable outcome. I think the highest point should be greater than 12 storeys to get more value and to fund a higher share of affordable homes. It wouldn't harm anyone to do this.</p> <p>The area south of the station is currently very unpleasant and unsafe. The scheme has a lot of potential to bring the area to life and create a new community focus with safer streets and new retail & leisure facilities for everyone. The site should have 50% affordable housing so it meets community needs. Proposals to</p> | <p>The SPD requires 50% affordable housing to be provided, although recognises that the physical constraints and costs associated with land assembly may impact on viability, therefore it may accept less than this if it is demonstrated that this is not viable.</p> <p>The level of car parking provided within the scheme will ultimately be dependent upon financial viability.</p> <p>No changes recommended.</p> | No change. |

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| | | <p>have a car club are welcome and consideration should be given to minimising car parking on site due to excellent public transport. Local concerns about pedestrian access from Kilburn Lane to QP station will need to be addressed constructively.</p> <p>Well done local councillors and Karen Buck MP for making sure those of us living on the Westminster side have now been properly consulted.</p> | | |
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Representor : 158
Mr Michael Lyon
(Private individual)

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|--|--|---------------------------|
| Queen's Park Station Area - Supplementary Planning Document | Other | <p>My family and I are resident in the local area, and we use local shops, school and other amenities close to the site. I am also a former member of the Council's Executive, and in that capacity I note and uphold the principles in the Council's original supplementary planning brief for this area adopted following public consultation.</p> <p>Comments</p> <p>1 I support the general principle that the whole site is appropriate for a mixed use including an appropriately high density of housing, of a commercial scale sufficient to enable significant public realm benefits to be achieved, and to the highest standards of design in order best to address the prominence and sensitivity of the site.</p> <p>2 An appropriately high density of housing including provision for affordable housing is the necessary and right policy when demand for housing in London is so severe. This is reflected locally in property prices in Queen's Park.</p> <p>2 Siting new development on this site is also right from the environmental perspective in that (i) it relieves pressure to develop on green field and green belt sites; and (ii) the exceptional public transport access means that the impacts of greenhouse gas emissions and road congestion in London will be minimised.</p> <p>3 I support, so far as they go, the proposed uses under the 'commercial'</p> | <p>In response to your support for a replacement library on this site, it is very unlikely that the current proposals for restructuring the libraries would promote moving the Salusbury Road library to this site.</p> <p>In terms of the provision of basement car parking, the requirement for car parking spaces in the SPD reflects a desire by the council to balance the needs of car users, local residents and environmental protection and will ultimately be a question of viability. Section 4.9 of the SPD states that basement car parking should be provided subject to the financial viability, therefore the levels of car parking is dependent upon this.</p> <p>In response to point 7 of your letter we agree that development must support the major regeneration of South Kilburn and this is highlighted as the primary objective of this SPD in the Executive Summary. In order to emphasise this we recommend the addition of a bullet point in section 2.1 with the following wording: "To help facilitate the wider South Kilburn redevelopment but to allow development that is independent of these proposals."</p> | Changes made as indicated |

and 'community facilities' headings in section 4.3.

4 I would go further, however, and advocate that the site should also be considered for 'cultural use', by which specifically I suggest that this is an excellent opportunity to consider a replacement library for Kilburn Library, Salusbury Road. The Council's strategy on libraries recognises that many smaller branches require improvement, but in the face of resource constraints the policy has been to take advantage of suitable opportunities as they arise. Kilburn Library is a prime example of a much-loved local library that badly lacks for space. While any decisions on the Council's libraries will depend on resources, and constraints such as political will and imagination and other factors outside of the scope of this SPD, I do believe that the planning brief should preserve the option of a library use at this site given its size and unique convenience both to south Kilburn and north Kilburn / Queens Park residents.

5 I support the objectives for enhancing walking access, improving bus stop positions and bus turn around roads and for losing the gyratory aspect of the present layout.

6 I most strongly oppose the suggestion under 4.9 to include basement (or any other on-site) parking other than for disabled needs and as a limited quantity of replacement visitor parking. If any new residential development should be appropriate for a non-car policy, then this must be it. Indeed not to insist on a non-car development will deprive the many Londoners who do not wish to depend on private car ownership of the choice of such sustainable accommodation. It would be a complete contradiction of the very strong sustainable environmental arguments in favour of this site.

7 Any development must support the major regeneration of South Kilburn, and not merely "take account" of this. That is to say, decisions on height or other aspects of the SPD must not be allowed to impose unwanted constraints on the South Kilburn plans.

8 On one issue that has not featured in the draft or in the public consultations, I should like to propose that the brief should ensure that in any new development the view of the modern spire – i.e. the cross - of St Luke's Church (Westminster) should remain visible to pedestrians on the stretch of Salusbury Road on the police station / Kilburn Library side in that region. At present it appears above either the carriage way or the Falcon pub depending on vantage point. This means, correspondingly, that to the extent that this condition would form a constraint, it would affect just that part of the site only. Preserving such a view would add to

Directing the tallest element of the development to the north eastern corner of the site should have the least impact upon the view of St Luke's church spire. See other comments and changes made to SPD stating a clear preference for the location of the tallest element at the north eastern corner of the site.

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| | | wider public amenity whether that be in the form of architectural appreciation (or simply, 'public art'), enhancing access to a community facility, in this case the place of worship, or of spiritual uplift. | | |
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Representor : 160
a resident of albert road

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|--|---|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Object | <p>I have come to 2 meetings to get information on the SPD, and my feeling is that the project is too big for the area. The building is very big for the space involved and I feel that it will be overwhelming, in its size itself (living in Albert Road, I would be literally surrounded by blocks if this project was to be accepted) and also too big in relation to the high number of people who would live there. Queens park has a lovely "village feel" and it would be a real pity to loose this. It is one of London's pleasures to have kept this village feel in some areas and I feel that it is important to keep it, for the quality of life and well-being of residents, but also because it makes it a safer area to live in. This project worries me a lot because of overcrowding. Many small blocks are going to be built in Albert road as part of the South Kilburn Regeneration Plan. With this new building as well, the density of the area will be very high, which leads to overcrowding, more crimes, too many cars etc...I also thought that it has been realised that high blocks are not good housing, I have lived in Bronte House, a 16 storey block for 16 years and I did not feel safe living there. The South Kilburn Regeneration Plan involves demolishing as many high blocks as possible and building small blocks, because it is better for everybody. Building a 12 storey high block is in contradiction with the plan for the area! I understand that the Queens park Station Area needs regeneratong and that accomodation is needed. I would like to see a smaller building being built there, with a maximum of 6 storey. It would make it possible to keep the village feel of Queens park, it would be in proportion with the area involved and it would be in line with the South Kilburn Regeneration Plan. I am very happy that the original plan of a 26 storey block has been rejected. However, I feel that it is not a reason for accepting any plan now!</p> | <p>In light of the location of the SPD site adjacent to the key transport node of Queen's Park Station, with a public transport accessibility level (PTAL) score of 6 which is high, the significant costs associated with assembling the site and their impacts upon viability, it is believed that 12 storeys on a small part of the site is an appropriate height for development at this site, as Government policy promotes high density development in areas of good public transport accessibility. In addition to this, 12 storeys on part of the site allows the majority of the site to be developed at 4 storeys, which is sympathetic to the more sensitive parts of the site along Kilburn Lane and Claremont Road. The South Kilburn masterplan (2004) includes the Queen's Park site, and identifies the site as suitable for a development of between 10 and 20 storeys high. This is reflected in the adopted South Kilburn SPD. However this new SPD for Queen's Park will supercede the South Kilburn SPD for the sites covered by it only, therefore this document effectively puts a height cap on any development to 12 storeys and restricts it only to the least sensitive part of the site.</p> <p>No changes recommended.</p> | No change |

Representor : 161
S Arnold

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|-------------------------|---|---|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Support with conditions | There must be a maximum of 12 storey on only 1 site furthest from the station - the Falcon Hotel should be saved and refurbished. Try not to make the same mistakes as the Council made when building one of the worst estates along Carlton Vale - No pedestrians/covered walkways which only invite drug dealing and other crime. | <p>In light of the location of the SPD site adjacent to the key transport node of Queen's Park Station, with a public transport accessibility level (PTAL) score of 6 which is high, the significant costs associated with assembling the site and their impacts upon viability, it is believed that 12 storeys on a small part of the site is an appropriate height for development at this site, as Government policy promotes high density development in areas of good public transport accessibility. In addition to this, 12 storeys on part of the site allows the majority of the site to be developed at 4 storeys, which is sympathetic to the more sensitive parts of the site along Kilburn Lane and Claremont Road. This option has also been arrived at in consultation with the community and stakeholders and it is felt that the heights proposed in this document have reflected the local community's concerns whilst working within the various constraints of developing the site.</p> <p>See changes made to all sections of the SPD referencing the location of the tallest element stating a clear preference for the tallest element at the north eastern corner. Recommend this for a number of reasons:</p> <ul style="list-style-type: none"> - it creates the least impact upon daylighting and sunlighting; - creates a landmark gateway to the Queen's Park area; - compliments development planned as part of the South Kilburn Masterplan. - Prevents overshadowing of the courtyard and residential units within the scheme - The residents and traders in the shops and flats on Kilburn Lane will feel less overlooked <p>This will not preclude development at the Falcon site if it can be demonstrated through innovative design that concerns over daylighting and sunlighting and impact on amenity of those on Kilburn Lane can be overcome.</p> <p>No further changes recommended.</p> <p>The SPD states that development can take place around the existing Falcon pub, but it believes a comprehensive approach will result in a higher quality development.</p> <p>No changes recommended.</p> | No change |

Representor : 162
Lyndsay Milne

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|-------------------------|--|--|--|
| Queen's Park Station Area - Supplementary Planning Document | Support with conditions | As Kilburn Lane long standing residents, flat and shop owners, working from home, and as designers/architects we highly recommend that: the tall section is next to the station; the ground floor is glazed both sides to avoid fortress feel; serious natural landscape involved i.e. roof gardens, trees, water to reflect Queen's Park and have village/community supported and involve, old and young serve old and young in the scheme do not segregate society. That serious money is allocated to any public art proposed - bad art is worse than no art. Please consider Shirazeh Houshiary. Her towers would be great. Lisson Gallery. In scale it smacks of Elephant and Castle and that worries me at the moment. We hope Munkenbeck and Marshall get the commission. | See changes made to SPD, stating a clear preference for the siting of the tallest element at the north eastern corner of the site adjacent to the station. It is agreed that the landscaping of the scheme is important to the success of the development. A comprehensive landscaping strategy will be expected to be submitted as part of any application. Recommend that the following wording is added to the second paragraph at section 4.5: "This approach affords the opportunity for the creation of private and communal roof gardens in the development to serve the residents. These should be maximised in any proposals." | Recommend that the following wording is added to the second paragraph at section 4.5: "This approach affords the opportunity for the creation of private and communal roof gardens in the development to serve the residents. These should be maximised in any proposals." |

Representor : 163
W F Irvine

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|--|--|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Object | 12 storeys is too tall. Every additional storey aggravates bad traffic, crime, congestion problems plus increases pressure on limited local resources. Please restrict to 4 storeys. | In light of the location of the SPD site adjacent to the key transport node of Queen's Park Station, with a public transport accessibility level (PTAL) score of 6 which is high, the significant costs associated with assembling the site and their impacts upon viability, it is believed that 12 storeys on a small part of the site is an appropriate height for development at this site, as Government policy promotes high density development in areas of good public transport accessibility. In addition to this, 12 storeys on part of the site allows the majority of the site to be developed at 4 storeys, which is sympathetic to the more sensitive parts of the site along Kilburn Lane and Claremont Road. This option has also been arrived at in consultation with the community and stakeholders and it is felt that the heights proposed in this document have reflected the local community's concerns whilst working within the various constraints of developing the site. No changes recommended. | No change |

Representor : 164
D Warriman

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|---------------------------|--------------------------|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Support | Do it! | Comment noted. | No change |

Representor : 165
Francis Prideaux

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|---|--|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Other | In view of the enormous need for housing for those on low incomes, can we be publicly reassured that at least 50% of the housing units in any new development on this site are readily affordable for those in this income group? | Given the constraints of the site and the resulting issues of viability, the council is prepared to accept less than 50% affordable housing on this site, which is reflected in the SPD. This is because the overriding aim of the council is to achieve a high quality, sustainable development on this site which helps to kick start the regeneration of South Kilburn. No changes recommended. | No change |

Representor : 166
Julie Power

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|---|--|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Object | The traffic on Kilburn Lane is already a disgrace, many buses use Kilburn Lane and turn at Premier Corner. Have they thought about the impact of extra traffic and the closing of Premier Corner. There needs too be a review about traffic impacts and re-routing the buses. | A full Transport Assessment will be required to be submitted with any planning application which will need to respond to the problems posed by a new traffic layout. This level of detail is dealt with at planning application stage, although initial work looking at acceptable layouts to accommodate the bus and road networks was the starting point of this SPD, and transport consultants gave initial views on the proposed site layouts considered. No changes recommended | No change |

Representor : 155
Mr James Kennedy

| Heading | Nature of | Response / Representation | Officer's Recommendation | Outcome |
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| | Response | | | |
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| Queen's Park Station Area - Supplementary Planning Document | Support with conditions | I am generally supportive of the development of the site, although in a number of circumstances I would prefer that there was no development at all if certain preconditions are not met. The areas of greatest concern to me are: the lack of comprehensive development; insufficient planning for (or recognition of) the needs of the additional residents and how this will impact upon existing services such as schools, medical facilities, transport, parking etc; and the possibility of a building of limited height on this site, but a much taller building on the eastern side of Salusbury Rd (i.e. the British Legion site). These points are developed in greater detail (along with other points) below | Comments noted refer to responses to individual elements below. | changes as indicated in each section |
| 2.1 Purpose of the SPD | Observations | Query whether this can be a framework for comprehensive development when it does not cover the British Legion site and the Station - two parts of the original Queen's Park Station Area brief. Although this change is noted once in the draft, I think it should be made very clear that these two areas have dropped out of consideration and the reasons for this. Many residents would be surprised that this new planning brief/SPD (i) does not cover the station itself and (ii) does not cover the areas on the other side of the road. One of the criticisms of the development of the Station area is that it has been disjointed - and it would be good for "comprehensive development" to include the station and Legion site - or if not to at least clarify to the community what the Council's expectation of development of these areas is. | <p>The SPD explains at point 5 section 2.2 that the station is not included as part of this SPD as it is now considered impractical and unviable.</p> <p>However it is agreed that a fuller explanation in terms of the British Legion site should be provided in the SPD, and recommend further wording is added as point 6 at section 2.2 as follows: "6. That the SPD site can be treated as a separate development site that can come forward for beneficial use regardless of where the wider South Kilburn proposals are confirmed. Thus the British Legion site is dealt with in the South Kilburn SPD and in part here. The council now wishes to relocate the British Legion site into the SPD area this thereby frees up the British Legion site for development that will benefit the rest of the South Kilburn area."</p> <p>A further amendment is recommended in the "status" paragraph to clarify that this SPD and the South Kilburn SPD should be considered guidance for the British Legion site as development at this site is linked to the Queens Park station site. Figure 1 should also be amended to indicate that the British Legion site is a linked site.</p> | Changes made as indicated. |
| 2.2 Background | Observations | Para 2.2 states innocently that the British Legion and Albert Road Day Centre are now only covered by the SKM and the existing SPD. The new SPD document should state clearly what this means, namely, that the planning policy which will apply to these sites will allow a building of 10-15 stories on these sites - on the opposite side of the road to the Station site (see pg 84 of the existing SPD). This is | Recommend the insertion of the following wording to clarify the current guidance for Albert Road day centre and the British Legion sites at section 4.5 as a second paragraph under the current subheading "height": "The South Kilburn SPD allows for residential development of similar heights along the length of Albert Road. However, any building on the British Legion site should be complementary to the height of the higher elements on the station area site. The two sites in combination are important in streetscape | Changes made as indicated. |

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| | | not at all clear and many people would be concerned to know that there could easily be two large buildings on sites either side of Salisbury Road at this point - which of course may well impact on their views on the policy you are asking them about now in respect of one of the sites. | terms, they have a role as an attractive termination of views north and south of Salisbury Road. Any design of the taller element on the car park site should take into account any response on the Albert Road side and ensure that higher development here does not preclude development of a similar scale at Albert Road, particularly as the Albert Road site footprint is more constrained." | |
| 2.4 Objectives of the SPD | Object | In respect of point 2, see my previous comments on paragraph 2.2: not undermining the regenerative proposals for SK is of course a consideration, but if by this the Authors of the draft mean "we should still be allowed to have a building of up to 15 stories on the other side of the road by the station site" then this should be put squarely to the community so they can comment on this. The community needs to know that this is the context of the draft SPD on which they are being asked to comment. | In order to ensure the community are aware of the context of the regeneration at South Kilburn it is recommended that the following wording is added to the end of objective 2: South Kilburn...."as outlined in the adopted South Kilburn SPD." | Recommend that the following wording is added to the end of objective 2: South Kilburn...."as outlined in the adopted South Kilburn SPD." |
| 2.4 Objectives of the SPD | Observations | I would have thought there should be some mention here of ensuring the development does not compromise (but instead enhances) community facilities in terms of schools, medical facilities, transport and parking. There would appear to be no or little recognition in the SPD of one of the issues of greatest concern to the people who already live around Queen's Park, namely, it is going to further stretch amenities/facilities which people already feel are overstretched - and what are the plans to make sure this does not happen? | Recommend the inclusion of additional wording at objective 8 to read: "Ensure new and replacement community facilities and adequate local infrastructure: New and replacement community facilities will be sought as part of the development to address the needs of the local area. In addition to this developers will be required to contribute towards the costs of local infrastructure, such as schools, offsite. This will be achieved through the use of planning obligations." | Changes made as indicated. |
| 4.5 Scale & Massing | Object | I object to a consideration of this development in this location without a consideration of what sort of development is going to be placed on the other side of the road - on the British Legion/Albert Day Centre site. This does not give people sufficient context in which to comment on the development and I consider that many people would be surprised if they were told clear that there could be an additional 15 storey building on the other side of the road. Beside anything else, no matter what the scale and massing it would effectively create a chasm of Salisbury Road just before the bridge. | See changes made to SPD stating a clear preference for the location of the tallest element at the north eastern corner. Agree to change text with the addition of text outlining the relationship between heights and layout on this site and the British Legion site. Also see modification agreed in response to your objection at section 2.2 | Changes made as indicated |

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| | | I also think due consideration should be given to having the higher part of the building at the Southern end - so as not to give it prominence on the hill. | | |
| 4.6 Architectural Quality | Observations | I think the Council should be actively promoting an architecture competition for the site. | An architectural competition is currently in its early stages of formulation and should be run over the next six months. No changes recommended. | No change |

**Representor : 168
Gareth Fairweather
(Transport for London)**

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|-------------------------|---|---|----------------------------|
| Queen's Park Station Area - Supplementary Planning Document | Support with conditions | <p>Thank you for inviting Transport for London (TfL) to comment on the Queen's Park Station Area Supplementary Planning Document (SPD) which was published in draft format for statutory consultation on 23rd November 2006. Overall, TfL supports the broad aims of the document. The main strategic transport issues have been identified below (in bold) with more specific justification provided in turn beneath each of these headline comments.</p> <p>Overview</p> <p>The site is bounded by Claremont Road to the west, Kilburn Lane to the south, Salusbury Road to the east and the Silverlink/Bakerloo railway track to the north. The site is directly served by 5 bus routes (No. 6, 36, 187, 206, 316) and one night bus (N36). Importantly, both the service 36 and N36 terminate on site. The site is adjacent to Queen's Park Underground station and TfL currently owns Premier House, which is within the site, for use by Underground employees. TfL also own the eastern section of the car park. The area has a Public Transport Accessibility Level (PTAL) of 6.</p> <p>Overall, therefore, the interaction of the Underground station, bus routes and terminus and other TfL property means that TfL has a vested interest in the operation of this interchange. Any future development within the boundaries of this site must, therefore, reflect TfL's interests.</p> | <p>It is recommended that all references to the site having a PTAL level of 5 are changed to PTAL level 6.</p> <p>Section 4.3 states that the re-provision of TfL facilities at Premier House are expected to be re-provided within the development. It is recommended that the expectations for this provision is further clarified through the inclusion of the following wording in the paragraph titled "Commercial": "This provision should be funded through the developer and should be located closer to the station than the present location. Temporary facilities should be provided for TfL use during the construction period as appropriate."</p> <p>In terms of parking, TfL's needs are recognised, therefore recommend the following wording to be added at section 4.9: "The council will also seek to provide an appropriate level of car parking associated with any retention of train facilities to allow for crew working anti-social hours."</p> <p>In terms of the second access to the station, we note your support for this provision and the council look forward to working with TfL to achieve this aim. It is recommended that wording about the provision of a second access to the station in section 4.8 should be</p> | Changes made as indicated. |

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| | <p>General Development Principles</p> <p>Due to the site's beneficial proximity to local transport services TfL would expect any new development to take full advantage of this. Therefore, TfL suggest that the area is well suited to high density developments, in accordance with Policies 3C.1 'Integrating transport and development' and 3C.2 'Matching development to transport capacity' of the London Plan. The broad development principles (particularly regarding density) within the SPD are therefore welcomed.</p> <p>The assessment of the role of sustainable transport within the SPD is supported, being in line with Policy 3C.3 'Sustainable transport in London' of the London Plan. TfL supports and encourages walking, cycling and public transport use.</p> <p>TfL expects all parking standards to be in accordance with those mentioned in the London Plan (Annex 4) and the London Cycle Network's parking standards. Encouraging cycling is one of the Mayor's key strategic objectives for London so opportunities for cycle parking, cycle use and cycling facilities (safe and secure) is supported.</p> <p>TfL Property - Premier House</p> <p>TfL currently provide train crew accommodation and operational facilities within Premier House. The future operation of this building for these purposes is therefore of significant importance to TfL. If the comprehensive redevelopment of the site is to include the demolition of Premier House, TfL expect replacement train crew accommodation and operational facilities to be provided by the developer at no cost to TfL. This should be of a better standard and should be located closer to the station than at present. As this accommodation is in 24 hour operation, TfL will require temporary facilities to be provided by the developer during the construction of any new accommodation. An appropriate level of car parking should also be provided for use by train crew utilising the facilities at night. Any other costs involved in the relocation of this facility should be covered by the developer.</p> <p>Queens Park Underground Station</p> <p>The SPD makes specific reference to the development of a second point of access to Queen's Park Underground station. TfL expect this to be developed as part of any proposal for the site with the view that it would increase the overall permeability of the area. No contact has</p> | <p>clarified by removing reference to TfL resources.</p> <p>Comments on the new road layout are noted. Reprovision of facilities for TfL use affords an opportunity for the provision of toilets for TfL staff and the SPD also requires the provision of publically accessible toilets. The SPD also requires any development to be designed to "Secure by Design" standards which addresses concerns raised about the creation of a crime free environment. No changes recommended.</p> <p>Your comments regarding Transport Assessments and Travel Plans are noted. These are both required to be provided in the SPD at section 5 and 6 respectively. S106 requirements include sustainable transport measures and improvements and transport improvements including improved road junctions, second station access and station/bus interchange facilities.</p> | |
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been made with TfL regarding this matter to date. Despite this, TfL look forward to working in partnership with any prospective developer and LB Brent in order to facilitate the development of a second point of access as well as other station improvements. TfL would expect the costs of these works to be borne by the developer(s) through Section 106 contributions. This and other improvements to the station and surrounds may be implemented by use of pooled contributions from this and other developments in the surrounding area.

Revised Highways Layout and Bus Route Diversion

The SPD presents the opportunity to revise the highway layout in and around the site. TfL London Buses is currently in discussions with the developer's architects regarding the diversion of the terminating bus routes 36 and N36. As the current bus standing arrangement along Claremont Road is undesirable, negotiations are underway regarding the re-routing of these services onto a new road between the site and the railway lines (connecting Claremont Road to Salisbury Road) in order to facilitate bus movements anti-clockwise around the developments. TfL must be satisfied that any proposal for the redevelopment of the site provides adequate width for two buses to pass and an appropriate number of bus stands for the terminating routes 36 and N36. TfL will continue to work with the developer and LB Brent in order to reach a conclusion regarding this new connecting road and the operation of buses along it. TfL expect any future development of the site to include the provision of toilet facilities at a convenient distance from the bus stand. Furthermore, any new bus routes and stops should be well lit, secure and provide a crime-free environment.

Planning Applications and Section 106 Contributions

TfL would like to stress that although this draft SPD provides a broad agenda for development within the site, any developer proposing major redevelopment must submit a comprehensive Transport Assessment for consideration by TfL. Only at this point can TfL fully assess and comment on the proposals for the site. TfL has produced a 'Transport Assessment Best Practice Guidance Document' which can be viewed online at www.tfl.gov.uk/transportassessment. Speculative developers should use this throughout the preparation of Transport Assessments. Any Transport Assessment should assess the full range of transport modes and impacts, in particular road, rail and bus demand and capacity, but also a robust assessment and analysis of pedestrian and cycle routes. Provided within any proposals should be

high quality links both within the site, at the station and to support the wider networks. In addition, the wider impacts on TLRN and SRN may be required.

Furthermore, TfL will expect a robust Travel Plan to be submitted alongside all major applications within the site. This should contain realistic and achievable targets in order to encourage more sustainable trips to and from the site. Any travel plan should be secured, enforced, monitored and reviewed as part of any Section 106 agreement. It should clearly articulate the target mode share and trip rates for the site over time and explain how commitment to the supporting initiatives and measures are expected to deliver these targets.

TfL expects any development of the site to facilitate improvements to both public transport and cycling/pedestrian facilities. Section 106 contributions may therefore be requested towards transport facilities and TfL will work closely with the developer to identify and develop options for local transport improvements.

Summary

In summary, TfL generally supports the content of the document, in particular the council's emphasis on sustainable development and innovative design. The nature of the site is, however, very much oriented around transport and TfL would encourage the final SPD to emphasise this in greater depth than it does at present. As a guidance document for prospective developers, TfL would like to see greater emphasis being placed on its role within the site. TfL's interests should therefore be made explicit within the document. Developers should be properly advised of the interests detailed above. This will also ensure that TfL is kept fully involved throughout the development process. Please keep TfL informed regarding the progress of this document from draft to final format.

If you would like to discuss any of the above comments, please do not hesitate to contact me. In the meantime, however, I trust that you will appreciate that these comments represent my own officer level view from Transport for London and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this project. These comments also do not necessarily represent the views of the Greater London Authority, which should be consulted separately.

Representor : 170
Mr. Harley Cokeliss

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|-------------------------|--|--|---|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Support with conditions | It would be sensible to try and transplant those qualities that make Queens Park such a charming and pleasant place to live into the South Kilburn area rather than just plonking down a massive structure on the periphery and hoping for the best. | <p>I support the notion that some of the special aspects of the Queens Park area that make it such a charming and pleasant place to live could migrate into the South Kilburn Redevelopment Area. However to do this it would be sensible to try and transplant those qualities that make the QP area work rather than just plonking down a massive structure on the periphery and hoping for the best.</p> <p>Specifically, for the most part the structures in the Queens Park area are late 19th and early 20th century brick buildings. Why not keep that idiom when considering the look of the Car Park Building? It is a finite area with shops on both sides of the street. Why not continue this 'village' idea when considering how to give the retail units in the Car Park Building a sense of locality? If it is just a run of franchises or monolithic supermarket giants it will have no local quality.</p> <p>The placement of the tower is also crucial. Why put it next to the station? Is that the lowest part of the site? I thought the idea was to put it at the Falcon end of the site to minimize its impact on Salusbury Road. And has no one considered dividing the housing units making up the tower into several smaller stacks at the corners of the sites rather than having one spike?</p> <p>But to me the biggest problem I can see with the 'courtyard' concept is how to prevent it from turning into a wind-blown 'shooting gallery' and muggers paradise at night. It will have to be dark at night because to keep it brilliantly lit to dissuade the unsavoury will probably disturb the residents. It's hard to think of a single example of a successful modern urban courtyard. Hasn't anyone been to the South Bank and walked around the Imax Cinema at night? And that's in the West End. It is instructive to look at earlier urban solutions both here</p> | <p>The SPD is intended to provide guidelines for development and is required by PPS1 not to be too prescriptive in design terms such as design of buildings. Therefore the images in the document are meant to only illustrate the scale, massing and layout which any development scheme should adhere to. The final design will be expected to be of exemplary standard and should address all the issues on the site sensitively.</p> <p>The location of the higher section of the building to the north of the site will prevent overshadowing of the courtyard and residential units within the scheme. The residents and traders in the shops and flats in Kilburn Lane will also feel less overlooked. Therefore as detailed in other responses the council is now minded to recommend that a clear preference is expressed in the SPD that the location of the tallest element of any proposals should be at the north eastern corner of the site adjacent to the station.</p> <p>The SPD requires any development to be built to "Secured by Design" standards therefore it applicants will be expected to design out crime.</p> <p>No further changes recommended</p> | No change |

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| | | | and in Europe. It's clear that the best way to create a safe urban environment is to keep traffic (vehicular and/or pedestrian) flowing through an area and for it to be designed and lit to thwart its use by predators. In London there are many attractive examples of a gated garden at the centre of a traditional square surrounded by housing. Isn't time we learned from what worked in the past rather than making the same urban planning mistakes over and over again? | |
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**Representor : 169
Mrs. Janet Cokeliss**

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|---------------------------|---|---|---|----------------|
| Queen's Park Station Area - Supplementary Planning Document | Observations | Think quality of life, think environment. | I am pleased that a height cap of 12 storeys has been agreed for the Queen's Park Station/Car Park development, but feel that, if possible, this should be further reduced by design modification. I am concerned that the courtyard within the proposed structure will not be a successful 'living' space, but a dead area, a crime magnet. A square with streets of terraced housing around it would be far more user friendly. There are plenty of successful models for this, especially in mainland Europe, where squares with benches and trees are popular meeting places for all ages by day and naturally 'monitored' by night by the presence of residents whose houses overlook the square. The terraced housing does not have to look 'traditional' - it can be an aesthetically pleasing modern design using shapes and materials that bring the natural world into the urban space. The more a sense of nature is brought into the design the less alienating the architecture. Concern for the environment needs to be a key feature of the design, with permeable surfaces at ground level to minimise water run-off and styled to be easy on the eye. Whenever they are not bearing solar panels the roofs should be clad in sedum to provide a habitat for insects. The way we live is changing, the environment is changing. I do not feel the present design takes account of this. The aim should be a forward-looking carbon neutral design. There are some good architects in the world. Let us not get stuck with an unimaginative complex. | <p>The idea of the courtyard is to create a lively square in the middle, with shops, cafes and bars, trees and landscaping with residential units providing natural surveillance round, reflecting European square models.</p> <p>We are also recommending roof gardens to both provide amenity space for residents and break up the appearance of the building.</p> <p>The sustainability section of the SPD seeks the inclusion of numerous sustainability measures.</p> <p>The council are also expecting to run an architectural competition for the site, to ensure the highest standards of design and innovation are achieved on this site.</p> <p>No changes recommended.</p> | No change |

Representor : 172
ms jennie cosgrove

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|---|--|---|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Object | I believe your present plans should be scrapped in favour of something more traditional and low rise. | A 12 storey building is unacceptable. Whilst efforts to improve the Queens Park station area are to be applauded I'm afraid this current plan is still not right. Queens Park is an area which has improved and improved. Please do not set this process back by imposing yet another high rise building on our horizon and by constructing a building which looks, I'm afraid, just like a very ugly space ship has landed. It is not remotely in keeping with the buildings of Queens Park. This current plan with the 12 storey part and its modernist look will also look over time, I believe, as grubby and run down as other similar buildings.. The village feel of Queens Park will be ruined. Please do not do it. I believe your present plans should be scrapped in favour of something more traditional and low rise. | <p>The SPD is intended to provide guidelines for development and is required by PPS1 not to be too prescriptive in design terms such as design of buildings. Therefore the images in the document are meant to only illustrate the scale, massing and layout which any development scheme should adhere to. The final design will be expected to be of exemplary standard and should address all the issues on the site sensitively.</p> <p>In light of the location of the SPD site adjacent to the key transport node of Queen's Park Station, with a public transport accessibility level (PTAL) score of 6 which is high, the significant costs associated with assembling the site and their impacts upon viability, it is believed that 12 storeys on a small part of the site is an appropriate height for development at this site. In addition to this, 12 storeys on part of the site allows the majority of the site to be developed at 4 storeys, which is sympathetic to the more sensitive parts of the site along Kilburn Lane and Claremont Road. This also allows a high quality and highly sustainable development. No changes recommended.</p> | No change |

Representor : 171
Mr Richard Brindley
(Local Resident & QPARA Planning Rep.)

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recommendation | Outcome |
|---------------------|-------------------------|--|--|---|------------|
| 1 Executive Summary | Support with conditions | Locate the high point of the development (rising up to a max of 12 stories) at the South East Corner of the Site | I have been a resident of Queens Park for over 25 years and an active member of the Queens Park Area Residents Association (QPARA). I currently act on behalf of QPARA as one of their representatives on planning matters. I am therefore responding in my to capacities as both local resident and QPARA representative. | See changes made to all sections of the SPD referencing the location of the tallest element stating a clear preference for the tallest element at the north eastern corner. Recommend this for a number of reasons: | No change. |

The Queens Park Station Area is an important regeneration site at the centre of a local transportation hub (train/tube/bus/roads) and needs a detailed and well considered approved SPD to achieve the quality and content of development required by the local community and Brent Council. The objectives and development principles of the draft SPD are sound and have been developed by Brent Planning Department after extensive consultation with the local community and stakeholders. I therefore support the SPC subject to one condition of the massing of the scheme (SPC Section 4.5).

In accordance with current national and local planning policy, and the local context, this site is appropriate for a high density residential and mixed-use development of 4-5 stories rising, in a suitable high profile area of the site, up to a maximum of 12 stories. In both quality urban design terms and the context and amenities of the existing and proposed buildings, the high point (up to 12 stories) of the proposed development should be at the South East Corner of the Site (current location of the Falcon Pub) and NOT at the North East corner as currently indicated in the SPD.

The key reasons for locating the high point of the development of the site in the South East Corner are:

1. Most prominent corner of the site, visible as the end vista and junction point of 4 main roads (Carlton Vale, Salusbury Road, Kilburn Lane, Fernhead Road) and therefore recognised in good urban design terms (Refer to CABA urban design guidance) as the location of the Feature Building.
2. It is the lowest part of the site (thereby reducing the actual height of the tallest section of the development) and also enable the height of development along the Western side of Salusbury Road to gradually rise from the North to the South
3. Adjacent to the existing tall residential towers, other existing key buildings (church) and the main road junction.
4. Any overshadowing created by the high point onto the rest of the proposed development would only occur for a short period in the early morning. Afternoon/evening shadows would be onto adjacent roads and not existing buildings.
- 5.. Opportunity to create more westerly facing roof terraces, as the development rises to the East, to enjoy the afternoon/evening

- it creates the least impact upon daylighting and sunlighting;

- creates a landmark gateway to the Queen's Park area;

- compliments development planned as part of the South Kilburn Masterplan.

- Prevents overshadowing of the courtyard and residential units within the scheme

- The residents and traders in the shops and flats on Kilburn Lane will feel less overlooked

This will not preclude development at the Falcon site if it can be demonstrated through innovative design that concerns over daylighting and sunlighting and impact on amenity of those on Kilburn Lane can be overcome.

No further changes recommended.

SPD changed to support a clear preference for the higher element at the station end but the brief will allow developers to propose a higher element towards Kilburn Lane if they can overcome the objections on impact and design that the council sets out to it.

No further changes recommended.

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| | | <p>sunshine and also to reduce the number of flats directly overlooking and adjacent to the main-line railway lines and QP train station.</p> <p>I understand that the main reason for locating the high point of the development at the NE corner is to reduce overshadowing of the proposed development and to create sunny roof terraces. This is not valid. It will only create more easterly facing roof terraces, and more northern facing residential units, overlooking the railway station.</p> <p>I request that Brent Council consider relocating the tall point of the development at the South East Corner of the site (or at least allowing this as a developemt option) in accordance with the original proposals and recomendatons of the Council's architects and design consultants.</p> <p>Richard Brindley.</p> | | |
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Representor : 173
Hyde, Bellway & Taylor Woodrow

Agent : 167
Angela Cameron

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---------------------|---------------------------|---|---|---|
| 1 Executive Summary | Support with conditions | <p>Executive Summary</p> <p>We support the Council's aim to regenerate the South Kilburn area. Redevelopment of the Queen's Park Station site should help to spread the economic prosperity of Queen's Park and Maida Vale to the retailers and residents around the station. The key concern regarding the SPD is the lack of reference to the wider South Kilburn Masterplan. Further clarity regarding how development on this 'kick start' site will be used to cross-subsidise community facilities and social housing on the wider South Kilburn area is required to provide surety to developers and local residents. The SPD is inconsistent on the density of habitable rooms per hectare and the anticipated number of units that Site 18 can accommodate. Density calculations should be revised based</p> | Comments noted. The points raised here are dealt with individually below. | Changes made as detailed in following sections. |

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| | | to reflect a scheme that is both economically viable and sustainable in land use terms. In terms of site layout, we fully endorse the Council's aspiration for a high quality design but would recommend that flexibility is retained in terms of massing and layout in order to allow innovative design solutions to be developed. Flexibility also needs to be retained in terms of affordable housing unit numbers and tenure mix to accommodate scheme design and viability. | | |
| 2.4 Objectives of the SPD | Observations | <p>'Kick Start Site'</p> <p>The initiative to bring forward development at Queen's Park Station should help to spread the economic prosperity of Queen's Park and Maida Vale to the Salusbury / Kilburn Road local retail centre and the community surrounding the station. The SPD should highlight the principle of development of Zone 18 providing the impetus to 'kick start' the wider South Kilburn regeneration project.</p> <p>Providing a tall building element on Site 18 and increasing the number of units that</p> <p>can be accommodated onsite can provide financial benefits for further development</p> <p>across the South Kilburn Masterplan area, such as community facilities and social</p> <p>housing.</p> | <p>Agreed. Recommend the following changes:</p> <p>New bullet point added at section 2.1:</p> <p>"- To help facilitate the wider South Kilburn regeneration but to allow development that is independent of the wider South Kilburn proposals."</p> <p>Also additional wording added at point 1 of the Executive Summary to read: The Council's first priority is to support and promote a viable mixed use scheme to develop and assist in.. KICK STARTING...the regeneration of the South Kiburn area and to spread the relative economic prosperity of Queen's Park to the north, to the area to the south of the railway.</p> | Changes as recommended. |
| 4.1 Sustainable Development | Observations | <p>Sustainability</p> <p>This section is a general catch all section which reflects what is happening with policy elsewhere. The two areas which may provide difficulty are ecological diversity and SUD's/Grey Water recycling. With regard to ecology, the indicative designs show a predominantly hard landscaped urban form. So, with the exception of some urban tree planting, soft landscaping would be fairly limited. The BREEAM Ecohomes standard covers a range of sustainability issues under a number of headings including energy, transport, materials, water, health and wellbeing. This is widely considered the industry standard for assessing sustainable development. The SPG should incorporate BREEAM / Ecohomes as the prime measure of sustainability. Clarification is also required on how the site will meet emerging GLA policy for up to 20%</p> | <p>Figure 1 illustrates a courtyard with a grassed area, trees and a water feature. This is not prescriptive but it is expected that high quality landscaping should be achieved within the limits of the site. No changes recommended.</p> <p>In terms of BREEAM eco homes this is recognised as the primary mechanism to achieve sustainable development, but the council seeks the the inclusion of the additional sustainability measures as listed in section 4.1, which reflect national and regional planning guidance.</p> <p>In terms of the emerging GLA requirement for 20% renewables, this is an issue for the developer to address.</p> | No change. |

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| | | renewables across the site. | | |
| 4.3 Uses | Observations | <p>Land Use: Housing</p> <p>Density is considered from different perspectives: one being based on PTAL ratings, the other on economic viability. Assuming a scheme of 270 units, with a mix of 25 one bed, 65% two bed and 10% three bed, this would equate to 770 habitable rooms for a site area of 0.58ha or 1337 hrh – exceeding density guidelines. Discrepancies between unit numbers and habitable rooms need to be corrected. The affordable housing requirements further demonstrate this: the SPD requires 50% affordable housing, however a more flexible approach for affordable housing in terms of mix, tenure and unit numbers needs to be adopted to reflect design and viability. Furthermore, this site is not considered wholly appropriate for family housing, as the development will provide retail / commercial ground floor uses and minimal open space areas.</p> <p>With regard to sizes, the document refers to Scheme Development Standards (SDS)</p> <p>or South Kilburn NDC (SKNDC) housing sizes. There is a great discrepancy in sizes between these documents with the SKNDC housing sizes requiring Parker Morris +20%. It is suggested that the SPD emphasise the Council's desire to work with the Applicant to agree a viable affordable housing unit mix.</p> <p>Land Use: Commercial & Retail</p> <p>The proposal to include retail use along the ground floor fronting on Salusbury and Kilburn Lane is supported. Retail usage along this frontage is key to ensuring an attractive street scene and will encourage pedestrian flows to / from the site and the retail facilities along Salusbury Road. It is suggested that commercial uses are concentrated on Kilburn Lane and Salusbury Road frontages. Consideration should be given to accommodating an anchor convenience retail store on the latter. With regard to the retail component, there is no indication of what would be an appropriate amount or numbers/size of units. Urban design principles suggest that most of the ground floor should be used in this way, if only to enliven the extensive public realm created. Reference to</p> | <p>Recommend the following alterations:</p> <p>Deletion of the last sentence of the first paragraph under the subheading "residential". Insertion of additional sentence to read: "In view of the site's excellent transport accessibility and proposed transport improvements, the council will consider densities in excess of these guidelines given exemplary design, layout and sustainability standards."</p> <p>Also recommended that at the end of the 6th sentence of the second paragraph under the subheading "affordable housing" the following worded is added: "...taking into account issues of viability"</p> <p>An additional sentence should also be added in between the 7th and 8th sentence of the section reading: "The council will consider viability issues in considering the final dwelling sizes."</p> <p>Land Use: Commercial</p> <p>Agree to delete the word "specialist" from the first sentence of the paragraph under the Commercial sub heading.</p> <p>With reference to comments requesting detail on the appropriate number and sizes of units, it is felt that the amount will depend upon the final design of the scheme and should adhere to the adopted UDP policies on shopping.</p> <p>Land Use: Community Facilities</p> <p>The level of community facilities provided on the site will be negotiated with developers. The council encourages the re-provision of the British Legion and suggests health facilities only if there is not sufficient provision within the South Kilburn area.</p> <p>An additional sentence is recommended to be added after the 3rd sentence to read: "Commercial shopping and cafe uses should be concentrated on the Kilburn</p> | Changes made as indicated. |

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| | | <p>'specialist shopping area' should be deleted – this is overly prescriptive and could jeopardise viability.</p> <p>Land Use: Community Facilities</p> <p>The document discusses community facilities in a very general way. It is not clear whether the Council is seeking additional facilities as well as the relocation of the British Legion. There is no recognition of the work being undertaken in the wider South Kilburn context to look at the scope and quantum of community facilities required or the impact it would have on viability. Reference to healthcare should be deleted. The SKNDC plan does not allocate health facilities to Site 18, as provision is considered more appropriate on other sites in the South Kilburn Masterplan area. The document also refers to workspace. This reference should be deleted as it has not been demonstrated there is a need for this facility.</p> | Lane and Salusbury Road frontages." | |
| 4.4 Layout & Siting | Observations | <p>The internal courtyard approach</p> <p>SPD advocates particular development form. We believe that it is important to acknowledge that there may be other building forms that will address vital street frontage and provide improved pedestrian frontage and public realm.</p> <p>Double Aspect Units & Unit Access</p> <p>The expectation that residential units to be double aspect, especially where there are issues of sunlight/daylight or noise, will potentially have an effect on the form of the building. This is considered to be over prescriptive and will strifle innovative design solutions to these problems. The requirement for direct access for residential units is not recommended in 'Secure by Design' terms. A vestibule area should separate external access and residential units to prevent forced entry.</p> | <p>The internal courtyard approach</p> <p>Page 26 considers the value of an innovative approach, but the SPD must reflect the work carried out to assess the impact of this scheme carried out through the stakeholder meetings and the public's support of it.</p> <p>Double Aspect Units & Unit Access</p> <p>Agree to remove the reference to direct access onto the streets under the subheading "Residential units" at section 4.4 The only text to remain from this paragraph is "the required distances between habitable rooms will be sought to ensure the level of amenity for future residents" which should follow the last sentence of the paragraph headed "Orientation". Additional text is recommended to be added to follow this to read: "Innovative design solutions will be sought."</p> | Changes as detailed. |
| 4.5 Scale & Massing | Object | <p>Removing the Constraint on Building Height</p> <p>As stated by the Council in their SPD, the Queen's Park Station site (Salusbury Road Car Park and associated sites) is a gateway site to the Salusbury and Kilburn Lane retail area. Zone 18 is an opportunity to provide a key land mark building to attract inward investment and employment into the area. Well-designed, higher density housing is part of</p> | Work has established that 12 storeys has minimal impacts on views locally and into and out of the Conservation Area and therefore this is considered a reasonable upper limit. | No change |

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| | | <p>London's urban tradition. The SPD should not seek to control the building height across the site in a prescriptive manner. Rather, the most appropriate height should be tested via a design competition and subsequent planning application. Situated close to Queens Park Station (PTAL rating of 5) and having ready access to existing commercial / retail facilities along Salusbury Road and Kilburn Lane, this site has the most capacity for a tall building element of those being brought forward under the South Kilburn Masterplan. Therefore, providing design criteria are met, the unit capacity and density of this site should be maximised, in line with London Plan housing policies.</p> | | |
| 4.5 Scale & Massing | Observations | <p>Scale, massing, height</p> <p>The brief mentions that most surrounding buildings are 3 to 4 storeys with some blocks up to 14 storeys. The limitation of the tallest element to 12 storeys is based around its impact on views but the massing studies do not assist in this judgement. Locating the tallest element – in figure 2 – at the highest part of the site, is only one of a number of options: the tallest element could also be located at the key road junction, one of the lowest points of the site, where it can act as a landmark for the regeneration area, with the principal public space at its base. Rather than being prescriptive, building height should be determined by the scale of the space immediately surrounding the building, major townscape views, the settings or backdrop to major existing buildings.</p> <p>Site Level Change</p> <p>Neither the design concept nor the SPD acknowledges the change in level across the site and the restrictions/opportunities that this may present.</p> | <p>Scale, Massing, Height</p> <p>See changes made to all sections of the SPD referencing the location of the tallest element stating a clear preference for the tallest element at the north eastern corner. Recommend this for a number of reasons:</p> <ul style="list-style-type: none"> - it creates the least impact upon daylighting and sunlighting; - creates a landmark gateway to the Queen's Park area; - compliments development planned as part of the South Kilburn Masterplan. - Prevents overshadowing of the courtyard and residential units within the scheme - The residents and traders in the shops and flats on Kilburn Lane will feel less overlooked <p>This will not preclude development at the Falcon site if it can be demonstrated through innovative design that concerns over daylighting and sunlighting and impact on amenity of those on Kilburn Lane can be overcome.</p> <p>No further changes recommended.</p> <p>Site Level Change</p> <p>Agree that reference to site level change should be</p> | Changes as detailed below. |

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| | | | added at section 2.3 at the end of the first paragraph under the subheading site analysis. | |
| 4.7 Landscape Design & Public Realm | Observations | <p>Public Realm</p> <p>The requirement for direct access on to the streets for residential units conflicts with the requirement for retail on ground floor. It will not be possible for individual units to have direct access to street. Reference should be made to 'provision for' a second access rather than an obligation to provide. Clarification with TfL and the Council regarding the second access is recommended prior to submitting a planning application.</p> | <p>See earlier recommendations for amendments in terms of direct access onto streets for residential units where this is already dealt with.</p> <p>In terms of the provision of a second access, this is an expectation, therefore no changes recommended.</p> | No further changes. |
| 4.8 Transport & Access | Observations | <p>Road Network Layout</p> <p>The existing road network gyratory has been substantially reorganised, with the road that currently crosses the site being closed off to vehicular traffic. A bus only route is introduced that runs adjacent to the rail line which we understand has been agreed with LUL. If this is not the case the SPD should acknowledge the potential impact this could have if the bus network movement needs to be amended. In addition the road layout needs to acknowledge the maintenance and access requirements for the railway.</p> | <p>The bus routes around the site have been agreed in principle with TfL. Agreed that the SPD should reference the maintenance and access requirements for the railway.</p> <p>Recommend the insertion of the following sentence after the 4th sentence of the 2nd paragraph at section 4.8 to read: "Any development should ensure that there is adequate provision for maintenance requirements and access associated with the railway."</p> | changes as detailed. |
| 4.9 Parking & Servicing | Observations | <p>Parking / Servicing</p> <p>The document recognises that the site has a PTAL rating of 5 and refers to other LBB documents. The document should acknowledge that the parking level provided will be, in part, determined by the physical constraints of the site. How the scheme is to be serviced both in terms of waste collection and deliveries to the retail could be from the surrounding streets only. The proposed central area is not big enough for vehicles (taking into account required turning circles etc) and in any case the presence of vehicles would detract from the reasoning behind the public realm.</p> | <p>Recommended that the issue of parking provision is clarified further by the addition of the following wording after the first section of 4.9: "However, it is recognised that the level of parking provision achieved will be subject to the physical constraints of the site and viability." And also the following wording added to the thirs paragraph of this section: " In terms of the collection of waste and the sevicig of retail units, the council's first preference is that this should take place in the basement of the new development. If this is demonstrated to be unachievable then the council will consider allowing this to take place on Claremont Road."</p> | Changes as detailed. |
| 6 Implementation | Object | <p>Compulsory Purchase Orders</p> <p>Delete 'to form a joint venture.' This is not a route agreed with the Council and if this remains as drafted could frustrate development</p> | <p>Recommend that the compulsory purchase section of chapter 6 (Implementation) is reworded to read:</p> <p>"It should be made clear that the council is prepared to use its Compulsory Purchase (CPO) powers in order to assemble a site for development. In the first instance, the council will work with the consortium rebuilding South Kilburn as this will allow the site to come forward</p> | changes made as indicated |

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| | | | for development more rapidly and assist in the wider regeneration objectives in South Kilburn. However, the council should consider CPO as a last resort to achieve its redevelopment objectives. CPO powers will only be exercised where a development partner meets all the costs of acquisition and so indemnifies the council. | |
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Representor : 176
Mrs Natasha Willis
(Local resident)

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|----------------------------|--|--|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Object | Twelve storeys? No thanks! | <p>Thank you for attending the recent consultation meeting for Westminster residents. Here is my personal response to the plans.</p> <p>First I ask that a full environmental impact assessment is conducted on the proposed development. I do not accept your assertion that the council doesn't need to do this because the site is small. It may be small to the council, but for local people, this development is huge, and by its very nature is bound to have an impact on the local environment.</p> <p>I think that the proposed development, although undoubtedly an improvement of the idea of a 26-storey tower, is still inhuman in scale. The inclusion of a twelve storey tower means that rather than the joys of Salisbury Road being spread south towards Kilburn Lane, we are just spreading the South Kilburn estate model west. If we must have a twelve storey tower, I beg that it be put at the north of the site, next to Queens Park station. The vibrant and pleasant Salisbury Road might be able to cope with having a tower on it. If the twelve storey element is put at the corner of Kilburn Lane (on the site currently occupied by the Falcon pub), it will make an already inhuman corner of the neighbourhood even more so.</p> <p>When deciding where to place the twelve-storey element, please also bear in mind that St Luke's Church is on the corner of Kilburn Lane. This place of worship deserves space and light. It does not deserve to be overshadowed by a twelve-storey tower.</p> <p>I am concerned that the bus stands and stops will be congregated on</p> | <p>EIA</p> <p>It is the council's view that EIA will not be required in the light of what is known about the site and the information gathered from the previous application, the work carried out by the council in developing the SPD and the assessment of the significance of the likely effects on a scheme of this size, in this location. This will be kept under review if development proposals for the wider South Kilburn area emerge and proposals become firmer. It is the significance of likely environmental effects/impacts that drive the need for an Environmental Statements in this instance and not the size of the site per se.</p> <p>Location of tallest element</p> <p>The location of the higher section of the building to the north of the site will prevent overshadowing of the courtyard and residential units within the scheme. The residents and traders in the shops</p> | No change |

Kilburn Lane. Wouldn't it make more sense to tuck them away at the top of the site, adjacent to the railway lines? As with the proposed twelve-storey tower, I am concerned that the Kilburn Lane end of the development will become the 'arse end' of the site where all the unlovely bits go. Just because Kilburn Lane is on the very edge on Brent, please don't make it a dumping ground for the unpleasant aspects of the development. The people who live near Kilburn Lane want to live in an attractive, human neighbourhood just as much as anyone else does.

The courtyard design is not a bad idea, but what kind of courtyard will it be – beautiful garden or 1960s shopping precinct? I was not impressed with the pictures shown of the Gainsborough development, the reason being that this was a paved courtyard. This might be alright in an office development, but paved areas, however attractive, don't offer real living space to residents. What we need in outside areas is a nice lawn to sit on and trees to sit under. I ask the council to commit to making the courtyard a 'mini Queens Park' – i.e. a proper, living garden that residents can sit out in on a summer's day. There would be several benefits from such a design:

Firstly, it would enhance a sense of community among the people moving into the block by giving them somewhere to relax and get to know each other.

Secondly, it would take the pressure off the existing park, which already gets extremely crowded on warm days and will undoubtedly get even more crowded once the South Kilburn development gets underway.

Thirdly, it would be a proper environmentally friendly aspect of the scheme. As the council will know, London has a problem in that more and more of the city is getting paved over (e.g. with people concreting over their gardens to make a parking place for their car). Too much concrete/paving causes drainage problems, and weakens the eco-diversity of the city. Gardens are definitely the way forward! You could even do something like consult the London Wildlife Trust about creating a wildlife garden in one section of the courtyard. I know there are local people who would be happy to volunteer to help look after it. I also believe that a garden, rather than paved courtyard, would lessen the risk of crime. Gardens are places where everyone can sit – no-one sits down on paving, you can only 'hang about' there, and that tends to lead to crime.

I am pleased that the council is keen on making the development eco-friendly, for example through a grey water scheme, which I think is an

and flats in Kilburn Lane will also feel less overlooked. Therefore as detailed in other responses the council is now minded to recommend that a clear preference is stated in the SPD that the location of the tallest element of any proposals should be at the north eastern corner of the site adjacent to the station.

Location of bus stops etc

The bus interchange is proposed to the north of the site adjacent to the station, which is where the number 36 bus will terminate, stand at and start from. This layout was the preference of Transport for London (TfL) as operator of the bus routes in the area. An option with the bus interchange to the north of the site was presented to TfL but was not favoured as would mean the diversion of existing bus routes. The buses shown along Kilburn Lane in figure 4 are intended to illustrate the approximate location of bus stops. The reconfiguration of the bus routes in this area will result in less disturbance to the residents of Claremont Road, as there will only be one bus route using this road, and it will no longer have to travel up the full length of Claremont Road, and will only use the section illustrated in figure 4 (section 4.8 of the SPD). No changes are recommended.

Affordable housing

In light of the physical constraints of the site and likely cost of assembling the site, the council is willing to accept less than 50% affordable housing, if this cannot be viably achieved here.

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| | | <p>excellent idea. A true 'eco' development would be something for the neighbourhood to be proud of, rather than yet another soulless monolith. Have you also considered, for example, turf roofs? Things like this are not just eco-friendly but would help soften the look of the development and potentially make it very attractive.</p> <p>I was shocked to learn at the recent consultation meeting that there will not be 50% social housing in the new development. We had been led to understand that we must accept the development because of London's housing crisis – families having to live in B&Bs because of a lack of council housing, etc. As the new development doesn't address that issue, I'm less clear why we should all put up with the development. What's in it for the local residents? Will the development contain, for example, a public swimming pool, or a little cinema? (On pages 13-14 of the SPD, it says 'the SPD seeks to ensure... improved community and leisure facilities.) If not, will the central courtyard be a place that people will genuinely want to spend their Sunday afternoons in? As another resident said at the meeting, all the proposed development is doing for us is taking away our local car park. Can more commitment be shown to actually giving us something good to make up for having a more crowded neighbourhood and having to live next to a building site for at least 18 months?</p> <p>Discussion was held at the meeting about the kind of shops that would open on the ground floor of the development. The clear feeling of the meeting was that we are opposed to any Tesco/Sainsbury's/other supermarkets opening in this development. (Remember that residents successfully protested against a Sainsbury's opening on Salusbury Road some years ago.) If the council is serious about extending the feel of Salusbury Road southwards, they need to look at what kind of shops are already there – the deli, the bookshop, etc. As well as destroying the character of the neighbourhood, a supermarket would also add delivery vans to an already congested area, and would encourage illegal parking while people popped in to get a few items.</p> <p>The Business section of today's Observer reported that more than two thirds of new homes in London are sold to buy-to-let investors. Will the council take steps to prevent that happening with this development? I don't think any local residents want to put up with this development just for investors to make a quick buck. Also, people who rent privately tend to be young, single and to move on quite quickly. If the development is to turn into a community, it also needs people to live there long-term. Please make sure that the development is designed in such a way that this can happen.</p> | <p>Courtyard</p> <p>The SPD promotes a courtyard design, and the provision of a Landscape Strategy. The council expects semi-mature and mature trees and soft landscaping to be included, but the form this takes will be developed as part of the design of proposals by any developer - but the requirements for landscaping, trees etc should be met.</p> <p>Type of shops</p> <p>In planning terms, the SPD can prescribe only the type of uses on the site. Therefore no changes recommended.</p> | |
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Representor : 177
Mr Laurie Willis

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|---------------------------|--|---|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Object | Back to the drawing board | <p>Following the recent meeting with Westminster residents and Dave Carroll, I continue to object to the proposal for the following reasons:</p> <ol style="list-style-type: none"> 1. It is still far too big and is not in keeping with the surrounding site. It will dominate the area and Queens Park is just not big enough to cope, especially with the forthcoming South Kilburn regeneration. The tube station is already packed, the park itself overrun and vague mention of improvements to local services such as schools and doctors sound like a minimum effort solution. 2. Having a 12 storey tower would dominate the south part of the site, making it a 'dumping ground' for all the bad bits, e.g. bus stops. 3. Still no thought out solution to car parking issues. It is all when and good to suggest that residents should use 'car-sharing' schemes but will it actually happen? Will you only allow buyers if they can prove they don't own a car? Of course not. Ideals are one thing, but the reality is these (mostly private) residents WILL own cars and not have anywhere to park. It will cause parking chaos for them and existing residents. 4. The bus route solution is a muddle. Kilburn Lane is already congested enough and bendy buses will contribute to this being an accident black spot. 5. Courtyard design looks nice in principle but I worry about the reality. Dark paths are dangerous and attract groups and gangs. Also, why so much concrete? It needs to be greener. | <p>The scale, massing and size recommended in the SPD for this site have been developed to create the least impact in terms of views and relationship with surrounding properties. In light of the location of the SPD site adjacent to the key transport node of Queen's Park Station, with a public transport accessibility level (PTAL) score of 6 which is high, the significant costs associated with assembling the site and their impacts upon viability, it is believed that 12 storeys on a small part of the site is an appropriate height for development at this site. In addition to this, 12 storeys on part of the site allows the majority of the site to be developed at 4 storeys, which is sympathetic to the more sensitive parts of the site along Kilburn Lane and Claremont Road.</p> <p>A car club scheme will be required as part of the S106 legal agreement for the development, therefore a developer will be required to implement this in order to develop the site. The level of car parking provided will be dependent upon viability.</p> <p>The layout of the bus routes was arrived at through consultation with TfL, and is their preferred option as it does not require re-routing of the existing bus routes and allows for the no.36 to start, terminate and stand by the start, reducing the nuisance to residents of Claremont Road where the buses currently stand.</p> <p>The SPD is intended to provide guidelines for development and is required by PPS1 not to be too prescriptive in design terms such as design of buildings. Therefore the images in the document are meant to only illustrate the scale, massing and layout which any development scheme should adhere to. The final design will be expected to be of exemplary standard and should</p> | no change |

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| | | <p>6. Overall, there seems to be a shift in the purpose of the project as a whole. Initially, it was to provide affordable housing, now, due to cost, it is to fulfill Brent's targets for building new homes, and I cannot endorse that. Affordable housing as part of a carefully thought out plan considering the needs of the existing residents and surroundings is acceptable, but building a load of private housing is not.</p> <p>One last point, Dave Carroll mentioned that the land is now part owned by Genesis. So, nice for them to make a tidy profit from their flawed and rejected plan, but how did this happen? I wonder what premium Brent Council will be made to pay for this. Hardly installs confidence.</p> | <p>address all the issues on the site sensitively and be designed to "Secured by Design" standards to address security and safety issues. Also the residential units surrounding the courtyard will provide natural surveillance thereby reducing risks of crime.</p> <p>In light of the physical constraints of the site and likely cost of assembling the site, the council is willing to accept less than 50% affordable housing, if this cannot be viably achieved here. Applicants will have to demonstrate that 50% is not viable on this site using the housing toolkit recommended by the GLA.</p> <p>Genesis own the Keniston Press site, and have done since before their application for a 26 storey tower on the northern half of the site. Brent Council owns the car park and Cullen House which if sold will be required to be sold for market value, and it is likely that these sites will be sold to the delivery vehicle for South Kilburn to take them forward.</p> | |
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Representor : 178
James & Rebecca Webb

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|--|--|------------|
| Queen's Park Station Area - Supplementary Planning Document | Object | <p>We are concerned about the Queen's Park Station Area development proposal for the following reasons:</p> <p>Pressure on local resources such as schools, doctors, parks etc. by influx of people – we are interested to learn about how Brent Council proposes to manage this change in requirements</p> <p>Safety of walkways through housing square – we question whether it will be safe, crime free and pleasant to walk through at all times of the year, not just in summer – would it be safe enough at 11pm for example, when compared with the current road route where you are currently visible (and others to you) at all times</p> | <p>Infrastructure</p> <p>change made to emphasise importance of ensuring adequate local infrastructure through the use of planning obligations at objective 8.</p> <p>Construction</p> <p>Developers required to sign up to considerate constructors scheme to ensure minimal disturbance is made to local residents and businesses.</p> <p>Local shops - the development is intended to assist in drawing more people down to Kilburn Lane through the development.</p> | No changes |

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| | <p>Height of building – by adding another tower block you make this area undesirable rather than desirable</p> <p>Parking – how will the lack of parking for residents be managed? What about the people who currently live in the area? How will it be ensured that they retain the same amount of space (which is already very limited)? This point applies both to Westminster and Brent Council residents.</p> <p>Local shops may suffer – if there are more shops in the development, how will this affect businesses that are already here? Will they be offered compensation?</p> <p>Pressure on public transport – if more people live in the area, will more trains, tubes and buses be scheduled through Queen’s Park as a result?</p> <p>Disruption during construction – disruption to traffic in the local area (which is already often congested). How can closing one route possibly make this less congested?</p> <p>Regarding the proportion of affordable and private dwellings, we understand that a less even split is likely in favour of private dwellings (up to 70/30, in order to get a sufficient return for the property developer). If this development really must go ahead then it is our view is that we would rather see a higher proportion of private ownership (on this first of several developments) in the hope that this would bring with it a better and long-lasting aesthetic build quality than a design that would need to be compromised in order for it to be financially viable to the affordable/social housing sector. If this were to happen we feel that longer term, there is a greater risk of the look and feel of the environment becoming no less run down than in it’s current state. (IN short, do this one to a higher spec to immediately set a better tone for the area, then allow subsequent developments to meet the Mayor’s requirements.</p> | <p>Safety</p> <p>Building should be designed to "Secured by Design" principles to minimise risks of crime. Residential units surrounding courtyard ensure natural surveillance on public area.</p> <p>Height</p> <p>As explained to other concerned residents, this site is in a high level of public transport accessibility (PTAL score of 6 which is the highest score), national and regional planning guidance directs high density development to these areas.</p> <p>The level of affordable housing achieved on this site is ultimately dependent upon viability. However SPD is being changed to emphasise that it is recognised that the site has physical constraints and costs associated with assembling sites therefore the council is willing to accept less than 50% if it is demonstrated that 50% affordable housing is not viable.</p> | |
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Representor : 179
 Sarah Whitnall
 (Westminster City Council)

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|-------------------------|---|--|---------------------------|
| Queen's Park Station Area - Supplementary Planning Document | Support with conditions | <p>I can confirm that I have no objection in principle to the redevelopment of the site and the guidance set within the draft SPD is considered to be a significant improvement to the previously withdrawn scheme. The principle of a mainly residential scheme with much needed affordable housing for the area is welcome; however I would like the following detailed comments to be taken into account:</p> <p>Land use</p> <ul style="list-style-type: none"> •Any retail uses within the site needs to respect and not detract from the existing retail shops along Kilburn Lane which is a designated local shopping centre within the Westminster Unitary Development Plan. <p>Design</p> <ul style="list-style-type: none"> •The principles in the brief relating to design are generally sound. •There is no objection to a modest “tower” element providing it is situated on the northern part of the site towards the railway line. The brief suggests this approach which is welcomed as the most appropriate location. •However objection would be raised to such a “tower” element along Kilburn Lane because of the impact on views along the road and from within Westminster. Although a matter for Brent Council, a tower on the southern side would affect the amenity and good planning for the remainder of the development site. •It is considered that a maximum height of 4-storeys along Kilburn Lane would sit more comfortably on this part of the site as the properties along Kilburn Lane are generally 3-storeys in height. The brief suggests 4 to 5 storeys, however 5 storeys on this part of the development is considered to be too high in this location. •The Falcon PH is the only building of architectural merit on the site and thought should be given to retaining this building. •The replacement building, particularly if the Falcon PH is to be | <p>Land Use</p> <p>The word used is 'local' shopping facilities and this will not detract from local shops on Kilburn Lane</p> <p>Design</p> <p>SPD changed to support a clear preference for the higher element at the station end but the brief will allow developers to propose a higher element towards Kilburn Lane if they can overcome the objections on impact and design that the council sets out to it.</p> <p>CHANGE</p> <p>Agree change to SPD that makes it clear that 4 stories on Kilburn Lane and Claremont Road is the norm but it may be possible to add an additional storey on elements along these frontages if that development is set back and does not affect residential amenity and can be justified on design terms.</p> <p>CHANGE</p> <p>The Falcon Pub is not statutorily or locally listed and therefore does not justify retention on those grounds. The SPD does not preclude building around the Falcon Pub but the whole purpose of the SPD is to create a high quality sustainable building.</p> <p>Amenity</p> <p>The need for such assessments is noted.</p> <p>Transportation</p> <p>The council awaits comments from Westminster's highway service, the SPD was delivered to them at the start of the consultation period.</p> | Changes made as indicated |

replaced needs to be of a high quality of design and sustainability.

Amenity

- A daylight and sunlight which assesses the impact of any proposal on the daylight and sunlight of surrounding properties is welcomed and should include the impact on Westminster Residents along the south side of Kilburn Lane.

Transportation

- It is disappointing that indicative bus layout schemes have been discussed with Transport for London without input from Westminster's highways engineers. It is imperative that Westminster's highways engineers are involved at the earliest opportunity.

- The bus lay by set-backs on Kilburn Lane are of concern, given the narrow width of Kilburn Lane and the amount of traffic movement it accommodates.

- The pick up point for the bus route 36 appears to be further away from the station at present.

- Any reduction of disturbance to residents within Claremont Road should not be at the expense of Westminster residents.

- The traffic improvements sought to the junction of Kilburn Lane and Carlton Vale needs to be in consultation with Westminster's highways engineers.

- Whilst no objection is raised to the provision of a short stay car park within the site to replace the existing one, details over the access point is unclear. It appears from the SPD that all traffic including servicing will have to enter and leave the site via Kilburn Lane and this raises serious highways concerns.

- Any car club within the development should be available to the public at large including Westminster residents.

- Many of the roads off Kilburn Lane are the subject to Controlled Parking Zones for residents with permits, however, at weekends these bays have no restrictions and the impact of the proposal on these roads needs to be addressed.

The pick up for the 36 bus is on Kilburn Lane and would be further away but the drop off is nearer-this is TfL's preferred solution currently.

Any reduction of the 36 bus around Claremont Road would also benefit Westminster Residents.

Short-stay Car Park-in considering other representations it is proposed to clarify the SPD such that there is no requirement to re-provide it. This would of course reduce traffic impacts from this source.

Need to consult Westminster as Highway Authority is understood.

City Car Clubs would not be restricted to Brent residents-the purpose is to get as wide a usage as possible for maximum positive impact and to encourage further provision.

CPZ Hours of use-it is of course open to Westminster to re-consult residents on changes to hours that CPZ operates.

Sustainability

It is the council's view that EIA will not be required in the light of what is known about the site and the information gathered from the previous application, the work carried out by the council in developing the SPD and the assessment of the significance of the likely effects on a scheme of this size, in this location. This will be kept under review if development proposals for the wider South Kilburn area emerge and proposals become firmer. It is the significance of likely environmental effects/impacts that drive the need for an Environmental Statements in this instance and not the size of the site per se.

Environmental Performance

Eco Homes Excellent ratings are sought in the SPD

Please liaise with our highways engineer Sean Dwyer (tel: 0207 6413326) on these matters.

Sustainability/Environmental impact

- An Environmental Impact assessment or something similar should be required due to the size of the site and its location adjacent to a major transport interchange.
- At the very least wind tunnel/daylight/sunlight and overshadowing assessment should be required.
- An Environmental Performance and sustainability statement should be required and any development should be designed for excellent eco homes rating.

Crime prevention

- It is considered of utmost importance that any proposal is designed to be secure. It is Important that overlooking/surveillance is maintained onto Kilburn Lane to ensure passive surveillance and safety/security. Should, as the SPD states, a pedestrian route be maintained through the site as a cut through from Kilburn Lane to the underground station, then this route needs to be carefully designed to avoid it becoming a crime hotspot. Many residents in Westminster will use the route to reach Queens Park Station and consideration needs to be given to 24 hour security guards, CCTV and good lighting.

Public realm/environmental improvements

- The existing public convenience within the site should be replaced within any new proposal.
- The public access through the site should be secured via a legal agreement to ensure it is not made private.
- Any environmental improvements to Kilburn Lane should include its south side which is within Westminster.

Comments from Westminster residents

Following on from the public meeting held on 10th January 2007, a range of comments were made, many of which were similar to the above observations. In addition I would like to highlight the following

and Environmental Performance is covered by the need for renewables and the need to meet the council's SPG19 sustainability checklist.

Crime Prevention

these matters will be dealt with in detail at the design stage and in achieving 'Secured by Design' status.

Public realm

all these matters are covered in the S106 section.

Comments from Residents

Residents raise a number of issues covered in council responses elsewhere. Two issues are considered here In terms of school facilities, the council will require payments to be made to provide additional school places created by the development and local schools can be expanded to meet demand. If the wider south Kilburn development takes place then proposals for a new enlarged school would be implemented.

Hyde Housing mangement

the council has set out its aspirations in terms of management and maintenance of any development and these reflect its planning power in these matters.

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| | <p>additional comments raised Westminster residents for your consideration;</p> <ul style="list-style-type: none"> •Concern about the number of people in the area and the ability of schools and support facilities to cope with this extra demand. •Concerned about the loss of a public car park, many residents would like the car park to stay or be replaced •Concerned about lots of residents and little parking in the development •Some residents would like to see a car free scheme •Residents would like to see other examples of Hyde Housing Association developments and how they manage their existing sites. •Concerned that Tesco's or another large supermarket chain will take up the smaller units and cause traffic problems. •Concern that not enough of the proposed housing will be affordable housing | | |
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**Representor : 181
M Adams
(SKNDC)**

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|---------------------------|--|---------------------------------|----------------|
| Queen's Park Station Area - Supplementary Planning Document | Support with conditions | <p>The NDC welcomes the draft SPD for the Queen's Park Station Area and supports the Development Principles set out in the document. It is a positive, thorough and forward looking document which is a substantial improvement and updating of the previous brief, especially the emphasis on sustainability which complements the existing South Kilburn SPD and Masterplan.</p> <p>The reservation we still have, as expressed in our letter of 18th August 2006, is on the limit of 12 storeys for the main development. Whilst we acknowledge and appreciate that the Council has done, and continues to do, some work to address our concerns about economic viability we remain concerned that this limit could jeopardise the financing of a new development and have a knock on effect on the Masterplan proposals for the Albert Road area.</p> <p>The NDC looks forward to working with the Council on the regeneration of this important area in</p> | Comments noted. | No change |

the coming months.

**Representor : 182
Stephanie Stuart**

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|---|---|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Observations | <p>I am concerned about this development on the following grounds:</p> <ol style="list-style-type: none"> 1) The security of the inner open space- will it be safe at night for pedestrians? will it be sufficiently used to avoid it becoming a focus for activities such as drug dealing & tacking, mugging (as has happened elsewhere in the locality) 2) The ability of the local infrastructure to accomodate extra residents; health, transport, parking and leisure facilities? I am in favour of a car free development and in favour of the proposed car club which I view as the way forward for inner city car use. 3) The sitting of the higher section of the development, it is my view that this should be sited at the corner abutting Queens Park Station and Saulsbury Road to maximise light and inner space. 4) Traffic management- has any impact assessment been done to take into account the effect of the congestion charge extension which will alter traffic patterns, I recommend that this is taken up and investigated before the final road and traffic light system is agreed. 5) Environmental impact- this needs to be looked at alongside the south kilburn estate, changes for impact on wind effects as well as for the extra load put on the local infrastructure. | <p>Security - any development will have to be built to "Secured by Design" standards to reduce the risk of crime, and also the residential units overlooking the courtyard will provide natural surveillance over the public area.</p> <p>Infrastructure - change recommended to emphasise importance of ensuring appropriate local infrastructure through use of planning obligations at objective 8 of SPD.</p> <p>Car Free- a car club scheme is expected to be provided on site for use of all local residents.</p> <p>Changed - recommending the wording of the SPD is altered to state a clear preference for the location of the tallest element (12 storeys) to be located adjacent to the station.</p> <p>Traffic - A full Transport Assessment will be required to be submitted as part of any planning application</p> <p>Environmental impact - At this stage it is not believed a full EIA is required (see response to Westminster), however this will be kept in review as and when South Kilburn proposals become firmer. Numerous studies have already been undertaken for the previous 26 storey application, which do not highlight any significant environmental impacts.</p> | No change |

Representor : 183
Victoria Secretan

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|---|--|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Observations | <p>Thank you for the opportunity to comment. It is very positive that public reaction led to a reconsideration of the original proposal. As I think the current plan has many advantages, I am writing in part to demonstrate that the opportunity to comment is welcome, though I have a little to add.</p> <p>Good design is inevitably subjective, but I appeal for the design to take into account a sense of human scale and of spirit, balanced with environmental concerns. There are signs that this is so, with the courtyard and pedestrian access being incorporated.</p> <p>Through a very different, commercial development, lessons might be learnt from the former sedgwick centre on the Aldgate roundabout, B1 with a shopping centre below ground. This was a failure and the main problem was a lack of physical and human connection between the 'island' and surrounding, different communities. It seems crucial that this Queens Park development is open to and used by residents from the surrounding area and others as much as possible.</p> <p>Queens Park has a noble history and a hip and happy present. Its crucial that its future retains and builds on these assets.</p> | Comments noted. No changes recommended. | No change |

Representor : 184
mr chris spencer

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|--------------------|--|--|---|-----------|
| Queen's Park Station Area - Supplementary Planning Document | Object | Yet another ill thought out planning scheme put into the community whithout any thought of the impact on the present resident population | We strongley object on the grounds that this is a gross over development of the area and reduces the quality of life for the residents that already reside within the area. Whist we aggree that it would be nice for some form of development to be undertaken to the area in question it needs to be of a lot lower key and of a nature that can add to the area and not detract as the present propasal shall. Until the proposal shows firm committment to be of benefit to the present residents we shall continue to object. Hollow promise of a adding a further medical surgery and a school to the area have been made but these must be firm prior to any development of this spralling nature. Firm committment | <p>Comments are noted.</p> <p>Infrastructure - change recommended to emphasise importance of ensuring appropriate local infrastructure is available to serve the new development through the use of planning obligations.</p> <p>A publicly accessible toilet is required as part of the S106 planning obligations, see section 6 of the SPD.</p> <p>The level of parking provided on site will</p> | No change |

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| | | | <p>must also be made to repalce the public WC and for it to be accesssable on a 24hour basis like the present one. Mitigation must be made for any impact on residential parking within the area this shall include a working policy to accommodate visitors to present residents. Finally, comprehensive traffic management plan must be in place prior to any development - WE MOST STRONGLY OBJECT TO A TRAFFIC SYSTEM WHICH PUT IDILING TRAFFIC OUTSIDE MY PROPERTY WHILST WAITING FOR TRAFFIC SINGALS TO PHASE - HENCE REDUCING THE QUALITY OF OUR PRESENT LIFESTYLE AND DEVALUING OUR PROPERTY - Chris & Sharon Spencer</p> | <p>ultimately be dependent upon viability. See comments to Westminster.</p> <p>A full Transport Assessment will be required to be submitted as part of any planning application, a junction layout has not been determined at this stage, and the council would expect an appropriate solution for the local traffic to be found.</p> | |
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**Representor : 185
Graham Saunders
(English Heritage)**

| Heading | Nature of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|---------------------------|--|---|----------------------------|
| Queen's Park Station Area - Supplementary Planning Document | Support with conditions | Support the promotion of good quality design and setting out of guiding principles. Suggest the principle of enhancing features of local distinctiveness is included. In particular there are many features of the historic environment that may not be statutorily protected, but yet help to provide a sense of place and meaning to the local community. This aspect of achieving quality design has not been sufficiently considered in the draft SA and SPD. Advises that the Council's own conservation staff are involved throughout the preparation and implementation of th SPD, as they are often best placed to advise on local historic environment issues and consideration of design options that would enhance the setting of the surrounding heritage assets such as conservation areas. | <p>Agreed that SPD should include some reference to enhancing features of local distinctiveness to help achieve a sense of place at section 4.2 under the quality in design heading.</p> <p>The council's conservation staff have been involved in the drawing up of the SPD and SA report and will continue to be involved in the implementation of these documents.</p> | Changes made as indicated. |

**Representor : 113
Mr David Furlong
(local resident - STT)**

| Heading | Nature of Response | Summary of Response | Response / Representation | Officer's Recommendation | Outcome |
|---|-------------------------|--|---|---|------------|
| Queen's Park Station Area - Supplementary Planning Document | Support with conditions | A few alterations for practical living | <p>I would like to state my support for the project, however I believe that the highest point of the tiered proposal is much better suited to the south-eastern portion of the site where I believe it will be the least conspicuous and in line with what had been the majority view of the stakeholders committee - of which I was part and present at each of the meetings. This would be a more appropriate entry point to the new development area and is a lower land area from the higher point - nearer the station. I would also like to see more street landscaping along Salusbury Road leading up to the bridge - at least some trees lining the street along the pavement to soften the effect of this development and stop it from looking like a Hammersmith-type development. The piazza I think is a good idea and hope that this will be well-lighted, CCTV present, well-patrolled, and not a haven for crime, urine, etc.</p> | <p>See changes made to all sections of the SPD referencing the location of the tallest element stating a clear preference for the tallest element at the north eastern corner. Recommend this for a number of reasons:</p> <ul style="list-style-type: none"> - it creates the least impact upon daylighting and sunlighting; - creates a landmark gateway to the Queen's Park area; - compliments development planned as part of the South Kilburn Masterplan. - Prevents overshadowing of the courtyard and residential units within the scheme - The residents and traders in the shops and flats on Kilburn Lane will feel less overlooked <p>This will not preclude development at the Falcon site if it can be demonstrated through innovative design that concerns over daylighting and sunlighting and impact on amenity of those on Kilburn Lane can be overcome.</p> <p>Section 4.7 of the SPD requires semi mature and mature ornamental tree planting and landscaping both within the courtyard and along the road frontage. A comprehensive landscaping strategy is also expected to be submitted as part of any planning application. See change already made to section 4.1 to emphasise the inclusion of trees to assist in increasing the ecological diversity of the site.</p> | No changes |

APPENDIX 2
DRAFT EXCLUSIVITY AGREEMENT

DRAFT

Bellway Homes (North London
Division)
Seaton Burn House,
Dudley Lane,
Seaton Burn,
Newcastle-upon-Tyne
NE13 6BE

Hyde Housing Association Limited
Leegate House,
Burnt Ash Road,
Lee Green,
London SE12 8RR

Taylor Woodrow Developments
Limited
2 Princes Way,
Solihull,
West Midlands,
B91 3ES 41

Dated

Dear Sirs

**Proposed Development of land at Kilburn Lane Brent (“the Site”):
Bellway Homes Limited (“Bellway”), Hyde Housing Association Limited
 (“Hyde”), Taylor Woodrow Limited (“Taylor Woodrow”) (together “the
 Consortium”) and the London Borough of Brent (“the Council”)**

In consideration of the Consortium incurring expense in developing proposals for the comprehensive redevelopment of the Site (shown for identification edged red on the attached plan) for the approval of the Council the Council undertakes separately with each member of the Consortium:

- in so far as the Council owns any estate or interest in the Site not to sell or transfer any estate or create any lease or tenancy in the Site to anyone other than a member of the Consortium nor agree to do so except where required by statute (also excluding any lettings of spaces in the public car park and any interests which may be created by existing tenants and beyond the control of the Council to reasonably refuse consent)
- not to advertise for sale entertain offers for or market the Site itself or through its agents
- not to invite offers from or enter into negotiations or continue negotiations with anyone other than the Consortium in relation to the redevelopment and disposal of any part of the Site
- during the period commencing with today’s date and ending 31 December 2007.

Yours faithfully

Duly authorised to sign

For an on behalf of the London Borough of Brent