

Ref	Name/ Organisation	Paragraph / Section	Officer Summary	Officer Response	Proposed Change
1	Resident 1	General	<p>What is your relationship to the Staples Corner area?</p> <ul style="list-style-type: none"> - <p>Are you generally supportive of the Staples Corner Design Code?</p> <ul style="list-style-type: none"> - <p>Please explain what, if anything, you like about the Design Code:</p> <ul style="list-style-type: none"> Ambitious nature of proposals – how can we push this further? <p>Please explain what, if anything, you do not like about the Design Code?</p> <ul style="list-style-type: none"> Greater focus on landscape/green space and active ground floors – linked with permeable surfaces and parks Private amenity/residential buffers Scale of buildings/height/wind 	<p>Noted – it is assumed the respondent would like to see greater focus on landscape and green space as well as active frontages, however this is not clear.</p> <p>Concerns relating to tall buildings and the environmental impacts of these are noted. As a Growth Area in the Brent Local Plan, a tall building zone has been designated to ensure that a minimum 2,200 homes can be delivered alongside industrial intensification and co-location.</p>	No proposed change.
2	Resident 2	General	<p>What is your relationship to the Staples Corner area?</p> <ul style="list-style-type: none"> I live there <p>Are you generally supportive of the Staples Corner Design Code?</p> <ul style="list-style-type: none"> Yes <p>Please explain what, if anything, you like about the Design Code:</p> <ul style="list-style-type: none"> I assume it is good because of how open it is to input <p>Please explain what, if anything, you do not like about the Design Code?</p> <ul style="list-style-type: none"> - 	<p>Noted – extensive engagement has been undertaken in the development of the draft Design Code and emerging Masterplan & Design Code SPD.</p>	No proposed change.
3	Resident 3	General	<p>What is your relationship to the Staples Corner area?</p> <ul style="list-style-type: none"> I live there <p>Are you generally supportive of the Staples Corner Design Code?</p> <ul style="list-style-type: none"> Yes <p>Please explain what, if anything, you like about the Design Code:</p> <ul style="list-style-type: none"> Green spaces, less traffic – more cycling <p>Please explain what, if anything, you do not like about the Design Code?</p> <ul style="list-style-type: none"> I would like there to be a good proportion of social housing 	<p>Noted – policies relating to affordable, and therefore social, housing are set out in both the adopted Brent Local Plan and London Plan.</p>	No proposed change.
4	Resident 4	General	<p>What is your relationship to the Staples Corner area?</p> <ul style="list-style-type: none"> None of the above (I live in Cricklewood) <p>Are you generally supportive of the Staples Corner Design Code?</p> <ul style="list-style-type: none"> Yes <p>Please explain what, if anything, you like about the Design Code:</p> <ul style="list-style-type: none"> Page 68 – North Circular Road: vital to move pedestrians and cycles away from kerb and fast moving traffic, which at present feels very dangerous. If necessary, reduce (sadly) planting width to ensure this. Pages 68-70 – Yes, do green the central reservation on A406 and A5 <p>Please explain what, if anything, you do not like about the Design Code?</p> <ul style="list-style-type: none"> M.08.C – elevate to ‘must’ support an at grade crossing. Though we can’t expect development to provide the crossing, its essential they don’t its eventual provision. 6.4-6.5 – good if complete. Removing parking but leaving road width would create a fast hostile road. 	<p>Figure 10 on page 68 shows a pedestrian path retained to both sides of the North Circular Road – this assumes a footway would need to be retained within the publicly owned highway in any future scenario. Therefore, a shared pedestrian and cycle path is shown as an alternative beyond a planted buffer, though this would need to be delivered on privately owned land, as and when individual sites came forward for redevelopment.</p> <p>Figure 10 on page 68 and Figure 12 on page 70 both show a “dry swale central reservation” – further consultation has been undertaken with TfL to understand if this is a viable aspiration. Greenery to central reservations is possible, and there are examples where has been implemented in other locations along the North Circular Road e.g. Bowes Park, however it can present challenges both in terms of visibility and maintenance.</p> <p>M.08.C sets out an aspiration for an at grade crossing at ‘Staples Cross’ – whilst strategically important for the movement network, it is not considered possible for this Design Code to enforce that it ‘must’ be delivered.</p> <p>Figure 16 on page 74 and Figure 18 on page 76 both show an aspiration for carriageway reductions along Coles Green Road</p>	<p>Figure 10 and Figure 12 to be updated to remove tree planting but retain aspiration for a dry swale/other SuDS intervention.</p> <p>M.08.C to be removed – commentary on the provision of a new at grade crossing to the NCR will be covered under ‘Infrastructure Projects’ in the emerging Masterplan & Design Code SPD.</p> <p>No proposed change to Figure 16 and Figure 18.</p>

				through the removal of on-street car parking – further consultation is required to understand if this is a viable aspiration.	
5	Resident 5	General	<p>What is your relationship to the Staples Corner area?</p> <ul style="list-style-type: none"> • None of the above <p>Are you generally supportive of the Staples Corner Design Code?</p> <ul style="list-style-type: none"> • Yes 	Noted.	No proposed change.
6	Resident 6	General	<p>What is your relationship to the Staples Corner area?</p> <ul style="list-style-type: none"> • None of the above <p>Are you generally supportive of the Staples Corner Design Code?</p> <ul style="list-style-type: none"> • Yes <p>Please explain what, if anything, you like about the Design Code:</p> <ul style="list-style-type: none"> • It cleans up the area. <p>Please explain what, if anything, you do not like about the Design Code?</p> <ul style="list-style-type: none"> • There is no extension of the Brent Reservoir Parkland North of the A406 	<p>Noted.</p> <p>Brent Reservoir is subject to multiple designations that protect its role as an important part of Brent’s green infrastructure. Whilst there are no plans to formally extend the protected area, the ‘Green & Blue Infrastructure Strategy’ in the emerging Masterplan sets out an ambition for ‘green fingers’ that pull the existing character of Brent Reservoir into the neighbouring sites. In addition, development proposals on neighbouring sites will need to provide greenery along the boundary.</p>	No proposed change.
7	Resident 7	General	<p>What is your relationship to the Staples Corner area?</p> <ul style="list-style-type: none"> • None of the above <p>Are you generally supportive of the Staples Corner Design Code?</p> <ul style="list-style-type: none"> • Yes 	Noted.	No proposed change.
8	Resident 8	General	<p>What is your relationship to the Staples Corner area?</p> <ul style="list-style-type: none"> • None of the above <p>Are you generally supportive of the Staples Corner Design Code?</p> <ul style="list-style-type: none"> • Yes 	Noted.	No proposed change.
9	Resident 9	General	<ul style="list-style-type: none"> • Clearly. the hostile severance caused by the A5 and NCR are the biggest problems. Maximise the ped/cycle routes to the Welsh Harp. • Roads are supposed to have movement functions, but also urban grain and design functions. (Boris's 'Roads Taskforce' made a big play of that when he was Mayor.) • It should not be unpleasant to be on the pavements there - but it is. • See if TfL will allow a signal-controlled at-grade crossing of the two NCR slip-roads, which would need some excavation of the concrete embankment under the high flyover, to get from one side of the road to the other. • Use the 'Staples Corner' logo as sculpture wherever you can. • Maybe narrow, vertical enamelled panels on stainless steel backing would last 20 years-plus. Plenty of SuDS as well. • Brand Staples Corner roads with special streetlights that have additional (say) blue LEDs at the other end of the lighting arms, like at Willesden Junction Station Approach. • See the rest of the new, OPDC-funded street furniture at Willesden Junction, just added and all ultra-strong to deter vandalism. • Be inspired (which is not something you can often say about the OPDC). • With LB Barnet and TfL, change the four slip roads on the A5 so they are narrower.. Plant trees. • This is not a 70 mph road, but it was built as that. Put some narrow trees down the middle of the A5 viaduct, not where it is supported by concrete but nearer the start and finish. 	<p>Noted.</p> <p>The importance of new and improved pedestrian and cyclist connections across Staples Corner, and particularly to green infrastructure, is consistently promoted through the Design Code. The next iteration of the Design Code will focus on streetscape and character and continue to show how the public realm can be improved to support active travel etc.</p> <p>M.08.C sets out an aspiration for an at grade crossing at ‘Staples Cross’ – whilst strategically important for the movement network, it is not considered possible for this Design Code to enforce that it ‘must’ be delivered.</p> <p>The ‘Staples Corner’ logo is intended to be part of an area-wide branding strategy to give Staples Corner a clear and recognisable identity. It is hoped this will become part of a signage and wayfinding strategy in the future, though it should be noted that the design may be further developed.</p> <p>All adopted highways and associated streetscapes, including street lighting and furniture, will need to be designed and built to the relevant standards – see Brent Placemaking Guide 2011.</p> <p>Edgware Road is jointly managed by LB Brent and LB Barnet and the majority of the flyover and associated slip roads is within LB Barnet ownership. It is considered that the stretch of Edgware Road between Staples Corner and West Hendon is predominantly over-engineered, though any proposals to significantly alter the road layout would need to be developed collaboratively and subject to comprehensive highways modelling.</p>	<p>No proposed change.</p> <p>Commentary on the provision of a new at grade crossing to the NCR will be covered under ‘Infrastructure Projects’ in the emerging Masterplan & Design Code SPD.</p>

			<ul style="list-style-type: none"> Redesign the A5 slip road junctions with the main carriageway to be sharper, to deter high speeds. 		
10	Resident 10		<p>What is your relationship to the Staples Corner area?</p> <ul style="list-style-type: none"> None of the above <p>Are you generally supportive of the Staples Corner Design Code?</p> <ul style="list-style-type: none"> No <p>Please explain what, if anything, you like about the Design Code:</p> <ul style="list-style-type: none"> I understand the concept approach. <p>Please explain what, if anything, you do not like about the Design Code?</p> <ul style="list-style-type: none"> Everybody has known for many years that the Edgware Road / North Circular junction and developed environment north, south, east and west amount to a land use mess. It is deeply flawed. I simply don't see the point of having and consulting on a renewal project which ignores the overall area. The same mistake was made with the new Brent Cross retail consultation - which, by the way, hid the fact that shoppers would be charged for parking, as at Westfield. 	<p>Noted – LB Brent have signed a Statement of Common Ground with LB Barnet to enable joint-working across the Staples Corner, Brent Cross West and Brent Cross Growth Areas, develop plans for growth and ensure that the potential for a coordinated masterplan for the area is fully explored.</p> <p>Policy BEGA2A of the Brent Local Plan also confirms the council's commitment to joint working with LB Barnet who are responsible for the Brent Cross and Brent Cross West Growth Areas, <i>"Working closely with LB Barnet and the Greater London Authority, the Council will seek to as best possible link it with and complement the Brent Cross Opportunity Area. It will also maximise the potential of the area to benefit from improved public transport connectivity to Central London and beyond provided by the new Brent Cross West Thameslink station and the potential West London Orbital."</i></p>	No proposed change.
11	Resident 11	General	<p>What is your relationship to the Staples Corner area?</p> <ul style="list-style-type: none"> - <p>Are you generally supportive of the Staples Corner Design Code?</p> <ul style="list-style-type: none"> - <p>Please explain what, if anything, you like about the Design Code:</p> <ul style="list-style-type: none"> I like the idea between green area trees and road connecting. It doesn't look then industrial area. in London is difficult to walk in polluted area. this design will add a lot and help to improve the city. <p>Please explain what, if anything, you do not like about the Design Code?</p> <ul style="list-style-type: none"> - 	Noted.	No proposed change.
12	Resident 12	General	<p>What is your relationship to the Staples Corner area?</p> <ul style="list-style-type: none"> I live there <p>Are you generally supportive of the Staples Corner Design Code?</p> <ul style="list-style-type: none"> Yes <p>Please explain what, if anything, you like about the Design Code:</p> <ul style="list-style-type: none"> Accounts for many different, interlocking dimensions <p>Please explain what, if anything, you do not like about the Design Code?</p> <ul style="list-style-type: none"> It's very thorough but too much information there - difficult to grasp what the actual vision and plan is 	Noted – as this Design Code is developed and integrated into the emerging Masterplan & Design Code SPD, it will be streamlined, with much of its content superseded by the relevant spatial strategies of the masterplan.	No proposed change.
13	Resident 13	General	<p>What is your relationship to the Staples Corner area?</p> <ul style="list-style-type: none"> None of the above <p>Are you generally supportive of the Staples Corner Design Code?</p> <ul style="list-style-type: none"> Yes <p>Please explain what, if anything, you like about the Design Code:</p> <ul style="list-style-type: none"> It currently looks so neglected and quite honestly like some third world country. It is so dirty, the streets have plastic hanging off plants. No one ever cleans or sweeps it. The concrete from the A406 looks so drab on the underside and together with the dirt, rubbish build up, abandoned trolleys, and other items it resembles a third-world country. <p>Please explain what, if anything, you do not like about the Design Code?</p>	<p>Noted – fly-tipping should be reported to the council via the website: https://www.brent.gov.uk/parking-roads-and-travel/roads-and-streets/street-cleaning/flytipping</p>	No proposed change.

			<ul style="list-style-type: none"> There is no mention of who and how all your improvements will be maintained and kept clean. Currently all 3 councils responsible have abandoned all responsibility. 		
14	Resident 14	General	<p>What is your relationship to the Staples Corner area?</p> <ul style="list-style-type: none"> I live there <p>Are you generally supportive of the Staples Corner Design Code?</p> <ul style="list-style-type: none"> Yes <p>Please explain what, if anything, you like about the Design Code:</p> <ul style="list-style-type: none"> - <p>Please explain what, if anything, you do not like about the Design Code?</p> <ul style="list-style-type: none"> - 	Noted.	No proposed change.
15	Resident 15	General	<p>What is your relationship to the Staples Corner area?</p> <ul style="list-style-type: none"> I live there <p>Are you generally supportive of the Staples Corner Design Code?</p> <ul style="list-style-type: none"> Yes <p>Please explain what, if anything, you like about the Design Code:</p> <ul style="list-style-type: none"> - <p>Please explain what, if anything, you do not like about the Design Code?</p> <ul style="list-style-type: none"> - 	Noted.	No proposed change.
16	Resident 16	General	<p>What is your relationship to the Staples Corner area?</p> <ul style="list-style-type: none"> I live there <p>Are you generally supportive of the Staples Corner Design Code?</p> <ul style="list-style-type: none"> No 	Noted.	No proposed change.
17	Resident 17	General	<p>What is your relationship to the Staples Corner area?</p> <ul style="list-style-type: none"> I live there <p>Are you generally supportive of the Staples Corner Design Code?</p> <ul style="list-style-type: none"> Yes <p>Please explain what, if anything, you like about the Design Code:</p> <ul style="list-style-type: none"> I like the job creation – good to see the area being regenerated. Creation of a new leisure facility. Support the aim of reducing traffic pressure in a very congested area. Would like to see a technical training college. Like to see pocket parks. <p>Please explain what, if anything, you do not like about the Design Code?</p> <ul style="list-style-type: none"> No mention of passenger traffic pressure around Brent Cross West station – no facility to pick up/drop off passengers. 	<p>Noted - there are no plans for a technical training college in this area currently. The College of North West London is in the process of rationalising its campuses on to a new site in Wembley. Within Brent Cross Town adjacent to the Brent Cross West station, Sheffield Hallam University in opening a London based campus. It is not yet clear what the focus of this will be in terms of courses.</p> <p>Issues relating to capacity for pick up/drop off at the new Brent Cross West station were raised by LB Brent as part of the consultation process. Any resolution to these issues is the responsibility of LB Barnet and Network Rail.</p>	No proposed change.
18	Resident 18	General	<p>What is your relationship to the Staples Corner area?</p> <ul style="list-style-type: none"> I live there <p>Are you generally supportive of the Staples Corner Design Code?</p> <ul style="list-style-type: none"> Yes <p>Please explain what, if anything, you like about the Design Code:</p> <ul style="list-style-type: none"> All looks good <p>Please explain what, if anything, you do not like about the Design Code?</p> <ul style="list-style-type: none"> New development – needs improving. 	Noted – as part of an illustrative vision for the area, any new development shown in drawings and visualisations is purely indicative and does not represent final proposals.	No proposed change.

19	Resident 19	General	<p>What is your relationship to the Staples Corner area?</p> <ul style="list-style-type: none"> I live there <p>Are you generally supportive of the Staples Corner Design Code?</p> <ul style="list-style-type: none"> Very vague at the moment <p>Please explain what, if anything, you like about the Design Code:</p> <ul style="list-style-type: none"> Greening and industrial area for employment opportunities <p>Please explain what, if anything, you do not like about the Design Code?</p> <ul style="list-style-type: none"> I am concerned about the proposed bulking on the site 	<p>Noted – this Design Code is at an early stage and will be developed and integrated with the emerging Masterplan & Design Code SPD in due course.</p> <p>Retention and intensification of the existing industrial uses at Staples Corner is key to the planning policy objectives for the area. As is the provision of enhanced greenery across the area, including the provision of pocket parks.</p> <p>Building heights are indicative at this stage, with further detail to be set out within the emerging Masterplan & Design Code SPD.</p>	No proposed change.
20	Brent & Westminster Swifts Group	General	<ul style="list-style-type: none"> In summary, please include swift bricks in accordance with best-practice guidance in new developments in Staples Corner. 	Noted – see below.	See below.
21	Brent & Westminster Swifts Group	5.2 Nature	<ul style="list-style-type: none"> In more detail, the Nature section is welcome, but the reference to "Support wildlife nesting" is vague and has no associated design code. In particular with regard to nest provision, the value of swift bricks is highlighted in national planning guidance (NPPG 2019 Natural Environment paragraph 023), and also bird bricks are mentioned in the biodiversity sections of the National Model Design Code guidance (e.g. pages 25-26, https://www.gov.uk/government/publications/national-model-design-code). The Brent Sustainable Environment & Development SPD (June 2023) makes several references to the importance of swifts and swift bricks, in particular highlighting that they are excluded from the Biodiversity Net Gain metric (see sections 3.5.1, 3.5.3, and 3.6.6 (d)). Swift bricks are a universal nest brick for small bird species, and preferable to external nest boxes due to a long lifetime, zero maintenance, better thermal regulation with future climate change in mind, and aesthetic integration with the design of the building. Swifts are a red-listed species in the UK due to rapidly declining numbers but are nesting on the southern edge of the Staples Corner site on Oxgate Gardens, as well as nearby in Dollis Hill and Cricklewood, as shown by RSPB Swift Mapper (https://www.swiftmapper.org.uk/). Brent Reservoir is well known for its value as a foraging site for swifts (e.g. they are listed as being recorded here: https://brentres.wordpress.com/birds/). Therefore, please include swift bricks in accordance with best practice guidance such as BS 42021:2022, or CIEEM (https://cieem.net/resource/the-swift-a-bird-you-need-to-help/), in new developments in Staples Corner. 	Noted – whilst important, it is considered to be too specific and would necessitate that similar detailed guidance be provided for other relevant species.	No proposed change.
22	Barnet Council	General	<ul style="list-style-type: none"> As highlighted in the latest version of the Statement of Common Ground (February 2022) between LB Barnet and LB Brent both councils share the desire for joint-working to develop plans for growth and ensure that the potential for a co-ordinated masterplan for the area is fully explored. It is agreed between the two boroughs that all developments on sites within the Brent Cross West (Staples Corner) Growth Area and the adjoining Staples Corner Growth Area will be expected to contribute proportionately towards the cost of delivering the infrastructure improvements necessary to support this growth. We will work 	Noted – the council remains committed to joint working with LB Barnet as set out in the terms of the Statement of Common Ground.	No proposed change.

			with LB Brent and Transport for London to agree a scheme for improving the Staples Corner junction.		
23	Barnet Council	General	<ul style="list-style-type: none"> Barnet's Local Plan Examination is at an advanced stage and the Council expects to formally publish Proposed Modifications to the Local Plan by the end of the year. Revisions to the Local Plan Key Diagram and Growth Area maps will clarify the extent of these locations. Through identified developable and deliverable sites substantial capacity to accommodate new homes, jobs and infrastructure will be realised in Barnet's Growth Areas. We would therefore like to see the Brent Cross West (Staples Corner) Growth Area reflected on Map 1. 	The status of the emerging Barnet Local Plan, and therefore the Brent Cross West (Staples Corner) Growth Area, is noted.	Map 1 to be omitted from the Design Code but Brent Cross West (Staples Corner) Growth Area will be identified under 'Policy Context' in the emerging Masterplan & Design Code SPD.
24	Barnet Council	General	<ul style="list-style-type: none"> We support the design aspirations in the document which appear as well articulated principles and design guidance for good practice. Evidently informed by the National Model Design Code (NMDC), the document includes the driving vision, thematic guidance aptly based around the 10 Characteristics of Well Designed Places featured in the NMDC and specific guidance for 4 priority areas. Guidance is generally outline and/or qualitative in nature, and solutions might be somewhat open to interpretation in response. The document is quite long and it would be good to highlight key priorities including those relating to Brent Cross Cricklewood. More detailed and quantitative design coding is provided for street design typologies. Further such detailed design coding is otherwise absent, though might be provided at a later date, possibly in partnership with prospective developers. 	As this Design Code is developed and integrated into the emerging Masterplan & Design Code SPD, it will be streamlined, with much of its content superseded by the relevant spatial strategies of the masterplan. The next iteration of the Design Code will focus on streetscape and character, and where specific design codes are to be retained or added, these will be made more quantitative, where possible, to give greater certainty.	Section 6 to be updated.
25	Barnet Council	General	<ul style="list-style-type: none"> Illustrated and drawn proposals are tantalising limited, seemingly due to the masterplan being at an earlier stage of production. As a result, it is sometimes difficult to visualise the overarching interconnected vision and rationale with regard to land uses, densities, built form, landscape etc. If possible, we would advise the design code is paused and consulted on together with the masterplan to maximise consistency and synergy, or updated once the masterplan catches up. 	As set out in paras 4.1.2 to 4.1.5, this Design Code was consulted on in advance of the masterplan as a 'moment in time' to help shape the Masterplan's ongoing development and provide a relative degree of certainty to potential applicants. All illustrations to be retained will updated accordingly.	No proposed change.
26	Barnet Council	General	<ul style="list-style-type: none"> Overall, we feel the design codes are a positive step for Staples Corner and the A5, in particular the public realm aspirations. However, we are concerned about the fragmented approach to massing along 'The Broadway' where tall buildings are proposed on 2-storey podiums. As part of the coordination between the work the London Borough of Barnet are doing for Brent Cross West (Staples Corner) Growth Area, and Brent's emerging masterplan for Staples Corner, we would like to consider how the design code could ensure a cohesive approach to building frontage along the A5 on both sides. 	<p>In lieu of the Masterplan, any massing shown in drawings and visualisations is purely indicative at this stage. However, even once the Masterplan & Design Code SPD is consulted on and adopted, any massing will remain indicative and development proposals will be assessed on a case-by-case basis.</p> <p>Notwithstanding, this Design Code can start to give greater clarity to how massing should develop along Edgware Road, and this will be explored in the next iteration in collaboration with LB Barnet.</p>	7.2 to be removed.
27	Barnet Council	General	<ul style="list-style-type: none"> We welcome the reference at para 2.23 and Map 12 to the Locally Important View from Golders Hill Park towards Harrow on the Hill which goes through the Growth Area. It would be good to clarify that this view is protected in Barnet's Local Plan. We would also suggest the Map 12 is renamed as Views of Importance. 	Noted – though relates to para 2.6.3.	Commentary on views of importance will be covered under 'Intensification/Optimising Sites and Building Heights' in the emerging Masterplan & Design Code SPD.
28	Barnet Council	General	<ul style="list-style-type: none"> In partnership with the Brent Cross Cricklewood initiative, we would advise the design code further explores (or identifies for further study/agreement) possible cross-cutting opportunities, e.g. safe, direct and desirable foot and cycle access to and 	Noted.	No proposed change.

			around Brent Reservoir and alongside the Brent River linking to Brent Cross Shopping Centre.		
29	Barnet Council	General	<ul style="list-style-type: none"> We would be keen to see more on how model shift will be encouraged to minimise car usage including affecting Barnet, e.g. considering sustainable transport provision, car sharing, car parking, the distribution of housing densities and walkability to amenities. 	Noted.	Commentary on modal shift will be covered under the 'Walking and Cycling Strategy' in the emerging Masterplan & Design Code SPD.
30	Barnet Council	General	<ul style="list-style-type: none"> Existing Brent Cross Cricklewood proposals should be quickly outlined for context and promoting compatibility, e.g. Brent Cross West Masterplan (and especially the A5 interface) and proposals to improve the Staples Corner junction. 	Noted – though until such proposals are in the public domain, it is not considered appropriate to make detailed reference to them in the emerging Masterplan & Design Code SPD.	No proposed change.
31	Barnet Council	General	<ul style="list-style-type: none"> We would suggest identifying the emerging local retail hierarchy (including Brent Cross Town and Brent Cross Shopping Centre), including walkable catchments, and how proposed mixed use development at Staples Corner would suitably add into this. 	Noted – reference will be made to local retail facilities in the 'Activation Strategy' of the emerging Masterplan & Design Code SPD.	No proposed change.
32	Capital Industrial LLP (owner of Atlas Business Centre)	General	<ul style="list-style-type: none"> It is apparent that elements of Atlas Business Centre are considered to be key features of the local industrial scene. It should be noted that although architecturally interesting (in parts), the buildings are becoming obsolete from an industrial use perspective with low eaves heights and tight access limiting their appeal to typical light industrial users. Redevelopment of part for more modern industrial space should be considered. We generally agree with the principle of intensifying the front of the site along Oxgate Lane through the provision of additional apartments, creative and office space. 	Noted.	No proposed change.
33	Capital Industrial LLP (owner of Atlas Business Centre)	6.3 Oxgate Lane	<ul style="list-style-type: none"> We are not in favour of reducing the road width of Oxgate Lane from 9.3m to 7.5m. This is a significant arterial route servicing numerous businesses along Oxgate Lane with notable HGV movements. Cycle routes should instead be located on quieter streets away from commercial vehicle movements 	Potential future road widths have been initially tested with LB Brent transport officers and are based on the servicing strategy developed as part of the emerging Masterplan & Design Code SPD	
34	Capital Industrial LLP (owner of Atlas Business Centre)	7.3 Oxgate Lane	<ul style="list-style-type: none"> Car parking needs to be provided on Oxgate Lane. Parking within Atlas Business Centre is limited given the number of units and businesses operating from the estate and workers/visitors will need to be able to park on the street. 	<p>P.17.C states that <i>"Car parking must not be provided at the front of sites along Oxgate Lane."</i> This code relates specifically to on-plot car parking and seeks to avoid creating vehicle dominated frontages to Oxgate Lane.</p> <p>On-plot car parking could still be considered acceptable, but only if located within the depth of a site e.g. within a courtyard etc.</p> <p>In support of this P.19.C states that <i>"Car parking should be provided within development sites, or on-street in small clusters to meet London Plan standards."</i> allowing some flexibility in how P.17.C is applied.</p>	<p>P.17.C to be updated – see P.02.OGL <i>"Car parking must not be provided at the front of sites along Oxgate Lane to avoid creating vehicle dominated frontages."</i></p> <p>P.19.C to be updated – see P.03.OGL <i>"Car parking should be provided on plot, where possible, or along Oxgate Lane in small clusters of no more than two bays, to meet London Plan standards."</i></p>
35	Capital Industrial LLP (owner of Atlas Business Centre)	7.3 Oxgate Lane	<ul style="list-style-type: none"> Vehicular access cannot be limited at any time. There are a considerable number of businesses on Oxgate Lane and as such vehicular movements should not be limited or controlled. Many of the businesses on Atlas Business Centre operate 24/7. 	Noted.	M.20.C to be removed. Further information on servicing will be covered under the 'Growth Area Servicing Strategy' in the emerging Masterplan & Design Code SPD.
36	Capital Industrial LLP (owner of Atlas Business Centre)	7.3 Oxgate Lane	<ul style="list-style-type: none"> Vehicular entrances should NOT be reduced for Atlas Business Centre. The existing one-way system with an entrance and separate exit is essential. N.B the exit roadway is obviously shared with adjacent site, Oxgate House. 	Noted.	P.18.C to be removed.
37	Capital Industrial LLP (owner of Atlas Business Centre)	7.3 Oxgate Lane	<ul style="list-style-type: none"> The existing car park at Atlas Business Centre is shown as a shared courtyard and amenity space. This will not be possible due to the already limited amount of parking for existing 	It is considered that the projected increase in PTAL, particularly in the Oxgate Lane area, will support a reduction in car parking demand though this cannot be achieved on privately owned land unless these sites come forward for redevelopment.	Figure 27 to be removed.

	Business Centre)		businesses. No additional parking can be lost at Atlas Business Centre		
38	Capital Industrial LLP (owner of Atlas Business Centre)	7.3 Oxgate Lane	<ul style="list-style-type: none"> Access to unit 8 (carpet wholesaler) is direct from Oxgate Lane and has been lost on page 98. This will obviously need to remain. 	Noted.	Figure 27 to be removed.
39	Canal & River Trust	1.5.9	<ul style="list-style-type: none"> We note reference to Transitional Area A, close to the Trust's boundary and the reservoir. <p><i>This is considered an area of strategic importance that could deliver better connectivity between the Growth Area and the surrounding green assets.</i></p> <ul style="list-style-type: none"> The Trust are currently developing two funding proposals, to address habitat conservation, signage, and community engagement activities, and are keen to promote access and circular walk improvements. We would be pleased to work closely with the borough, particularly regarding the Staples Corner development proposals, to improve access to the reservoir, but also on how to address the longer-term mitigation needed for its likely associated increased use. The Trust welcomes and supports engagement and volunteering with new and existing residents and businesses around the reservoir. 	<p>Noted.</p> <p>Whilst the ambition is for this Design Code is to apply to those edges or 'transitional areas' that straddle the Growth Area boundary and are principally focussed on where the industrial uses of Staples Corner directly interface with neighbouring residential uses, they are undesignated within the Brent Local Plan. It is therefore difficult to include them within the emerging Masterplan & Design Code SPD, and risks causing confusion as to where the SPD does and does not apply.</p>	All references to transitional areas to be removed.
40	Canal & River Trust	4.3 Character Areas (6. Brentwater)	<ul style="list-style-type: none"> The implementation of enhanced green buffer zones around the new developments will be key in helping to lessen disturbance to Brent Reservoir from the proposed 2,200 new homes, and their residents' likely associated use of this valuable open space for leisure. 	Noted.	4.3 to be removed.
41	Canal & River Trust	5.2 Nature (Figure 4: Green and blue infrastructure)	<ul style="list-style-type: none"> We note reference to swales and water features in the area close to the Brent Reservoir. There is a lot of contaminated land in the Staples Corner area, and it appears there are also surface water discharges that discharge poor water quality into the reservoir, adversely affecting its overall water quality. Swales and water features potentially introduce further contamination risk to the reservoir, and future developments should be designed to avoid poor water quality discharges, and work to improve existing surface water discharges and other water sources that reach the reservoir. The reservoir also suffers from fly-tipping from adjacent properties, and developments coming forward should be designed to prevent opportunities for this. The River Brent trash screen at Brent Reservoir, owned by the Environment Agency, is not regularly cleaned and maintained, and many wet wipes and other waste from the River Brent enter the Brent Reservoir here. A large development close to the reservoir previously helped to fund a part time dedicated ranger of the SSSI, and this could help manage this sort of issue. 	Noted – matters relating to SUDS and water generally are covered under 'Green and Blue Infrastructure' in the merging Masterplan & Design Code SPD.	5.2 to be removed.
42	Dollis Hill Residents' Association (DHRA)	General	<p><u>Trees and Green Space</u></p> <ul style="list-style-type: none"> The design code needs to ensure green space between buildings and the responsibility for maintaining it. Trees are needed. Adjacent plots that are developed at different times need to allow for this in the gaps they leave around buildings at the edge of their plot, as well as between buildings on their plot. 	Urban Greening Factor and Biodiversity Net Gain targets will require that green space is provided on development sites, with appropriate mitigation required where targets cannot be met. Application of existing supplementary planning documents as part of the development management process will inform what form this green space will take, where it is located and how it will be maintained/managed.	No proposed change.

			<ul style="list-style-type: none"> Children must have space to play and clean air to breathe. Workers must be able to take lunch breaks in clean open air. Can roof gardens be stipulated on residential and commercial buildings? On large buildings they can include exercise areas. In Copenhagen they have a running track, outdoor gyms and children's playground on the flat roof of flats. Residential and business buildings can surround central piazzas which all can overlook, giving a sense of local community. Within the whole development area there need to be some central green spaces where residents can relax and children can play. Housing should not fill a whole plot without green space, specifically because there is much traffic and industrial use nearby. Noise mitigation needs to be encouraged between developments, not only along the roads. Tall buildings can reflect noise and industry can create noise. Developers for each plot need to contribute to the green space and make clear how its upkeep will be maintained. How can each development be urged to contribute to cutting the impact of the traffic and industrial noise? 	<p>Playspace requirements are set out by the GLA and design codes P.11.A, P.08.B, P.12.B, P.14.B and P.28.C all make reference to where the provision of playspace within the public realm is suggested.</p> <p>The Residential Amenity Space & Place Quality SPD deals with the need to address noise impact on prospective outdoor amenity spaces. In relation to noise generated by industry and its impacts on residential uses, London Plan Policy D13 agent of change principle sets out the steps developments need to take to ensure satisfactory environments/no unreasonable restrictions placed on developments.</p>	
43	Dollis Hill Residents' Association (DHRA)	2.3 Walking and Cycling	<ul style="list-style-type: none"> Walking routes around the area do not include the path through the woods south of Brent Reservoir, that terminates just past the sluice on the River Brent opposite the T junction in Priestley Way. There is a path all along the southeast part of Brent Reservoir. It goes through the woods. The double gate for lorry access to the sluice is always locked, but pedestrians can easily get out over the railings and a step near where the bridge on Priestley Road starts. That whole area should be improved. The attached image shows where the sluice and vehicle gates are on Priestley Way. 	Noted – the accessibility of this path was investigated and confirmed.	Map 5 to be removed – walking routes will be mapped and covered under the 'Walking and Cycling Strategy' in the emerging Masterplan & Design Code SPD.
44	Dollis Hill Residents' Association (DHRA)	2.4 Notable Local Assets (Heritage Assets)	<ul style="list-style-type: none"> Heritage Assets should include the footprint of Dollis Hill House in Gladstone Park. Your maps stretch up towards West Hendon but not southwards towards Gladstone Park. https://www.dollishillhouse.org.uk/history.htm The building was listed but then demolished, with the footprint and lower walls retained, as well as signboards about the history (attached). I have copies of them because I was chair of the Dollis Hill House Trust that designed the boards in the park. The Post Office Research Station in Brook Road is shown by a green block but not named - it is useful to name such an important building that was part of breaking the code in the war and still has a WWII bunker. You mention the bunker at 403-405 Edgware Road. A plaque on the building states that it is also "HEALTH & SAFETY EXECUTIVE The Occupational Medicine and Hygiene Laboratories" and the sign above the doorway states "George VI R 1940". This can be included in the description of assets. 	Noted – the extents of Map 7 are consistent across all maps of the same scale and do not extend as far as Gladstone Park.	Map 7 to be removed.
45	Dollis Hill Residents' Association (DHRA)	4.3 Character Areas (3. Oxgate & Humber)	<ul style="list-style-type: none"> "Opportunity for high-density development" is concerning for many local residents. This area includes many current low-rise homes which do not want to be overwhelmed. Overlooking, overwhelming etc are not acceptable to local residents. 	Noted – any development proposals located adjacent to existing residential properties will need to meet the requirements of SPD1 Brent Design Guide in terms of overlooking and privacy, as well as other guidance relating to daylight/sunlight.	4.3 to be removed.
46	Dollis Hill Residents' Association (DHRA)	5.1 Movement (Figure 3: Movement network principles)	<ul style="list-style-type: none"> Please make sure that the River Brent restoration route connects to the pathway along the south of the Welsh Harp 	Noted.	Figure 3 (and Figure 4) to be removed.

47	Dollis Hill Residents' Association (DHRA)	6.2 Edgware Road	<ul style="list-style-type: none"> Traffic on the northbound A5 needs to flow quickly and not get backed up at the Staples Corner intersection. The plans for the A5/A406 intersection have changed over the years that the Brent Cross Cricklewood development has been under discussion. We have objected to the traffic modelling for it as far back as 2007. It has not reflected the long tailbacks on the northbound A5 and the consequent number of vehicles cutting through onto side streets. We must not have northbound A5 lanes removed from car/lorry use by being dedicated to buses or bicycles, as shown in section 6.2. Fewer lanes for cars/lorries causes vehicles to cut through the local residential streets to avoid waiting in a traffic jam of slowly crawling northbound vehicles. The backup of northbound traffic due to the poor design of the Staples Corner intersection encourages vehicles to cut through the residential areas such as along Dollis Hill Lane and Crest Road. The Staples Corner design code must include the need to keep vehicles away from the residential areas just south and west of the development area. Sustainable transport plans need to take into account the impact of all the vehicles using the new industrial area and those that are just travelling north along the A5 to reach the A406, which must be deterred from cutting through residential areas. This is in addition to the routing of lorries only along roads in the industrial area, and making it absolutely clear through signage and apps the routes they should take to enter the area and leave it for all directions of travel (e.g. to exit eastbound on the A406 or southbound on the A5, or to enter from the eastbound A406). The design code for streets does not include Staples Corner itself. Even though this is not a Brent street, it must be designed to keep traffic moving quickly and not backing up along the A5, Oxgate Lane etc. The whole Staples Corner design guide must not omit Staples Corner itself. To decrease congestion, I have shown Barnet Council highways engineers during a site visit that it would be possible to create a right-turn lane into Oxgate Lane from the southbound A5 bridge. It would have a traffic light for only the right turn traffic, while the other lane across the bridge would drive south along the A5 as it does now, with no traffic light. No vehicle entering the southbound A5 from the Staples Corner roundabout would be able to turn right into Oxgate Lane. Southbound A5 traffic coming across the flyover currently makes U-turns in the petrol stations on the A5 so that it can then turn left into Oxgate Lane. It could also be possible to turn left out of Oxgate Lane onto the A5 flyover using traffic lights, thus reducing the congestion at Staples Corner that these northbound vehicles currently cause. 	<p>Noted – in accordance with the Mayor’s Transport Strategy, the aim of this Design Code and the emerging Masterplan & Design Code SPD is to support modal shift, by increasing levels of walking, cycling and public transport use, and decreasing vehicle dependency across Staples Corner and the surrounding area.</p> <p>To facilitate this modal shift, the appropriate infrastructure must be delivered, and this Design Code sets out aspirations for what form this could take across a number of key streets within Staples Corner. These aspirations have been tested with LB Brent officers and are informed by more detailed work undertaken by transport planners and engineers at Alan Baxter Associates. This work has also informed the relevant spatial strategies that will be covered in the emerging Masterplan & Design Code SPD, though it is worth highlighting that none of the options consider a right turn into Oxgate Lane from Edgware Road safe or viable.</p> <p>Notwithstanding, concerns that significant alterations to the road network could lead to further congestion and the potential displacement of traffic from Edgware Road onto local/residential roads are understood.</p>	No proposed change.
48	Dollis Hill Residents' Association (DHRA)	P.04.C, P.10.C, P.15.C, P.22.C	<ul style="list-style-type: none"> Sections 7.1 to 7.4 each include “<i>Development proposals must take a proactive rather than reactive approach to designing out crime.</i>” Please can this be strengthened. Please include conditions to design out crime following the Secured by Design development guides. Please require inclusion of a police designing out crime officer in pre-submission meetings with planners. Possible wording might be: <p><i>“Development proposals must design out crime actively by following the Secured by Design development guides and consulting police designing out crime officers at the earliest stage.”</i></p>	Noted – the same or similar wording will be incorporated.	P.04.C, P.10.C, P.15.C and P.22.C to be removed and replaced with an area-wide design code in the emerging Masterplan & Design Code SPD – see P.02.

49	Dollis Hill Residents' Association (DHRA)	7.1 Staples Cross	<ul style="list-style-type: none"> M.10.C states "Pedestrian and cyclist links to the Brent Reservoir could be provided from Priestly Way, where site conditions allow and subject to an Ecological Impact Assessment." This link should be provided for pedestrians. However, a cycling link through the woods and across tree roots etc will create more environmental impact. The pedestrian route should not be lost just because a cycle route proves unsuitable after an ecological impact assessment. Please separate the proposals for these two types of route. Please do walk the area. While we want to keep the nesting birds safe, we also want people to walk along that part of the woods. There are lovely seats along the path, made from pallets and a lovely promontory where many people relax looking along the Welsh Harp towards the Wembley arch and at the Phoenix Canoe Club opposite. After reaching Priestley Way, it is a short walk to get back onto the path that runs along the north of the Welsh Harp and past the bird hides. This route needs to be shown and encouraged. 	Noted – the accessibility of this path was investigated and confirmed.	No proposed change.
50	Dollis Hill Residents' Association (DHRA)	7.2 The Broadway	<ul style="list-style-type: none"> We need safe pedestrian walkways to Brent Cross West station, so pressure is needed on Barnet Council to provide them instead of the current desire line across the Argos car park. Otherwise, it is hard for Staples Corner to claim there will be safe, quick pedestrian access to the station. It is not only the A5 pedestrian crossing you are suggesting opposite the station that is needed. People who live and work south of that will use the pedestrian crossing at the end of Humber Road and need a safe route across the current Argos / Decathlon car park. M.12.C and the Figure 24 must be amended to include pedestrian access for those who approach the A5 from Humber Road. Humber Road is a key part of the Staples Corner area so must have pedestrian access from it to the station enhanced. 	<p>Noted – LB Barnet have commenced work on a masterplan for the Brent Cross West Growth Area and a key part of this is how the new Brent Cross West station will be accessible from Edgware Road and beyond, including the provision of a new at-grade crossing.</p> <p>LB Brent have also commissioned a study to explore options for the provision of an at grade crossing across Edgware Road between Oxgate Lane and Humber Road.</p>	M.12.C and Figure 24 to be removed – see P.01.EWR and Figure 34 in emerging Masterplan & Design Code SPD.
51	Environment Agency	2.5 Green and Blue Infrastructure (Natural Features)	<ul style="list-style-type: none"> We are pleased to see the inclusion of the Brent Reservoir in paragraph 2.5.2 and the details related to biodiversity. We would recommend including text related to the reservoir's potential to provide opportunities for leisure and access to green/blue space for those living/working in Staples Corner. We would also recommend including details related to the Water Framework Directive (WFD) status of any statutory/non statutory designated sites. This information is available to public and can be accessed here. 	<p>Noted.</p> <p>The SSSI condition was last identified as 'favourable' by Natural England. Whilst there is no specific comment on the Brent Reservoir, the watercourse condition overall is moderate in terms of its ecology, but fails on chemical pollution.</p>	2.5 to be removed.
52	Environment Agency	2.5 Green and Blue Infrastructure (Natural Features)	<ul style="list-style-type: none"> We note that in paragraph 2.5.3, the document states that '<i>much of the river Brent has been culverted ..</i>'. However, we believe that is not the case and the culverts are only present beneath roads. We do note that upstream of the Edgware Road, the river has been artificially straightened and constrained within a concrete channel. This has removed the river's natural character and damaged its biodiversity and social value. 	Noted.	Para 2.5.3. to be removed – commentary on the River Brent will be covered under 'Green and Blue Infrastructure' in the merging Masterplan & Design Code SPD.
53	Environment Agency	2.5 Green and Blue Infrastructure (Flood Risk)	<ul style="list-style-type: none"> We welcome the inclusion of a map to show flood risk in the area. However, we recommend changing the key for flood zones on page 23 to better reflect flood zones as outlined in our flood map for planning, which can be accessed here. 	Noted.	Map 10 to be removed – commentary on flood risk will be covered under 'Green and Blue Infrastructure' in the merging Masterplan & Design Code SPD.
54	Environment Agency	2.5 Green and Blue Infrastructure (Flood Risk)	<ul style="list-style-type: none"> We also note that there are several surface water outfalls entering the Brent/Welsh Harp that take drainage from the Staples Corner area. These are polluted by misconnections, road runoff, and other effluent, causing damage to the river/reservoir on a regular basis. Some recognition of this and the role new 	Noted.	2.5 to be removed.

			development has in better managing the extent of pollution entering the Brent from this industry would be positive.		
55	Environment Agency	3.4 Vision Priority: Placeshaping	<ul style="list-style-type: none"> We are pleased to see the recognition of Brent Reservoir / Welsh Harp as biodiversity assets and would recommend including something related to reversing the artificial alterations made to the river Brent in the past. We also recommend mentioning the river Brent as a natural asset for flood risk and biodiversity purposes. We note that the following maintenance works are due in the near future: The Canal & River Trust is making a start on maintenance and improvement work needed at the Brent Reservoir (more commonly referred to as the Welsh Harp). This is due to start at the end of October, with the draining of the reservoir to allow for repair of the chains and rods that operate the sluice gates, as well as repainting the building which houses the water level controls. These statutory works are required under the Reservoir Act of 1975 – the same act that we have to abide by when carrying out the work over the autumn and winter is intended to reduce disturbance to nesting birds, such as the great crested grebe. There is also a fish rescue planned for mid-November 2023. Additionally, we would recommend focusing on the prevention of pollution that arises as a result of surface water lines that discharge into the Brent reservoir in this section. This would also include considerations related to the generation of litter and fly tipping which ends up in the river Brent. 	Noted.	3.4 to be removed.
56	Environment Agency	3.5 Vision Priority: Intensify Industrial	<ul style="list-style-type: none"> We recommend that consideration be made related to trade effluent management and proper drainage networks. We highlight the importance of ensuring that there are no cross-connections between surface and foul water lines. 	Noted.	3.5 to be removed.
57	Environment Agency	3.5 Vision Priority: Deliver Homes	<ul style="list-style-type: none"> If residential use is not within Flood Zone 1, please consider the increase in vulnerability for residential if located in parts of Flood Zone 2. Please note that a sequential test (and exceptions test, as appropriate) may need to be undertaken for development within Flood Zone 2 as required by National Planning Policy Framework (paragraph 162). 	Noted.	3.5 to be removed.
58	Environment Agency	4.3 Character Areas	<ul style="list-style-type: none"> We are pleased to see the provisions for green buffer zones for the benefit of biodiversity. We recommend including text around the restoration of river Brent to a more natural form and provision of blue spaces under the heading ‘a place as it might be’ on pages 47 and 49 of the document. We note that considerations should be given to the impacts of increased access to the Welsh Harp and the negative impacts of high-rise buildings on biodiversity. 	Noted.	4.3 to be removed – commentary on the restoration of the River Brent will be covered under the ‘Green and Blue Infrastructure Strategy’ in the emerging Masterplan & Design Code SPD.
59	Environment Agency	4.3 Character Areas	<ul style="list-style-type: none"> Furthermore, we note that all 6 areas sit in the drainage catchment which discharges into the river Brent and/or Brent Reservoir. There are regular pollution incidents from these outfalls, mainly coming from areas 5 & 6. Sealed drainage systems/connection into foul water lines on new industrial estates are paramount. Area 1 is a hotspot for litter and fly tipping. Any redevelopment should include preventative measures such as open spaces, lighting and appropriate CCTV usage. 	Noted.	4.3 to be removed – commentary on the drainage requirements for industrial areas will be covered under ‘Environmental Sustainability’ in the emerging Masterplan & Design Code SPD. See also N.03.
60	Environment Agency	5.1 Movement	<ul style="list-style-type: none"> While we are supportive of the movement design code M.01.A (increasing access to natural assets) from the point of view of 	Noted.	5.1 to be removed.

			<p>increasing engagement and community ownership of the natural environment, we note that increased access often risks degrading a natural asset. For example, increased footfall can disturb habitats and introduce pollutants that can wash into watercourses and thus deteriorate a water body. The Dollis Brook and Upper Brent and the Welsh Harp are WFD designated waterbodies, and thus their ecological status and their classifying elements must be protected from deterioration. We note that Brent Council has passed this obligation directly onto developments in the area via Policy BGI1 (paragraph g., page 518) in the Brent Council Local Plan.</p> <ul style="list-style-type: none"> We would therefore recommend a line being added to these Nature design codes that specifically states that detrimental impacts of increased access to natural assets 'must' be mitigated against. Examples of such mitigation might be the avoidance of any impermeable paving being added alongside the River Brent or Welsh Harp, or increased riverside planting to buffer against surface run-off. 		
61	Environment Agency	5.1 Movement	<ul style="list-style-type: none"> Additionally, we are pleased to see the inclusion of permeable paving in design code M.11.A, as it is an important SuDS intervention. However, we highly recommend that this should be upgraded from 'should' to 'must'. This is also supported by Policy BSUI4 of the Brent Local Plan. 	Noted.	M.11.A to be removed.
62	Environment Agency	5.1 Movement	<ul style="list-style-type: none"> From an air quality perspective, we would suggest the code(s) should reference the London Plan Air Quality Policy SI 1 and specifically the London Plan Guidance on Air Quality Neutral and Air quality Positive. Further, we recommend that the codes refer to the agent of change policy in regard to new development. 	Noted.	Commentary on air quality will be covered under 'Sustainability and Energy' in the emerging Masterplan & Design Code SPD.
63	Environment Agency	5.2 Nature	<ul style="list-style-type: none"> We are pleased to see the inclusion of code N.01.A to protect the existing green and blue assets in the area. Furthermore, we would like to note that any works within 8 metres of a main river would require an environmental permit in line with Environmental Permitting (England and Wales) Regulations 2016. 	Noted.	N.01.A to be retained as area-wide design code – see N.01.
64	Environment Agency	5.2 Nature	<ul style="list-style-type: none"> While we welcome code N.02.A, we recommend including something around the avoidance of loss of greenspace before mitigating for such loss. 	Noted.	N.02.A to be retained as area-wide design code – see N.02.
65	Environment Agency	5.2 Nature	<ul style="list-style-type: none"> We also suggest the inclusion of text around following the Local Plan's tree strategy in code N.03.A. 	Noted.	N.03.A to be removed.
66	Environment Agency	5.2 Nature	<ul style="list-style-type: none"> We welcome the promotion of SuDS in code N.05.A and would recommend the inclusion of text around SuDS being in line with Brent Surface Water Management Plan. We would also like to highlight that this could be used as a good opportunity to incorporate aspects like green roofs etc. 	Noted.	Commentary on SUDS will be covered under 'Environmental Sustainability' in the emerging Masterplan & Design Code SPD.
67	Environment Agency	5.2 Nature	<ul style="list-style-type: none"> We welcome code N.06.A and recommend that the code (or else where in the document) highlights some measures that can be adopted. Such measures are outlined in the Thames River Basin Management Plan (TRBMP). 	Noted.	Commentary on water management and biodiversity will be covered under 'Environmental Sustainability' in the emerging Masterplan & Design Code SPD.
68	Environment Agency	5.2 Nature	<ul style="list-style-type: none"> Furthermore, we suggest including 'native established' vegetation to code N.08.A to avoid any doubt in terms of any invasive non-native species. 	Noted.	N.08.A to be retained as area-wide design code – see N.01.
69	Environment Agency	5.2 Nature	<ul style="list-style-type: none"> The Brent Council local plan, policy BSUI4 (page 543) states that greenfield run-off rates should be achieved, and that failure to do so must be clearly justified. Given that design codes N.10.A to N.12.A are describing each of these different SuDS systems (trees pits, SuDS of slopes, etc) at their most efficient, we are of the opinion that all of these 'shoulds' should be upgraded to 'musts'. 	Noted.	N.10.A to be removed. N.12.A to be removed.

			This will ensure that Staples Corner SuDS systems stand the best chance of satisfying Brent Local Plan policy BSUI4, as well as ensuring that any installed SuDS systems remain an asset to Staples Corner for years to come.		
70	Environment Agency	5.2 Nature	<ul style="list-style-type: none"> We welcome code N.13.A around the restoration of river Brent but highly recommend changing the wording 'could' to 'must' to comply with the requirements of the Water Framework Directive, as outlined earlier on in this response. 	Noted.	N.13.A to be removed – commentary on the re-naturalisation of the River Brent will be covered under 'Green and Blue Infrastructure' in the emerging Masterplan & Design Code SPD.
71	Environment Agency	5.2 Nature	<p><u>Groundwater and land contamination</u></p> <ul style="list-style-type: none"> Lastly, we note that the document does not consider groundwater and land quality issues. For section 5.2 (Nature) there should be a design code added to the table that considers this. A suggested code could be: "Development proposals must protect and enhance groundwater and land quality". For reference – "groundwater" in this statement covers both groundwater quality and quantity. Developments should not negatively impact groundwater flow or quantity, nor should it negatively impact groundwater quality. It should be ensured that any preliminary risk assessment and subsequent site investigation and remediation strategies at sites with land affected by contamination should be undertaken by a competent person. The National Planning Policy Framework (NPPF) paragraph 183c) defines a competent person (to prepare site investigation): "A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation". Please also see the following generic advice with respect to contaminated land issues: <ul style="list-style-type: none"> Specific National Planning Policy Framework (NPPF) paragraphs 174 and 183 should be considered Relevant guidance such as the Environment Agency's Approach to Groundwater Protection and Land Contamination Risk Management (LCRM) should be promoted The Approach to Groundwater Protection should be considered with regard to development proposals that we would object to in principle. Policies should require developers to submit a Preliminary Risk Assessment (PRA) together with a planning application where land is potentially contaminated. Policies should require developers to ensure sites are suitable or made suitable for intended use. Policies should require developers to prevent discharges to ground through land affected by contamination. It is indicated that proposed sites will be industrial in nature. Certain industrial activities (such as an installation or waste activity) will require an Environmental Permit. Operators of any sites allocated for industrial use should use the Check if you need an environmental permit guidance for specific permitting requirements for their site, and if further guidance is required then contact the Environment Agency. With respect to industrial sites – use of SuDS may require an environmental permit. Please see position statement G11 of the Environment Agency's Approach to Groundwater Protection: 	Noted.	Commentary on groundwater and land contamination will be covered under 'Environmental Sustainability' in the emerging Masterplan & Design Code SPD.

			<ul style="list-style-type: none"> G11 – Discharges from areas subject to contamination <i>“Discharges of surface water run-off to ground at sites affected by land contamination, or from sites used for the storage of potential pollutants are likely to require an environmental permit. This applies especially to sites where storage, handling or use of hazardous substances occurs (for example, garage forecourts, coach and lorry parks/turning areas and metal recycling/vehicle dismantling facilities). These sites will need to be subject to risk assessment with acceptable effluent treatment provided.”</i> 		
72	Environment Agency	5.4 Identity	<ul style="list-style-type: none"> We welcome the inclusion of code I.02.A but would recommend naming the river Brent / Welsh Harp to give more weightage to this design code. Furthermore, while we recommend provision of new connections in code I.05.A, we note that new connections should be sensitive to wildlife refuge and SSSI sites. 	Noted.	I.02.A to be removed.
73	Environment Agency	5.5 Public Space	<ul style="list-style-type: none"> In order to comply with the Brent Local Plan, we feel that the word 'should' must be upgraded to a 'must' in code P.10.A. Brent Local Plan Policy BGI1 obligates all developments adjacent to the Blue Ribbon Network (such as Staples Corner) to enhance biodiversity, to avoid undermining existing biodiversity, and to avoid the deterioration of WFD designated waterbodies (of which invertebrates and macrophytes are biological quality elements for the Dollis Brook and Upper Brent). 	Noted.	P.10.A to be removed.
74	Environment Agency	5.6 Resources	<ul style="list-style-type: none"> There is an absence of building water efficiency measures. We would stress that energy is not the only resource that needs to be responsibly managed, and we urge the Staples Corner design code to add elements specifically addressing water resources. Efficient use of water also supports efficient use of energy resources by contributing towards lower greenhouse gas emissions. Attention to water resources would therefore strengthen R.01.A and place the design code in line with policy BSUI1 in the Brent Local Plan (page 534) and policy SI 2 in the London Plan (page 342). 	Noted.	R.01.A to be removed – commentary on water management will be covered under 'Environmental Sustainability' in the emerging Masterplan & Design Code SPD.
75	Environment Agency	5.6 Resources	<ul style="list-style-type: none"> We recommend that the design code should add a 'must' that any residential developments must demonstrate a water efficiency of at least 105 litres per head per day. This is in order to comply with Brent Local Plan policy BSUI4. 	Noted – matters relating to the water efficiency of new development is already captured as part of the planning process.	No proposed change.
76	Environment Agency	5.6 Resources	<ul style="list-style-type: none"> Moreover, in code R.07.A, we would be very supportive of this being upgraded to a 'must' given the prevalence of existing building stock in the Staples Corner area. The existing building stock are of a considerable size, meaning the usual barriers to retrofitting (e.g. space in existing building, pitch of domestic roof, etc) are significantly diminished. Given that existing building stock nationwide is more inefficient than new developments, we feel that retrofitting would one of Staples Corner's primary means of delivering more efficient resource use. We would also be very supportive of retrofitting being defined as a means of delivering improving energy and water use. A BREEAM technical guide on retrofitting is available here. 	Noted – this matter was explored during the development of this Design Code and 'should' was felt to strike an appropriate balance between encouraging reuse, adaptation and retrofitting and allowing sufficient flexibility. It is not considered possible for this Design Code to enforce that it 'must' be delivered.	R.07.A to be retained as area-wide design code – see R.02.
77	Environment Agency	5.6 Resources	<p><u>Water resources and efficiency</u></p> <ul style="list-style-type: none"> The London Plan Policy SI 5 (London Plan, paragraph C.2., page 356) states that all commercial developments 'should' achieve at least the BREEAM excellent standard for the WAT01 water efficiency category, and to 'incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates and to maximise future-proofing'. This requirement should 	Noted – matters relating to the water efficiency of new development is already captured as part of the planning process and within existing planning policy.	No proposed change.

			<p>therefore be added to the design code as at least a 'should' for commercial developments.</p> <ul style="list-style-type: none"> • However, we would be very supportive of the design code going further and making such requirements into a 'must'. This is considering the water stress situation that London faces. We have projected that an additional 1765 megalitres per day will be required in southeast England alone by 2050 in order to supply the growing population, make our supplies more resilient to drought, and to address the impact of climate change (https://www.thameswater.co.uk/about-us/regulation/water-resources). Consider this in the light of Thames Water estimates a shortfall of 387 megalitres per day by 2045 and it becomes clear that all developments in London must do their utmost to conserve water. • Brent Local Plan policy BSUI1 states that all major non-residential developments must achieve a BREEAM standard of 'Excellent' - we would therefore encourage this design code to specifically state that 'excellent' must be achieved in the WAT01 category. • A technical guide on BREEAM fit outs is available here: https://bregroup.com/products/breeam/breeam-technical-standards/breeam-refurbishment-and-fit-out/#RFO-Tech-manuals 		
78	Environment Agency	6.3 Oxgate Lane	<ul style="list-style-type: none"> • With regarding to code N.10.B, we would be supportive of this being upgraded to a 'must' (with perhaps the dispensation of 'where sites conditions allow') and we suggest the wording be altered to emphasise that such buffer zones would be SuDS buffers zones, delivering multiple beneficial outcomes. This will ensure that wherever SuDS mechanisms between cycle route and road are possible they will be obligated. Any and all opportunities to improve the water quality of surface water run-off must be maximised, otherwise WFD designated waterbodies/supporting elements may face deterioration. Such deterioration would be against Brent Local Plan policy BG11 (page 518). 	Noted – this design code is specific to the aspirational proposals for Oxgate Lane, potentially rendering the suggested dispensation obsolete. Notwithstanding, this and other similar design codes have been reviewed.	N.10.B to be retained – see N.03.OGL.
79	Environment Agency	7.1 Staples Cross, 7.2 The Broadway, 7.3 Oxgate Lane, 7.4 Oxgate Circus	<ul style="list-style-type: none"> • Please note that our comments to Section 5.2 above are also relevant in terms of nature related design codes for specific areas (sections 7.1 – 7.4), according to the specific environmental constraints. 	Noted – responses as above (see 63-71)	Proposed changes as above (see 63-71)
80	Epping Forest District Council	General	<p>What is your relationship to the Staples Corner area?</p> <ul style="list-style-type: none"> • None of the above <p>Are you generally supportive of the Staples Corner Design Code?</p> <ul style="list-style-type: none"> • Yes 	Noted.	No proposed change.
81	GLA	General	<ul style="list-style-type: none"> • The GLA supports the use of design codes to provide greater clarity and certainty over development 	Noted.	No proposed change.
82	GLA	General	<ul style="list-style-type: none"> • As the draft design code is being developed alongside the emerging masterplan for Staples Corner, it is unclear why the design code is being consulted on now as opposed to waiting until the masterplan is adopted. Consulting on the design code after the masterplan is adopted would allow the design code to go into more detail than is currently the case. 	As set out in paras 4.1.2 to 4.1.5, this Design Code was consulted on in advance of the masterplan as a 'moment in time' to help shape the masterplan's ongoing development and provide a relative degree of certainty to potential applicants.	No proposed change.
83	GLA	General	<ul style="list-style-type: none"> • In places, the draft design code reads more like policy guidance rather than a design code. In this regard, it would be useful to include more precise visuals which illustrate, and set out, the codes/parameters being set. These more precise design codes 	Noted – as this Design Code is developed and integrated into the emerging Masterplan & Design Code SPD, it will be streamlined, with much of its content superseded by the relevant spatial strategies of the masterplan. The next iteration of the Design Code will focus on	No proposed change.

			would add clarity over future development in the area. The current illustrations in the consulted draft add little certainty over future development.	streetscape and character, and where specific design codes and illustrations are to be retained or added, these will be made more quantitative, where possible, to give greater certainty.	
84	GLA	General	<ul style="list-style-type: none"> It is unclear if the guidance in the design code fully reflects the potential scale of the industrial buildings required if the area of SIL is decreased through the masterplan to enable the introduction of approx 2,200 homes and to cater for the setbacks proposed. 	At the time of publication of this Design Code for consultation, the masterplan was still in development and subject to viability and commercial analysis. As set out in para 4.1.2, the scope of this Design Code is, "limited to address matters that do not prejudice key decisions yet to be made, particularly around land use" and therefore likely quantum of development.	No proposed change.
85	GLA	General	<ul style="list-style-type: none"> The acknowledgement that the SIL needs to be serviced by HGVs is welcome. 	Noted.	No proposed change.
86	GLA	General	<ul style="list-style-type: none"> The document could be clearer on how it aims to safeguard the identified notable local assets/landmark buildings and integrate new development around these. Little detail is provided on this and in some cases, the illustrations in the Design Code (see Figure 14, 27 and 29 for instance) indicate that some of these buildings could be demolished/replaced with new development. 	<p>Noted – this matter was explored during the development of this Design Code and the relevant design codes were felt to strike an appropriate balance between encouraging the safeguarding of notable local assets and allowing sufficient flexibility. It is not considered possible for this Design Code to enforce that they 'must' be retained.</p> <p>However, the emerging Masterplan & Design Code SPD will provide further clarity on the buildings retained as part of the Masterplan, whilst ensuring the envisaged development quantum can be delivered.</p>	No proposed change.
87	GLA	General	<ul style="list-style-type: none"> The design code should include criteria / guidance to ensure the buildings in SIL are designed to cater for heavier industrial uses and those that require greater separation from residential uses in line with the role of SILs across London. 	Noted – at the time of publication of this Design Code for consultation, the masterplan was still in development and sites designated for industrial intensification had yet to be identified. Now the land use strategy has been agreed, these sites have been reviewed to understand where additional separation distance requirements may be required and, potentially, supported by design codes.	No proposed change.
88	GLA	General	<ul style="list-style-type: none"> The guidance should note that development around the SIL should be designed to protect amenity from the 24 hour / 7 day a week activities that need to operate in SIL. This should refer to the Agent of Change principles. 	Noted – response as above (see 87)	As above (see 87)
89	Historic England	General	<ul style="list-style-type: none"> We welcome production of this design code and encourage the document to articulate as clearly as possible the character of the area, interweaving key aspects of its heritage and supporting greater understanding and appreciation of its heritage assets. One way this might be done would be to include a little more detail in section 4, thereby helping users to implement design codes such as I.05.C: "The visual identity of Staples Cross should be distinctive and reflect the local character." Also, we encourage the design code to capitalise more clearly on relevant heritage assets within the Oxgate Circus area, especially Oxgate Farm (Grade II*). 	As this Design Code is developed and integrated into the emerging Masterplan & Design Code SPD, it will be streamlined, with much of its content superseded by the relevant spatial strategies of the masterplan. The next iteration of the Design Code will focus on streetscape and character, and where specific design codes are to be retained or added, these will include more detail, where possible, to give greater certainty.	I.05.C to be removed.
90	Historic England	2.4.1	<ul style="list-style-type: none"> We advise against referring to locally listed buildings as a type of listed building, as this can lead to some confusion. With that in mind, we suggest a minor change as follows: "Within Staples Corner, there is one listed building; the Grade II* listed Oxgate Farm located on Coles Green Road, which currently is on the Heritage at Risk Register; also there is a locally listed WW2 bunker, is located beneath 403-405 Edgware Road." 	Noted.	2.4.1 to be removed.
91	Historic England	2.4.2	<ul style="list-style-type: none"> To facilitate easier follow-up, we recommend making clear how these two sites are designated i.e. "There are also two sites designated by Brent Council as Sites of Archaeological Importance; one to the north-west and one bordering the Growth Area to the east." 	Noted.	2.4.2 to be removed.

			<ul style="list-style-type: none"> Also, for consistency, should the key be changed from "Site of Archaeological Interest" to "Site of Archaeological Importance"? 		
92	Historic England	Map 8	<ul style="list-style-type: none"> The map includes two different shades of orange. Is that intentional? 	No, Map 8 mistakenly includes legacy graphics denoting the Sites of Archaeological Importance.	Map 8 to be removed.
93	Historic England	2.6 Landscape and Townscape	<ul style="list-style-type: none"> The section on landscape and townscape focuses principally on topography and views/vistas. Could more be drawn from the content in the appendix that summarises the townscape of Staples Corner and conveys a greater sense of its character? 	Noted.	2.6 to be removed.
94	Historic England	2.6.3	<ul style="list-style-type: none"> To facilitate easier follow-up, we recommend making clear the origin of this protected view. We understand this originates from the Barnet Local Plan i.e. "There is one protected view across Staples Corner from Golders Hill in the east to Harrow-on-the-Hill in the west. Refer to the Barnet Local Plan for more information." We query how this protected view has been taken into account later in the design coding? Our comment below relating to page 56 also refers. 	<p>Noted – it has not been possible to geolocate the origin of the protected view to provide greater certainty.</p> <p>In terms of responding to the protected view, whilst in abeyance at the time of publication of this Design Code for consultation, it has influenced the approach to building heights in the masterplan, with further detail to be set out within the emerging Masterplan & Design Code SPD.</p>	2.6.3 to be removed – commentary on tall buildings, townscape and protected views will be covered under 'Intensification/Optimising Sites and Building Heights' in the emerging Masterplan & Design Code SPD.
95	Historic England	3.3 Vision Statement	<ul style="list-style-type: none"> We query if the heritage of the area might be woven into the vision statement, recognising placeshaping vision priority 11 e.g. "A functional and permeable place with improved environment for active travel, health, biodiversity, and ecology and heritage" 	Noted.	No proposed change.
96	Historic England	3.4 Vision Priority: Placeshaping	<ul style="list-style-type: none"> We broadly welcome the vision priorities on placeshaping, especially priority 11 to "Reveal and enhance the significance of all local heritage assets and consider this when defining the character of the area." 	Noted.	No proposed change.
97	Historic England	3.6 Vision Priority: Deliver Homes	<ul style="list-style-type: none"> We recommend referring to the source of the figure "2,200 homes" enabling this section to connect with the underlying drivers and evidence base. 	Noted – the projected capacity of 2,200 homes was rigorously tested through the drafting of the now adopted Brent Local Plan 2019-2041 (see Policy BEGA2A)	No proposed change.
98	Historic England	4.3 Character Areas	<ul style="list-style-type: none"> There is an opportunity to underscore the value of heritage in the Oxgate Circus to local identity. This would benefit from being articulate in the place "as it might be" e.g. a new point such as: "5. Enhanced understanding and appreciation of the local historic environment" 	Noted.	4.3 to be removed.
99	Historic England	5.3 Built Form	<ul style="list-style-type: none"> Might this area wide design code provide an opportunity for referring to the protected view which cuts across the code area, ensuring that development proposals should not harm that protected view? 	Noted.	5.3 to be removed - commentary on the relationship of building heights to protected views will be covered under 'Intensification/Optimising Sites and Building Heights' in the emerging Masterplan & Design Code SPD.
100	Historic England	5.4.1	<ul style="list-style-type: none"> We recommend a minor addition to the third bullet as follows: "Support natural and heritage assets becoming a key part of the area character" 	Noted.	5.4 to be removed.
101	Historic England	5.6 Resources	<ul style="list-style-type: none"> While we welcome the design code's support for retrofit, we recommend adding a line to make clear that a whole building approach is needed for traditionally constructed buildings, informed by heritage expertise. This point could be added both to paragraph 5.6.1 and to the design code itself e.g. within R.07.A: "Reuse, adaptation and retrofitting should be prioritised as a first approach to any and all development proposals. A whole building approach is needed for the retrofit of traditionally constructed buildings, informed by heritage expertise." 	Noted.	5.6.1 to be removed. R.07.A to be retained as area-wide design code – see R.02.
102	Historic England	Figure 8	<ul style="list-style-type: none"> We welcome identification of Oxgate Farm as a valuable resource, indeed an asset, offering the opportunity to enhance the contribution made by this asset to the character of the local area. Might the area's archaeological remains (linked with areas of archaeological importance) also be identified as a resource? 	Noted.	Figure 8 to be removed.
103	Historic England	Figure 28	<ul style="list-style-type: none"> We advise identifying Oxgate Farm on Figure 28, mention this asset under "Unlock value" on page 101, encouraging investment 	At the time of publication of this Design Code for consultation, Oxgate Farm was the subject of a refused planning application (Ref:	No proposed change.

			in this important asset – potentially the Borough’s oldest surviving house.	22/2478) – this application was subsequently approved at appeal (Appeal Ref: APP/ T5150/ W/ 23/ 3320652) on 9 th November 2023 and should safeguard the future of the existing building.	
104	Historic England	7.4 Oxgate Circus (Identity)	<ul style="list-style-type: none"> We recommend adding an additional code linked with the area’s history. Potential wording for consideration: <i>“Proposals should respond positively to the area’s history, enhancing and using its heritage assets, where possible, to strengthen local identity”</i>. 	Noted – the next iteration of the Design Code will focus on streetscape and character, and relevant ‘place-focussed’ design codes will be retained and made specific to individual streets.	7.4 to be removed.
105	Historic England	7.4 Oxgate Circus (Resources)	<ul style="list-style-type: none"> Given Oxgate Farm is mentioned as a resource in Figure 8, it seems a missed opportunity not to mention such an asset here. Proposed wording for consideration, which also picks up on the local area of archaeological importance: <i>“Development proposals should respond positively to local heritage assets, taking opportunities available to enhance their significance, setting and/or appreciation.”</i> 	Noted – the next iteration of the Design Code will focus on streetscape and character, and relevant ‘place-focussed’ design codes will be retained and made specific to individual streets.	7.4 to be removed.
106	Iceni Projects (on behalf of Wing Yip)	General	<p>We understand that the Draft Design Code is the first stage of the masterplanning process for the Staples Corner Growth Area, and that the next stage would be to prepare a more detailed Masterplan which would be consulted upon during 2024.</p> <p>Wing Yip supports the overall long-term vision for the Staples Corner Growth Area as envisaged by the Draft Design Code, which acknowledges its significant contribution as one of the key mixed use urban regeneration areas in London. Specifically, this would see the area accommodate up to 2,200 new homes, along with industrial intensification, improved public realm and infrastructure facilitated by the soon to be opened Brent Cross West Station.</p> <p>Notwithstanding this general support, Wing Yip has identified a number of key considerations, which they would like the Council to consider during the development of the Masterplan for the Staples Corner Growth Area. Wing Yip look forward to working proactively and collaboratively with the Council in progressing these aspects at the relevant time and with an appropriate level of information commensurate with the relevant stages of the Design Code and Masterplan as both progress and being cognisant that this current consultation is at the very early stages of the overall process.</p> <p>The key Wing Yip considerations principally relate to operational matters and requirements, pedestrian, vehicular and customer accessibility, phasing and transitional arrangements, including the potential impact of the Masterplan on short- and medium-term investment decisions for Wing Yip and their tenants. Wing Yip would also be keen to ensure that the Council has considered relevant key agent of change principles and the interface between commercial and emerging residential uses. These considerations shall hopefully be helpful to the Council in enabling the advancement of the Design Code and the associated draft Masterplan in parallel with Wing Yip’s key principles and future vision for the betterment and development of their land in the long-term and how this may correlate with the overall long-term vision and wider Masterplan for the area.</p> <p><u>Wing Yip Business and Heritage</u> Wing Yip is a family owned and operated Chinese supermarket chain founded by Woon Wing Yip OBE in the 1970s. The Wing Yip business in Staples Corner was the companies first site in London and opened in 1988.</p>	<p>Noted – officers have met and engaged with Wing Yip over the recent months and will continue as the Masterplan moves forward to statutory consultation. The heritage and significance of the strategic land holding is recognised.</p> <p>Whilst it is not felt necessary for the Agent of Change principle to be specifically referred to in the Design Code, officers can confirm that the ‘agent of change’ principle will apply. Development which introduces sensitive uses to an area (for example housing) will be responsible for mitigating the impact from existing uses.</p> <p>The Masterplan will represent a framework under which development could come forward. Delivery in Staples Corner is proposed towards the second half of the Brent Local Plan period, i.e. 2023 onwards, so it is seen as a longer term project, notwithstanding that some early delivery would be welcomed. The council does not foresee any challenges preventing Wing Yip or their business tenants investing in short term betterment projects in the interim.</p> <p>LB Brent, by developing the Masterplan via the SPD process, and the principles within it, will provide clarity to developers and landowners about what is permissible on their sites and will guide the consideration of planning applications within the growth area. It is expected that Wing Yip will find this helpful in coming to decisions regarding the future use of their site.</p>	No proposed change.

			<p>The Wing Yip business and family benefit from close and long-standing connections in Staples Corner and within the local community, commensurate with their well established and loyal customer base, philanthropic work and wider business activities. The history and heritage of Wing Yip is important, adds substantially to local distinctiveness and sense of place and manifests both architecturally (China House), and culturally within the locality, the business supporting a substantial and increasing local Chinese community.</p> <p>The Wing Yip landholdings within the Staples Corner Growth Area extend to an area of approximately 2.8 hectares and has frontages to the A5 to the east, Oxgate Lane to the north, and Humber Road to the south. The Wing Yip landholding includes a range of flexible commercial / light industrial uses, including their cash and carry retail / warehouse operations and restaurant, and adjoining China House, along with the Splend Car Hire fronting the A5. The landholdings include Sayer Centre, Sayer House, and Wingate House which front Oxgate Lane and comprise mixed use commercial and / light industrial floorspace. All of the buildings are tenanted and accommodate successful, on-going and well established businesses.</p> <p><u>Operational Matters and Material Planning Considerations</u> Wing Yip are keen to ensure that the overall long-term vision for the Design Code and Masterplan does not prejudice or prevent short and medium term investment decision for both the Wing Yip operational businesses and their tenants. The potential risk is that the emerging Masterplan may deter business investment and expansion owing to the uncertainty associated not only with the Masterplan process but also its programme for overall delivery with the potential triple risk of investment being deterred, tenants moving out and the phased construction of the Masterplan restricting customer access and cumulatively detrimentally effecting short and medium term business viability, which would be in no one's interest. As such, any reassurance or clarity the Council can provide in relation to the overall programme for the formulation and adoption of the Design Code and Masterplan, would be helpful as would the Council's reassurance that the long term planning of the area would not prevent Wing Yip or their business tenants investing in short term betterment projects in the interim and potentially in parallel with wider and longer term work on the Masterplan.</p> <p>There are several operational concerns that Wing Yip would request that the Council consider during the development of the emerging Masterplan. These concerns are within the context of the existing mix of uses which currently operating from their landholdings, many of which are likely to be significantly impacted by the proposed transformation and mixed-use regeneration. These concerns are set out below.</p>		
107	Iceni Projects (on behalf of Wing Yip)	General	<p>Transport / Access / Construction Management</p> <ul style="list-style-type: none"> The primary vehicular entrance point to the Wing Yip store is via Humber Road and Oxgate Lane. Both of these entrance points accommodate HGV trucks to service the Wing Yip Store and light industrial uses across their Landholdings. The Humber Road entrance provides primary vehicular access to the customer and staff car parking across the site. These entrance points, service 	<p>Noted – in accordance with the Mayor's Transport Strategy, the aim of this Design Code and the emerging Masterplan & Design Code SPD is to support modal shift, by increasing levels of walking, cycling and public transport use across Staples Corner and the surrounding area.</p> <p>To facilitate this modal shift, the appropriate infrastructure must be delivered, and this Design Code sets out aspirations for what form</p>	No proposed change.

			<p>existing tenanted and popular businesses which have operated successfully from the site for a long time.</p> <ul style="list-style-type: none"> • It is noted that the Draft Design Code envisages the increased pedestrianisation and improved cycling infrastructure to support the transition of the Staples Corner Growth Area to a residential led mixed-use precinct. The Draft Design Code place strategy for 'the Broadway' also envisages the creation of a new public space to be located adjacent to China House, within the existing vehicular access road linking Oxgate Lane and Humber Road. • Wing Yip are concerned that the delivery of this infrastructure along with cumulative impacts of increased construction traffic during the delivery phase of the growth area would conflict with the operations of their business and mix of uses across their landholding, particularly along Oxgate Lane and Humber Road. • It is recommended that the Council consider the ongoing operations and vehicular access / delivery and servicing arrangements of the Wing Yip landholdings as part of the emerging Masterplan. The delivery of improved public realm and cycling infrastructure should not prejudice the ongoing operations of Wing Yip's landholdings. 	<p>this could take across a number of key streets within Staples Corner, including Oxgate Lane. These aspirations have been tested with LB Brent officers and are informed by more detailed work undertaken by transport planners and engineers at Alan Baxter Associates. This work has also informed the relevant spatial strategies that will be covered in the emerging Masterplan & Design Code SPD, though it is worth highlighting that a comprehensive approach to how servicing of industrial and commercial uses could be managed has been developed.</p> <p>Notwithstanding, concerns that significant alterations to the road network and public realm could lead to operational challenges for businesses like Wing Yip are understood, and will continue to be consulted on as part of the ongoing masterplan engagement process.</p>	
108	Iceni Projects (on behalf of Wing Yip)	General	<p>Agent of Change / Transitional Provisions / Phasing</p> <ul style="list-style-type: none"> • It is noted that the Staples Corner Growth Area currently accommodates 208,500sqm of industrial uses, and therefore the delivery of the Masterplan shall see the significant transformation of industrial led precinct, into a mixed-use regeneration area delivering up to 2,200 new homes. • It is acknowledged that the Council envisage the delivery of this regeneration in the longer term over the next 20+ years. It is also acknowledged that the Council have not yet considered delivery or phasing of the regeneration, having noted that this is likely to form the next phase of the emerging Masterplan. • Wing Yip acknowledge that their landholding is strategically well placed, being directly adjacent to the A5 and the new pedestrian connection envisaged to the soon to be opened Brent Cross West Station. This would suggest that their landholding is important for the success of the Masterplan and is likely to part of the first stages of delivery acting as a catalyst for place making around a new and improved public realm, active frontage and retail vitality and viability commensurate with a successful and well established business. Wing Yip, therefore, welcomes the opportunity to continuing to engage with the Council, to ensure that visions are aligned for their landholdings. Further detail on this vision is set out within Section c of this letter. • In addition, Wing Yip are concerned that there ongoing industrial / commercial operations may conflict with the influx of a new residential population within the area. There are likely to be amenity impacts experienced by these new residents associated with these industrial operations, which are not present now. There are co-locational / agent of change challenges to delivering new residential accommodation adjacent to existing operational industrial facilities, which Wing Yip requests that the Council consider when developing their emerging Masterplan for the growth area. 	<p>Noted – refer to Policy D13 of the London Plan. Again, whilst it is not felt necessary for the Agent of Change principle to be specifically referred to in the Design Code, officers can confirm that the 'agent of change' principle will apply. Development which introduces sensitive uses to an area (for example housing) will be responsible for mitigating the impact from existing uses.</p>	No proposed change.
109	Iceni Projects (on behalf of Wing Yip)	General	<p><u>Vision</u></p> <p>Wing Yip are supportive of the overall long-term vision for the Staples Corner Growth Area and see their landholdings as being strategically well placed to help deliver upon the Council's vision for the area.</p>	<p>Noted – the vision set out and opportunities identified are welcomed and align with officers' ambitions for the Wing Yip and other similar sites.</p>	No proposed change.

			<p>Wing Yip welcomes the opportunity to contribute to the Council’s ongoing masterplanning work to discuss their vision for their landholdings. The broad principles for this vision include:</p> <ul style="list-style-type: none"> • The ongoing successful operation of Wing Yip’s landholdings and businesses in the short and medium term and to ensure investment decisions can proceed undeterred. • The contribution the Wing Yip landholdings can make towards placemaking, specifically as a key attractor and potential gateway location into the Staples Corner Masterplan area from the Edgware Road and new Brent Cross railway station. • The opportunities for Wing Yip existing, viable and well-regarded business to contribute substantially to ground floor activation, attractiveness, commercial vitality and viability, pedestrian interest, security and placemaking. • The potential for Wing Yip’s heritage, culture, distinctiveness longstanding connection within the local community to be reflected both architectural and in land use terms within the Design Code and Masterplan in seeking to create local identity, to foster mix use, diversity and to assist in the creation of a strong emerging sense of place. • The potential for higher-density mixed-use redevelopment to include hotel and residential uses at upper levels with active commercial uses and frontages at basement and ground floor levels, which could include smaller scale retail / stores. • The appropriate phasing and delivery of new development across the Wing Yip land to optimise visibility, visual interest, attractiveness and wayfinding. • The potential for the delivery of new storage, cold storage and appropriate last mile distribution space to support the anticipated needs of the Wing Yip business, while simultaneously seeking to future proof the Masterplan in order to meet the servicing and delivery needs of a substantially increased local residential population and to support the ongoing growth of the regeneration area more generally. 		
110	National Highways	General	<ul style="list-style-type: none"> • We will therefore be concerned with proposals and policies that have the potential to impact the safe and efficient operation of the SRN, in the case of this consultation, particularly the M1. • We have reviewed the information available online and have no comment to make on the design or appearance of the area however we will appreciate being kept informed in the future. 	Noted.	No proposed change.
111	Natural England	General	<ul style="list-style-type: none"> • Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment. 	Noted.	No proposed change.
112	Sport England	General	<ul style="list-style-type: none"> • Sport England, in conjunction with Active Travel England and Office for Health and Improvement & Disparities, has produced the updated ‘Active Design’ (2023), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government’s desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the 	<p>Noted – as this Design Code is developed and integrated into the emerging Masterplan & Design Code SPD, it will be streamlined, with much of its content superseded by the relevant spatial strategies of the masterplan. To ensure it is succinct and meets DLUHC expectations that design codes are practical, legible and enforceable, it is not intended for this Design Code to replicate other guidance already in the public domain.</p> <p>However, this Design Code’s alignment to Sport England and OHID’s ‘Active Design’ principles will be reviewed to explore if there are</p>	

			<p>guidance in the master planning process for new residential developments.</p> <ul style="list-style-type: none"> The document can be downloaded via the following link: https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design We recommend that these principles are included within your design code for Staples Corner. It is noted that a number of these are already included within the guide, including; 'creating a walkable community', 'providing connected active travel routes' and 'mixing uses and co-locating trips' (all conducive to supporting Active Travel – see Active Design principles 2-4). 	<p>additional aspects that could be incorporated and, where this is not possible, these will be signposted.</p>	
113	Sport England	General	<ul style="list-style-type: none"> With the proposed addition of at least 2,200 homes in this location, it is important that the guide also considers what leisure, sport and recreation opportunities are available to the new residents. Sport England supports the intention to connect new residents with the reservoir and existing recreation ground. This will be essential to provide access for new residents. However, the design code should also highlight any opportunities for new leisure provision within the design code area. What additional social infrastructure can be provided to meet the needs of new and existing residents? For example, Principle 8 of Active Design is 'Providing activity infrastructure'. The Design Code could include more information about the infrastructure needed within the places to support physical activity. With such a high number of homes proposed could the council also consider how the code could help accommodate new spaces for play and informal recreation, are there opportunities to include a sports court, outdoor gym, parkour or skate park to support activity? Also, could the public realm include running tracks and prompts to undertake activity? Is a new school planned, would this be able to include sports space (indoors and outdoors) that could also be used by the community out of hours? 	<p>Noted – commentary on the provision of new open spaces and other social (leisure) infrastructure will be covered in the relevant spatial strategies in the emerging Masterplan & Design Code SPD.</p> <p>Notwithstanding, it is not intended for this Design Code, nor the Masterplan & Design Code SPD, to set out specific proposals as these will be assessed on a case-by-case basis and determined by an assessment of need.</p>	No proposed change.
114	Sport England	General	<ul style="list-style-type: none"> The recently updated Active Design guide also includes a new section 'applying the principles' (pg 58+). This includes suggestions for how Active Design principles can be delivered on the ground. I recommend reviewing these and considering whether more of these could be included within the area-wide section of the design code. It could be helpful to add a section specifically looking at identifying opportunities to support leisure and physical activity, as you have done for 'movement', 'nature' etc, identifying where new opportunities for leisure and physical activity could be supported within the local area. 	<p>As this Design Code is developed and integrated into the emerging Masterplan & Design Code SPD, it will be streamlined, with much of its content, such as the area-focussed design codes, superseded by the relevant spatial strategies of the masterplan. However, some strategically important area-focussed design codes will be retained.</p>	No proposed change.
115	Sport England	General	<ul style="list-style-type: none"> It is noted that the guidance references Brent's Residential Amenity Space & Place Quality SPD, this guidance helps to highlight the importance of delivering high-quality streets and spaces (Active Design Principle 5). More detail could be added to in the code with more information about the types of materials and design of key spaces (see Active Design page 37). 	<p>The next iteration of the Design Code will focus on streetscape and character, and where specific design codes relating to materiality etc. can be added, these have been.</p>	No proposed change.
116	Sport England	General	<ul style="list-style-type: none"> Finally, the Active Design guidance includes a checklist that can be applied to developments and it is recommended that the checklist is used in the preparation of an outline planning application for the individual phases to ensure that opportunities for encouraging active lifestyles have been fully explored as the proposals progress. This checklist can also be used as part of the preparation of a Health Impact Assessment. Sport England would 	<p>Noted.</p>	No proposed change.

			welcome the opportunity to discuss with any applicants in due course to provide further advice on how Active Design can be considered in the emerging proposals. Sport England is a consultee on residential developments of 300 dwellings or more.		
117	Start Easy Ltd		<p>What is your relationship to the Staples Corner area?</p> <ul style="list-style-type: none"> I work there <p>Are you generally supportive of the Staples Corner Design Code?</p> <ul style="list-style-type: none"> Yes <p>Please explain what, if anything, you like about the Design Code:</p> <ul style="list-style-type: none"> The attention to green and blue areas as the area might benefit with an increase of green cover 	Noted.	No proposed change.
118	Transport for London	General	<ul style="list-style-type: none"> Production of a design code is welcomed and many of the broad principles are supported. However, a more flexible approach is preferred with greater recognition that the code is indicative and aspirational rather than a rigid template. Some of the specific measures may not be practical or desirable to implement in all parts of an area or street and a more nuanced approach to implementation may be required. Understood that the design code is intended to provide advice to site developers, but some 'must' or 'should' requirements are likely to lie outside the direct control of developers and it is not clear how these requirements could be met through the planning process. Important that measures in the design code have the support of stakeholders. Examples include aspirations affecting the movement network such as alterations to carriageways and buffer zones which are subject to approval of highways and traffic authorities. Encourage using transport study work to build a firm evidence base for proposals which affect movement and the public realm. Important that specific measures are agreed with transport authorities before they are incorporated in the masterplan and design code. 	<p>Noted – to ensure it meets DLUHC expectations that design codes are practical, legible and enforceable, this Design Code will need to balance allowing flexibility against giving certainty to developers and other stakeholders, including the council itself. Where possible, this Design Code sets out specific and quantitative requirements to give that certainty.</p> <p>In accordance with the Mayor's Transport Strategy, the aim of this Design Code and the emerging Masterplan & Design Code SPD is to support modal shift, by increasing levels of walking, cycling and public transport use, and decreasing vehicle dependency across Staples Corner and the surrounding area.</p> <p>To facilitate this modal shift, the appropriate infrastructure must be delivered, and this Design Code sets out aspirations for what form this could take across a number of key streets within Staples Corner, given the council's greatest scope of influence, in terms of landownership, is over the public realm. These aspirations have been tested with LB Brent officers and are informed by more detailed work undertaken by transport planners and engineers at Alan Baxter Associates. This work has also informed the relevant spatial strategies that will be covered in the emerging Masterplan & Design Code SPD, though it is worth highlighting that none of the aspirations represent final proposals.</p> <p>A coordination meeting between TfL and LB Brent to discuss these representations and officers' responses took place on 24th January 2024. Further clarity on the ambitions of the Design Code was provided by LB Brent officers and the street section drawings were agreed in principle.</p>	To ensure any streetscape improvements comply with the relevant standards, it was agreed that the emerging Masterplan and Design Code SPD would signpost relevant TfL and other guidance.
119	Transport for London	General	<ul style="list-style-type: none"> Welcome reference to the Healthy Streets approach. All proposals should adopt the Healthy Streets approach, consider Vision Zero and follow best practice on women's safety. The design of proposed active travel routes, particularly at bridges, underpasses or through areas that lack natural surveillance should ensure that all users feel safe when using these routes including at night-time. 	Noted.	No proposed change.
120	Transport for London	General	<ul style="list-style-type: none"> Proposals affecting the operation or management of the A406 - North Circular Road which forms part of the Transport for London Road Network (TLRN) as well as any proposals affecting traffic signals or bus infrastructure will be subject to TfL approval. Proposals affecting the A5 – Edgware Road which forms part of the Strategic Road Network (SRN) will need to follow TfL guidance and advice. 	A coordination meeting between TfL and LB Brent to discuss these representations and officers' responses took place on 24 th January 2024. Further clarity on the ambitions of the Design Code was provided by LB Brent officers and the street section drawings were agreed in principle.	To ensure any streetscape improvements comply with the relevant standards, it was agreed that the emerging Masterplan and Design Code SPD would signpost relevant TfL and other guidance.

121	Transport for London	General	<ul style="list-style-type: none"> The Brent Cross Cricklewood regeneration scheme is being implemented over the next 10 to 15 years. There are proposed works at the M1/A406/A5 junction as well as the junction of the A5/Geron Way that are committed mitigation measures, so any measures proposed in this area will need to be compatible with these works. 	Noted – none of the street-focussed design codes and associated aspirational illustrations represent final proposals.	No proposed change.
122	Transport for London	General	<ul style="list-style-type: none"> Highlight the use of London Cycling Design Standards (LCDS) and TfL's Cycling Quality Criteria to ensure new cycle route proposals both meet the required quality for cycle routes in London, and are also compliant with the national LTN 1/20 guidance. There are proposals for a two-way cycle route at a minimum width of 3 metres (1.5 metres each direction) along Oxgate Lane, Coles Green Road (north and south) and Brook Road, however LCDS has a minimum recommendation of 2 metres for a cycle lane. 	<p>Noted – the LCDS recommendations have informed the indicative widths of all cycle routes shown in this Design Code. In terms of Oxgate Lane, Coles Green Road and Brook Road, it was considered that, as per figure 4.12 of the LCDS, the estimated flow category would be 'medium' and therefore that, as per figure 4.11 of the LCDS, a two-way cycle route at minimum width of 3 metres would likely be sufficient.</p> <p>For Oxgate Lane, this could be extended to 3.5 metres by omitting the adjacent SUDS buffer and reducing this to 0.5 metres in line with the LCDS recommendations. This could be further extended to 4 metres by omitting the SUDS buffer to the other side of and realigning the carriageway.</p> <p>For Coles Green Road (North), this could be extended to 4 metres by omitting the adjacent trees and SUDS buffer and reducing this to 0.5 metres in line with the LCDS recommendations. Tree planting (and SUDS) would then need to be delivered within the curtilage of individual sites as and when they came forward for redevelopment.</p> <p>For Coles Green Road (South), this could be extended to 4 metres by reducing the adjacent trees and SUDS buffer to 1 metre and omitting the potential for tree planting, unless delivered within the curtilage of individual sites as and when they came forward for redevelopment.</p> <p>For Brook Road, this could be extended to 4 metres by reducing the adjacent trees, SUDS and incidental play buffer to 1.5 metres.</p> <p>A coordination meeting between TfL and LB Brent to discuss these representations and officers' responses took place on 24th January 2024. Further clarity on the ambitions of the Design Code was provided by LB Brent officers and the street section drawings were agreed in principle.</p>	No proposed change.
123	Transport for London	3.5 Vision Priority – Intensify Industrial	<p><i>Improve connections to the A406 North Circular Road and strategic road network (A5, M1, A41) through provision of new service road loops that better support industrial uses.</i></p> <p>Any direct new connections to or access onto the A406 or A5 or changes to service roads directly fronting them will need to be approved by TfL and may need to be subject to a full road safety audit and modelling work. Any specific proposals should be considered in detail as part of the transport study.</p>	Noted – commentary on servicing and access will be covered under the 'Growth Area Servicing Strategy' in the emerging Masterplan & Design Code SPD.	3.5 to be removed.
124	Transport for London	3.6 Vision Priority: Deliver Homes	TfL supports objectives related to co-location and reducing vehicle traffic dominance. However, agent of change principles will need to be applied particularly where industrial uses are adjacent to residential uses because servicing and deliveries may need to operate on a 24 hour/ 7-day week basis.	Noted – commentary on co-location and agent of change principles will be covered in the emerging Masterplan & Design Code SPD.	3.6 to be removed.
125	Transport for London	5.1 Movement	<ul style="list-style-type: none"> We welcome the priority given to the provision of active travel and public transport infrastructure and the application of Healthy Streets Principles. Reference should also be made to a Vision 	Noted.	5.1 to be removed and replaced with an area-wide design code in the emerging Masterplan & Design Code SPD – see M.02.

			Zero approach to road safety. We would welcome encouragement of car free developments in well-connected locations and restricting parking to the minimum necessary elsewhere in line with the London Plan.		
126	Transport for London	5.1 Movement	<ul style="list-style-type: none"> TfL is aware of current concerns with personal safety around the area. TfL is part of the Mayor's Women's Night Safety Charter steering group https://www.london.gov.uk/programmes-strategies/arts-and-culture/24-hour-london/womens-night-safety-charter?ac-50877=50876 You can find further information here: https://www.london.gov.uk/sites/default/files/wnsc_toolkit_final.pdf The Mayor of London's Safety in Public Space: Women, Girls and Gender Diverse People with more Good Growth design advice here: https://www.london.gov.uk/programmes-strategies/shaping-local-places/advice-and-guidance/about-good-growth-design. TfL recommends considering these aspects as part of the movement strategy for the area. 	Noted – commentary on personal safety will be covered in the relevant spatial strategy in the emerging Masterplan & Design Code SPD.	5.1 to be removed and replaced with an area-wide design code in the emerging Masterplan & Design Code SPD – see P.01.
127	Transport for London	5.1 Movement	<ul style="list-style-type: none"> It is important that bus reliability, priority and access is considered including during construction phases. We note that M.06.A specifies that two-way servicing and emergency access routes must have a minimum carriageway width of 7.3 metres. Optimum road widths should be set on a street by street basis, taking account of street function rather than a single area wide approach. They should take into account whether the route is also designed to accommodate buses and cycle lanes as indicated on some of the plans. A Vision Zero approach should be taken to safer streets. As a principle, the preferred minimum lane width for a bus is 3.2m on a straight alignment. However, road widths between 3.2m and 4m should be avoided as this creates indecision areas and this width may be perceived as sufficient by bus drivers or cyclists to overtake. This can introduce road safety risks of conflict, leading to road traffic collisions. Areas where this is specifically mentioned in the document include M.03.B, M.06.B, M.08.B. 	Noted – the indicative widths of all carriageways shown in this Design Code have been informed by both the relevant standards and more detailed work undertaken by transport planners and engineers at Alan Baxter Associates. This work has also informed the relevant spatial strategies that will be covered in the emerging Masterplan & Design Code SPD.	M.03.B, M.06.B and M.08.B to be removed and replaced – see M.05.NCR, M.05.EWR, M.06.OGL, M.06.CGR, M.06.HBR, M.08.WLR and M.11.AWB.
128	Transport for London	5.1 Movement	<ul style="list-style-type: none"> Allowance also needs to be made to provide sufficient waiting areas for passengers around bus stops including shelters where locations permit. The whole length of the bus cage should be clear of street furniture to allow for flexibility in where buses stop and for 3-door vehicles. Bus cage lengths should be sufficient to cater for the number of buses per hour and for buses to overtake each other to prevent bus-on-bus delays. Entry/exit tapers are also required (see TfL's Accessible Bus Stop Design Guidance 2017 on bus stop layouts). Tracking for a 12 m electric bus should be carried out. TfL has made available a file for use in tracking software for any routes subject to bus routes, either present or future. 	Noted.	No proposed change.
129	Transport for London	5.1 Movement	<ul style="list-style-type: none"> We note the reference to corner radii in M.07.A. This could link to national guidance (i.e. Manual for Streets) rather than be left open to interpretation, as it is at present. What is 'appropriate' will depend on contextual safety considerations and pedestrian comfort, and the default should not be radii that account for the turning circle of large vehicles without them crossing the centre line. 	Noted.	M.07.A to removed.
130	Transport for London	5.1 Movement	<ul style="list-style-type: none"> We note that M.08.A states that a minimum footway clear width of 2 metres must be provided, with no less than 1.5 metres clear width provided where this is not possible. Although we 	Noted – the next iteration of the Design Code will focus on streetscape and character, and specific design codes can be added to address this matter on streets that are bus routes or are expected to	M.08.A to be removed and replaced – see M.04.NCR, M.03.EWR, M.03.OGL, M.03.CGR and M.03.HBR.

			understand the need to provide some flexibility we would not want the 1.5 metres clear width to become the default option which could be the case with the current wording. There may also be locations where footfall or the need to accommodate waiting areas around bus stops will require more than 2 metres.	be high footfall areas. Suggested wording, “ <i>The footway width along [insert street name] should be extended to 2.5 metres around bus stops, to meet relevant standards, and up to 3 metres (or more) where site conditions allow.</i> ”	
131	Transport for London	5.1 Movement	<ul style="list-style-type: none"> We note that M.09.A states that a comprehensive and area-wide approach should be taken to servicing and vehicle movements. This should include encouraging on site and off street servicing wherever possible. On street servicing and delivery bays should be avoided because of the impact on the public realm. There are a number of places in the area where reference is made to on street loading bays. We would want to ensure that this is options is only considered where on site servicing cannot be achieved. 	Noted – commentary on servicing and access will be covered under the ‘Growth Area Servicing Strategy’ in the emerging Masterplan & Design Code SPD.	M.09.A to be removed.
132	Transport for London	5.1 Movement	<ul style="list-style-type: none"> The movement strategy should also provide more positive encouragement to sustainable freight and logistics including provision for cargo bikes, consolidation hubs and shared facilities where this can reduce the need for vehicle movements. 	Noted – commentary on sustainable freight and logistics is covered by Policy BT3 Freight and Servicing Provision and Protection of Freight Facilities in the Brent Local Plan.	No proposed change.
133	Transport for London	5.2 Nature	<ul style="list-style-type: none"> Although we support and seek to extend urban greening and improvement of the TfL green estate it may not be possible for all new and existing streets to be tree-lined as required in N.04.A. Tree planting may need to be selective and not all locations will be suitable for tree planting, taking account of the surrounding context and long-term sustainability. For the TfL approach to green infrastructure on TfL highway please refer to the TfL Streets toolkit, particularly Streetscape Guidance and Sustainable Urban Drainage (SuDS). The guiding principle should be that the development meets London Plan policy guidance on urban greening within the site, and where greening on TfL highway is proposed, this should not conflict with TfL aims on road safety and access. The approach should be similar for the A5 and local roads. 	Noted.	5.2 to be removed and replaced with updated area-wide design codes in the emerging Masterplan & Design Code SPD – see N.01, N.02, N.03 and N.04.
134	Transport for London	5.2 Nature	<ul style="list-style-type: none"> It may be useful to consider requiring a commitment to future maintenance of SuDS infrastructure such as rain gardens, and for them to be designed with efficient and effective maintenance in mind. 	Noted – it is assumed this would only be applicable where SUDS is provided within development sites. Maintenance of SUDS within the public highway is assumed to be either the responsibility of LB Brent or TfL.	An area-wide design code will be added to require the ongoing maintenance of SUDS within individual sites to mitigate against surface water run off into the public highway.
135	Transport for London	5.2 Nature	<ul style="list-style-type: none"> We note that N.10.C, N.18.C, N.29.C and N38.C refer to green roofs on bus shelters. Five new green bus shelter roofs were installed as part of a trial in 2020. Bespoke shelters were developed and a selection of herbaceous perennials and spring flowering bulbs were planted. We’re still monitoring the results of the trial but are not currently planning to expand it. This is down to the high costs of building a bus shelter structure that can support the additional load for limited biodiversity benefits. Instead we are focusing on managing road verges for wildlife. 	Noted.	N.10.C, N.18.C, N.29.C and N.38.C to be removed.
136	Transport for London	5.3 Built Form	<p><i>Building lines must be set back from the North Circular Road and Edgware Road to allow for street trees and green buffers</i></p> <ul style="list-style-type: none"> As stated above, although we support urban greening it may not always be possible to introduce additional street trees or green buffers alongside the North Circular Road or Edgware Road due to local constraints. A more selective approach, informed by surveys may need to be adopted. Approval will be required from TfL to any changes to the North Circular Road that fall within the highway boundary. 	<p>For the avoidance of doubt, no changes are proposed to the North Circular Road within the highway boundary beyond the suggestion of planting to the central reservation (see 143).</p> <p>B.02.A sets out a strategic, area-wide ambition to improve air quality through enhanced greenery along the North Circular Road and Edgware Road. N.01.B and N.05.B suitably caveat that trees must only be planted “<i>where site conditions [...] allow</i>” implying the need for relevant surveys to be undertaken.</p>	B.02.A to be removed – N.01.B and N.05.B to be retained.

137	Transport for London	5.3 Built Form	<p><i>Podium car parking must not directly address the street other than for access.</i></p> <p>It is not clear why this refers only to podium car parking. Any car parking on the street frontage should be avoided and car parking as a whole should be minimised.</p>	Noted.	B.06.A to be removed.
138	Transport for London	5.5 Public Space	<ul style="list-style-type: none"> P.01.A currently reads as 'The public realm must feel safe, accessible and inclusive for all.' Noting that there is the possibility that some of the industrial floorspace will have 24/7 hour operations, a reference to 'at all times' should be included to ensure that the environment is attractive and safe to use for all during both night and day. 	Noted.	P.01.A to be removed and replaced with an area-wide design code in the emerging Masterplan & Design Code SPD – see P.01.
139	Transport for London	5.5 Public Space	<ul style="list-style-type: none"> P.03.A There needs to be a clear definition of what is meant by 'an uninterrupted public realm' – there will be vehicular accesses across the footways on these streets so it may be necessary to be more specific about how these should be treated 	Noted.	P.03.A to be removed and replaced – see P.01.OGL, P.01.HBR, P.01.WLR and P.02.NSS.
140	Transport for London	5.5 Public Space	<ul style="list-style-type: none"> P.06.A (and P.01.A) It would be useful for more detail to be provided on what constitutes an inclusive street environment in an industrial or mixed area taking account of the need of all users. This should address issues such as women's safety, the night-time environment, whether shared surfaces or shared use footways would be appropriate in any situations and the need for level differences or clear demarcation between pedestrian and vehicular space. 	Noted.	P.06.A to be removed and replaced with an area-wide design code in the emerging Masterplan & Design Code SPD – see P.01.
141	Transport for London	5.6 Resources	<ul style="list-style-type: none"> R.12.A which states that development proposals could exceed net zero carbon targets may need to be rephrased to ensure that it isn't misinterpreted. It should be linked to R.01.A which states that development proposals must meet net zero carbon targets. 	Noted – commentary on sustainability and achieving net zero will be under 'Sustainability and Energy' in the emerging Masterplan & Design Code SPD.	R.12.A (and R.01.A) to be removed.
142	Transport for London	5.6 Resources	<ul style="list-style-type: none"> The relationship between code R.07.A (or any other of the area-wide resources codes) and figure 8 is unclear. Is it intended that the buildings shown on figure 8 should be retained and reused and have these buildings been selected according to a heritage or character assessment? Or does figure 8 simply represent examples of buildings that should be considered for reuse, adaptation and retrofitting? It may be worth having a code that talks about the process rather than the outcome, given that it is difficult to specify outcomes for individual buildings – for example, stating that the default (in some areas at least) should be reuse and adaptation, in line with Circular Economy policies, and that demolition/replacement needs to be justified by undertaking appropriate assessments. [We note that code L.06.A identifies urban design analysis as a suitable process to feed into design of play spaces, so there is a case for a similar approach to heritage assessments and questions of demolition or retention.] 	As indicated in the key, Figure 8 represents examples of buildings of notable architectural character that should be considered for reuse, adaptation or retrofitting.	Figure 8 to be removed. R.07.A to be removed and replaced – see I.03, I.06.NCR and I.05.CGR.
143	Transport for London	6.1 North Circular Road	<ul style="list-style-type: none"> As stated above, all proposals affecting the management or operation of the North Circular Road will need to be agreed with TfL as the highway authority for the TLRN and details submitted for approval. It may not be realistic to achieve all the aspirations for North Circular Road shown in figures 10 and 11 and detailed in the specific proposals. The aspirational section could be taken as a proposal appropriate to all locations rather than an indicative way of reallocating space. It would benefit from being more clearly labelled and caveated. Although we support the principle of introducing greening and SUDS to help meet the Mayor's environmental policies, we would question the configuration that has pedestrians adjacent to the carriageway. It 	<p>A coordination meeting between TfL and LB Brent to discuss these representations and officers' responses took place on 24th January 2024. Further clarity on the ambitions of the Design Code was provided by LB Brent officers and the street section drawings were agreed in principle.</p> <p>For the avoidance of doubt, no changes are proposed to the North Circular Road within the highway boundary beyond the suggestion of planting to the central reservation. Concerns over the safety of TfL contractors maintaining planted central reservations are understood and these have been omitted from the street section drawings.</p>	6.1 to be updated.

			<p>is unclear on the purpose of the buffer zone and who will be responsible for its long term maintenance. If it is for screening or noise mitigation of sensitive receptors then this should be addressed through the agent of change principle. The buffer zone shouldn't encroach into the existing highway, or any additional land TfL would require to maintain the highway. The proposed green estate in the central reserve is likely to be hazardous for TfL contractors to maintain in the long term, so the type of green estate that could be accommodated here needs to be carefully considered. Specific proposals should be discussed with and approved by TfL before inclusion in the design code or masterplan.</p>	<p>As the street-focused design codes will form basis of the next iteration of the Design Code, clearer labelling and caveats has been included to clarify that all aspirational sections for all streets are an indicative way of reallocating space and do not represent final proposals.</p> <p>Generally, the provision of landscaped buffers has been shifted onto landowners as this was considered by officers to be the most effective, albeit potentially piecemeal way to deliver improvements, though concerns over maintenance responsibilities are understood and will be reviewed.</p>	
144	Transport for London	6.1 North Circular Road	<ul style="list-style-type: none"> Alterations to carriageway widths, minimum widths for buffer zones, building set-backs and tree planting may not be possible in all locations and require consistent treatment. It is unclear how these changes could be achieved through the planning system because development sites will come forward individually. We welcome the requirement that car parking must not be provided at the front of sites along the North Circular Road but this could be extended to a requirement to minimise car parking and to rationalise the number of access points. 	<p>Taking each in turn:</p> <ul style="list-style-type: none"> M.03.B – relates to the reduction of carriageway widths where large extents of painted hatching currently exist and, as such, the related carriageway is assumed to be surplus to requirement. B.01.B – relates to building setbacks and requires a minimum setback of 7.5 metres based on the prevailing building lines in the area, though it is acknowledged this will not be achievable on every site, particularly smaller sites. However, the aspiration would be for smaller sites to be parcelled together to form larger and more viable development opportunities – commentary on land assembly and approaches to delivery will be covered in the relevant section of the emerging Masterplan & Design Code SPD. N.01.B – relates to tree planting (see 136) N.02.B – also relates to tree planting (see 136) <p>Commentary on parking provision is covered under Policy BT2 Parking and Car Free Development of the Brent Local Plan and also relevant car parking policies found in the London Plan. Some reference is also made to car parking under the 'Working Assumptions' in the emerging Masterplan & Design Code SPD.</p> <p>Potential for the rationalisation of access points has been reviewed and is considered to be appropriately covered by the existing design codes relating to where parking should and should not be located within development sites.</p>	No proposed change.
145	Transport for London	6.1 North Circular Road	<ul style="list-style-type: none"> B.01.B indicates a setback of 7.5 metres but this may not be practical or desirable in all parts of the area covered by this code. 	Noted – see 144.	No proposed change.
146	Transport for London	6.2 Edgware Road	<ul style="list-style-type: none"> As stated above, all proposals affecting the management or operation of the Edgware Road will need to be agreed with TfL as the traffic authority for the SRN and details submitted for approval. It may not be realistic to achieve all the aspirations for Edgware Road shown in figures 12 and 13 and detailed in the specific proposals. We are not clear why a two-way cycle track has been proposed on the western side of Edgware Road and whether this is the best option for cycling or whether this relates to the split management responsibility for Edgware Road. The illustration shows trees that obscure traffic signals, and reduce visibility between bus passengers and bus drivers. It needs to be clear that this is only indicative and not a blueprint. Bus stop cage length will also depend on the number of buses (both routes and frequency) that use the stop. 	<p>A coordination meeting between TfL and LB Brent to discuss these representations and officers' responses took place on 24th January 2024. Further clarity on the ambitions of the Design Code was provided by LB Brent officers and the street section drawings were agreed in principle.</p> <p>For the avoidance of doubt, no changes are proposed to Edgware Road within the highway boundary beyond the suggestion of planting to the central reservation. Concerns over the safety of TfL contractors maintaining planted central reservations are understood and these have been omitted from the street section drawings.</p> <p>As the street-focused design codes will form basis of the next iteration of the Design Code, clearer labelling and caveats will be included to clarify that all aspirational sections for all streets are an</p>	6.2 updated.

				<p>indicative way of reallocating space and do not represent final proposals.</p> <p>The provision of a two-way cycle route to the western side of Edgware was considered appropriate given the split management responsibility for Edgware Road and officers felt the aspirational sections should only focus on LB Brent owned land.</p>	
147	Transport for London	6.2 Edgware Road	<ul style="list-style-type: none"> Alterations to carriageway widths, minimum widths for buffer zones, building set-backs and tree planting may not be possible in all locations and require consistent treatment. It is unclear how these changes could be achieved through the planning system because development sites will come forward individually. We would support an additional requirement that car parking must not be provided at the front of sites along the Edgware Road (similar to North Circular Road) and to extend this to include a requirement to minimise car parking and to rationalise the number of access points. 	<p>Taking each in turn:</p> <ul style="list-style-type: none"> M.06.B – relates to the reduction of carriageway widths where large extents of painted hatching currently exist and, as such, the related carriageway is assumed to be surplus to requirement. B.02.B – relates to building setbacks and requires a minimum setback of 6 metres based on the prevailing building lines in the area, though it is acknowledged this will not be achievable on every site, particularly smaller sites. However, the aspiration would be for smaller sites to be parcelled together to form larger and more viable development opportunities – commentary on land assembly and approaches to delivery will be covered in the relevant section of the emerging Masterplan & Design Code SPD. N.04.B – relates to tree planting (see 136) N.05.B – also relates to tree planting (see 136) <p>Commentary on parking provision is covered under Policy BT2 Parking and Car Free Development of the Brent Local Plan and also relevant car parking policies found in the London Plan. Some reference is also made to car parking under the ‘Working Assumptions’ in the emerging Masterplan & Design Code SPD.</p> <p>Potential for the rationalisation of access points has been reviewed and is considered to be appropriately covered by the existing design codes relating to where parking should and should not be located within development sites.</p>	No proposed change.
148	Transport for London	6.2 Edgware Road	<ul style="list-style-type: none"> The requirement in N.04.B may need to be more flexible – we wouldn’t want to preclude having tree planting and other soft landscaping if a strip of less than 2 metres were available. Again, this may need a suitable caveat to say this is only one indicative way of reallocating the space. Doubling-up the footway around a linear green feature may work well in some cases but is unlikely to be appropriate or the most efficient use of space throughout the area. 	<p>N.04.B is specific to tree planting buffer zones, which are required to be a minimum of 6 metres – this design code refers to B.02.B accordingly. Notwithstanding, this does not preclude tree planting in other situations and this will be reviewed with the LB Brent tree officer.</p>	No proposed change.
149	Transport for London	6.3 Oxgate Lane	<ul style="list-style-type: none"> Although TfL is not the highway or traffic authority, similar comments apply to those for North Circular Road and Edgware Road regarding issues of feasibility, consistency of treatment and difficulties in co-ordinating with development proposals. The text identifying that parking provision could be provided in small clusters on street appears to conflict with the aspirations for reducing vehicle dominance and the prioritisation of walking and cycling. In some cases on-street parking could be combined with planting but this may not be appropriate throughout the area. Generally, the caveat should be added that this is one, suggested way that the space may be reallocated. Given that the dimensions are tighter in this street, it would also be useful to know which aspects are essential and whether others can be traded off against one another, e.g. could some of the trees and SUDS categories or the two footpaths on each side be combined? 	<p>As the street-focussed design codes will form basis of the next iteration of the Design Code, clearer labelling and caveats will be included to clarify that all aspirational sections for all streets are an indicative way of reallocating space and do not represent final proposals.</p> <p>Notwithstanding, these aspirations have been tested with LB Brent officers and are informed by more detailed work undertaken by transport planners and engineers at Alan Baxter Associates. This work has also informed the relevant spatial strategies that will be covered in the emerging Masterplan & Design Code SPD, though it is worth highlighting that no reference is made to the provision of car parking in small clusters in Section 6.3.</p>	No proposed change.

			<p>Doubling up on footways may not always be an efficient use of the space where footfall is low– it may be appropriate for specific reasons in some locations but it would be useful to specify what these are, otherwise it will be treated as a minimum requirement. There is no justification for why 7.5 metres has been chosen as an ideal carriageway width. It would be useful to indicate a range of possibilities here and/or widths to be avoided (see comments under movement section above).</p>	<p>It is felt there is generally sufficient flexibility within the suggested reallocation of space to allow for a degree of interpretation. For example (see 122) the cycleway could be extended to 3.5 metres by omitting the adjacent SUDS buffer and reducing this to 0.5 metres in line with the LCDS recommendations. This could be further extended to 4 metres by omitting the SUDS buffer to the other side of and realigning the carriageway.</p> <p>Carriageway widths were tested with LB Brent officers and the approach to these has been reviewed.</p> <p>A coordination meeting between TfL and LB Brent to discuss these representations and officers' responses took place on 24th January 2024. Further clarity on the ambitions of the Design Code was provided by LB Brent officers and the street section drawings were agreed in principle.</p>	
150	Transport for London	6.4 Coles Green Road (North)	<ul style="list-style-type: none"> Although TfL is not the highway or traffic authority, similar comments apply to those for North Circular Road and Edgware Road regarding issues of feasibility, consistency of treatment, lack of funding and difficulties in co-ordinating with development proposals. Same comments as for Oxgate Lane – there should be guidance as to how much flexibility exists in the allocation of space, where functions could be combined and what range of carriageway widths would be appropriate. 	<p>Noted – see 149 generally.</p> <p>It is worth highlighting that no reference is made to the provision of car parking in small clusters in Section 6.4.</p> <p>It is felt there is generally sufficient flexibility within the suggested reallocation of space to allow for a degree of interpretation. For example (see 122) the cycleway could be extended to 4 metres by omitting the adjacent trees and SUDS buffer and reducing this to 0.5 metres in line with the LCDS recommendations. Tree planting (and SUDS) would then need to be delivered within the curtilage of individual sites as and when they came forward for redevelopment.</p>	No proposed change.
151	Transport for London	6.5 Coles Green Road (South)	<ul style="list-style-type: none"> Although TfL is not the highway or traffic authority, similar comments apply to those for North Circular Road and Edgware Road regarding issues of feasibility, consistency of treatment and difficulties in co-ordinating with development proposals. 	<p>Noted – see 149 generally.</p> <p>It is worth highlighting that no reference is made to the provision of car parking in small clusters in Section 6.5.</p> <p>It is felt there is generally sufficient flexibility within the suggested reallocation of space to allow for a degree of interpretation. For example (see 122) the cycleway could be extended to 4 metres by reducing the adjacent trees and SUDS buffer to 1 metre and omitting the potential for tree planting, unless delivered within the curtilage of individual sites as and when they came forward for redevelopment.</p>	No proposed change.
152	Transport for London	6.6 Brook Road	<ul style="list-style-type: none"> Although TfL is not the highway or traffic authority, similar comments apply to those for North Circular Road and Edgware Road regarding issues of feasibility, consistency of treatment and difficulties in co-ordinating with development proposals. 	<p>Noted – see 149 generally.</p> <p>It is worth highlighting that no reference is made to the provision of car parking in small clusters in Section 6.5.</p> <p>It is felt there is generally sufficient flexibility within the suggested reallocation of space to allow for a degree of interpretation. For example (see 122) the cycleway could be extended to 4 metres by reducing the adjacent trees, SUDS and incidental play buffer to 1.5 metres.</p>	No proposed change.
153	Transport for London	7.1 Staples Cross	<ul style="list-style-type: none"> Although TfL welcomes the priority given to pedestrians and cyclists, any specific proposals such as at grade crossings will need to be subject to approval from relevant authorities and may require a full safety assessment. We welcome the statement that car parking must not be provided at the front of Edgware Road or the adjoining roads. This could be extended to include a requirement to minimise car parking and to rationalise the 	<p>M.08.C sets out an aspiration for an at grade crossing at 'Staples Cross' – whilst strategically important for the movement network and a recurring issue arising from engagement, it is not considered possible for this Design Code to enforce that it 'must' be delivered, only that it 'should' and (albeit implicitly) notwithstanding relevant negotiations and approvals.</p>	M.08.C to be removed – commentary on the provision of a new at grade crossing to the NCR will be covered under 'Infrastructure Projects' in the emerging Masterplan & Design Code SPD.

			number of access points. We also welcome the requirement that any public realm improvements should consider arrivals from and waiting at bus stops. This could be extended to a need to consider improved bus infrastructure such as additional standing space, drivers facilities or priority measures where required.	Commentary on parking provision is covered under Policy BT2 Parking and Car Free Development of the Brent Local Plan and also relevant car parking policies found in the London Plan. Some reference is also made to car parking under the 'Working Assumptions' in the emerging Masterplan & Design Code SPD.	
154	Transport for London	7.2 The Broadway	<ul style="list-style-type: none"> Although TfL welcomes the priority given to pedestrians and cyclists, any specific proposals such as a new pedestrian crossing across Edgware Road will need to be subject to approval from relevant authorities and may require a full safety assessment. We welcome the requirement that servicing bays should not be provided on Edgware Road. We welcome the statement that car parking must not be provided at the front of Edgware Road or the adjoining roads. This could be extended to include a requirement to minimise car parking and to rationalise the number of access points. We also welcome the requirement that any public realm improvements should consider arrivals from and waiting at bus stops. This could be extended to a need to consider improved bus infrastructure such as additional standing space, drivers facilities or priority measures where required. 	<p>M.12.C sets out an aspiration for an at grade crossing at 'The Broadway' – officers consider this critically important for the movement network and wider public transport accessibility, and as such it is felt necessary for this Design Code to enforce that it 'must' be delivered, (albeit implicitly) notwithstanding relevant negotiations and approvals. Initial feasibility work is underway in collaboration with LB Barnet.</p> <p>Commentary on parking provision is covered under Policy BT2 Parking and Car Free Development of the Brent Local Plan and also relevant car parking policies found in the London Plan. Some reference is also made to car parking under the 'Working Assumptions' in the emerging Masterplan & Design Code SPD.</p>	M.12.C to be removed – commentary on the provision of a new at grade crossing to Edgware Road will be covered under 'Infrastructure Projects' in the emerging Masterplan & Design Code SPD.
155	Transport for London	7.3 Oxgate Lane	<ul style="list-style-type: none"> Given code P.03.A that promotes an uninterrupted public realm, it would be useful to have elements of the Oxgate Lane place code that help deliver this – for example, raised side road entry treatments (although see note below about raised tables) or continuous footways. 	Noted.	7.3 to be removed and made specific to Oxgate Lane and other relevant streets – see P.01.OGL, P.01.HBR, P.01.WLR and P.02.NSS.
156	Transport for London	7.4 Oxgate Circus	<ul style="list-style-type: none"> We note that M.31.C mentions the possibility of a raised table at the junction. Where these occur on bus routes, they should be designed in accordance with TfL's Traffic Calming on Bus Routes 2005. 	Noted.	7.4 to be removed.
157	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	General	<p>In the main, our client is supportive of the Council's preparation of a Masterplan (and Design Code) to facilitate transformational regeneration at Staples Corner, including modern, intensified industrial and logistics floorspace in line with established policy for the SIL and Growth Area. It will be important to ensure that all major landowners are consulted and work cooperatively with the Council to ensure the Masterplan optimises the potential of the Growth Area and individual sites/planning applications can come forward in line with the framework created by the Masterplan and Design Code.</p> <p>However, we do have some concerns regarding the approach that has been taken to date.</p>	Noted.	No proposed change.
158	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	General	<p>Firstly, in procedural terms, the Design Code should not be progressed prior to the publication of the Masterplan:</p> <ul style="list-style-type: none"> Masterplans are one of the most important place-making tools available to Councils and delivery partners, providing the spatial frameworks that are often required to unlock large-scale regeneration and to establish overall place-making strategies and key parameters for future development. By contrast, the Design Code should be subservient to the Masterplan. Its function should be to provide a manual for future detailed design, in order to ensure that design quality is upheld through the planning process; As currently drafted, the Design Code is long and repetitive in its presentation. Moreover, some of the content may ultimately better be included in the Masterplan; At this stage, the draft Masterplan has yet to be published; 	<p>As set out in paras 4.1.2 to 4.1.5, this Design Code was consulted on in advance of the masterplan as a 'moment in time' to help shape the masterplan's ongoing development and provide a relative degree of certainty to potential applicants. Para 4.1.3 in particular clearly states the council's intentions for the Design Code to become, "<i>an important part of the future Staples Corner Masterplan SPD. Therefore, the Design Code will remain at 'draft' status after its consultation period has closed and until such a time that the Masterplan SPD is adopted.</i>"</p> <p>As this Design Code is developed and integrated into the emerging Masterplan & Design Code SPD, it will be streamlined, with much of its content superseded by the relevant spatial strategies of the masterplan. The next iteration of the Design Code will focus on streetscape and character, with only generally street-focussed design</p>	No proposed change.

			<ul style="list-style-type: none"> Therefore the Design Code should not be progressed further until the Staples Corner Masterplan SPD has been developed, consulted upon, and adopted. 	codes to be retained alongside some relevant area-focussed and place-focussed design codes that will be updated accordingly.	
159	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	General	<p>Secondly, in order to support the previously established policy vision for Staples Corner, the Design Code should support the transformational change for Staples Corner set out in the Local Plan, which includes significant intensification of the SIL:</p> <ul style="list-style-type: none"> Given the dual-designated status of Staples Corner as a Growth Area <i>and</i> SIL, intensification is a requirement under Policy E5 (Strategic Industrial Locations) of the London Plan. Policy E5 requires Boroughs to explore opportunities to intensify and make more efficient use of land within SILs; The overarching vision for Staples Corner should remain one of optimising the overall quantum of development in order to make the most efficient use of land, meet identified employment land needs and support economic growth. 	Sections 3.3 and 3.5 clearly demonstrate that the intensification of industrial uses is a core part of the vision for Staples Corner, alongside other placeshaping objectives. As such, the Design Code is considered to support the policy aims of the Brent Local Plan, whilst setting appropriate and proportionate parameters for how transformational changes should be delivered. Officers do not consider that the vision should be solely based on optimising the overall quantum of development.	No proposed change.
160	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	General	<p>Thirdly, the Design Code should be sufficiently flexible to adapt to changing circumstances over the lifetime of the Staples Corner regeneration process:</p> <ul style="list-style-type: none"> The Design Code should incorporate sufficient flexibility over the medium and long-term, i.e. covering the Local Plan period and future changes in economic circumstances; Strategic regeneration projects often span several business cycles (and Local Plan periods). Operational business requirements can change over time. In addition, there may be opportunities for development in the future to take account of emerging opportunities, for example arising from enhanced use of technology and carbon reduction; To that end, the Design Code should avoid prescribing particular outcomes, such as specific building typologies. By contrast, it should seek to provide a positive framework to enable intensification in general, taking into consideration site-specific factors and ensuring a coordinated approach towards development across the Masterplan area; The National Planning Policy Framework (“NPPF”, 2023) advocates exactly this approach. It confirms that the planning system should “help to build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improve productivity” (Para. 8). It also states that planning policies “should be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances” (Para. 82); In addition, the ultimate delivery of regeneration at Staples Corner will rely on a co-ordinated approach by different landowners working in collaboration with the Council. In this way, the Masterplan and Design Code should recognise landownership boundaries and provide sufficient certainty to overcome any associated delivery challenges. Strategic improvements sought by the Council (such as new streets and 	<p>To ensure it meets DLUHC expectations that design codes are practical, legible and enforceable, this Design Code will need to balance allowing flexibility against giving certainty to developers and other stakeholders, including the council itself. Where possible, this Design Code sets out specific and quantitative requirements to give that certainty – these have been tested with LB Brent officers and are considered to proportionate.</p> <p>The next iteration of the Design Code will focus on streetscape and character, and building typologies can be contributing factors in defining the character of an area. As such, it may be necessary in some areas for this Design Code to set out design codes that identify appropriate building typologies, giving clarity to landowners, developers and design teams.</p> <p>Notwithstanding, comments relating to the delivery timeline of large scale, strategic masterplans are understood and commentary on this matter as well as review mechanisms will be covered under ‘Illustrative Masterplan’, ‘Alternative Site Briefs’ and ‘Delivery Approach & Phasing’ in the emerging Masterplan & Design Code SPD.</p>	No proposed change.

			connections) should be articulated in such a way that the SIL can continue to operate effectively if an individual landowner decides not to progress redevelopment within the Local Plan-period. This approach will ensure that existing buildings and uses can continue to work effectively as neighbouring sites intensify. It will also enable the potential for transformational change to be unlocked; thereby potentially creating a catalyst effect to accelerate delivery across the Growth Area.		
161	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	General	<p>Finally, detailed comments on specific parts of the Design Code are provided in Appendix 1. Most importantly, the Council should ensure the following:</p> <ul style="list-style-type: none"> • Design coding contained in the document should be clear, achievable and measurable. As drafted, this is not always achieved resulting in uncertainty (i.e. subjective interpretation) and inconsistency (within the Design Code and with the adopted Development Plan). Similarly, the Design Code should be comprehensive and not require the preparation of further design guidance in the future; • Some elements, such as sustainability targets, need not form part of the Design Code. The reason being they are sufficiently covered in the adopted Development Plan which, if updated from time to time, will be a better place to guide those aspects. The Design Code may refer to the adopted Development Plan (and its successor document), as applicable at the time when individual redevelopment proposals come forward; • The Design Code should also not seek to replicate the scope or content of a vision statement, Development Brief or Masterplan. It should focus on design-related coding (see our comments above in relation to the Design Code being subservient to the Masterplan); • Alternatively, consideration could be given to merging the Masterplan and Design Code, to create a single document guiding the future regeneration of the area. The London Legacy Development Corporation's Bromley-by-Bow SPD (2017) is a successful example of where this approach has been utilised. 	<p>Para 4.1.3 in particular clearly states the council's intentions for the Design Code to become, <i>"an important part of the future Staples Corner Masterplan SPD. Therefore, the Design Code will remain at 'draft' status after its consultation period has closed and until such a time that the Masterplan SPD is adopted."</i></p> <p>As this Design Code is developed and integrated into the emerging Masterplan & Design Code SPD, it will be streamlined, with much of its content superseded by the relevant spatial strategies of the masterplan. The next iteration of the Design Code will focus on streetscape and character, with only generally street-focussed design codes to be retained alongside some relevant area-focussed and place-focussed design codes that will be updated accordingly.</p> <p>Commentary on sustainability and achieving net zero will be covered in the relevant spatial strategy in the emerging Masterplan & Design Code SPD.</p>	No proposed change.
162	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	1.5 Where does this Design Code apply?	<p>States that the document has been defined to guide development proposals in two key areas, namely:</p> <ul style="list-style-type: none"> • The Growth Area; and • Transitional areas along the Growth Area boundary. <p>We are supportive of measures to promote an effective transition between the Growth Area and its surroundings. However, the three transitional areas (A, B and C) are of a much finer urban grain than the Growth Area and contain a number of existing residential dwellings. It is unclear how the redevelopment of these areas will be achieved (i.e. if a Compulsory Purchase Order ('CPO') will be pursued). The Design Code (or the Masterplan SPD) should clarify this point, to ensure that its vision is achievable and deliverable. Otherwise, it may be worth considering the removal of those areas.</p>	<p>Noted.</p> <p>Whilst the ambition is for this Design Code is to apply to those edges or 'transitional areas' that straddle the Growth Area boundary and are principally focussed on where the industrial uses of Staples Corner directly interface with neighbouring residential uses, they are undesignated within the Brent Local Plan. It is therefore difficult to include them within the emerging Masterplan & Design Code SPD, and risks causing confusion as to where the SPD does and does not apply.</p>	All references to transitional areas to be removed.
163	Turley (on behalf of Goodman,	2.7 Buildings (Building Typology)	Identifies six industrial building typologies. It states that they give a "picture of the existing building stock" and adds that "further analysis	As set out in para 2.7.3, <i>"Defining these typologies gives a clearer picture of the existing building stock and further analysis could inform the design principles of future development across Staples Corner."</i>	2.7 to be removed.

	owner of Staples Corner Business Park)		<p><i>of these could inform the design principles of future development across Staples Corner.”</i></p> <p>It is unclear why the existing industrial buildings in the area have been classified into typologies. The typologies are derived from a mix of factors such as age, building height, location, access arrangements, unit size and mix, but few of the typologies are unique across two or more of these categories. The result is that individual typologies lack significance. For example, there is considerable overlap between the “standalone big box industrial” and “fine grain industrial” typologies, which both appear to be one- and two-storey, logistics-oriented units with good access to the North Circular Road. Accordingly, the typologies ought not to form part of the Design Code.</p> <p>Indeed, if applied to new developments (for example as set out in Para. 2.7.3), the typologies would limit opportunities for the development of innovative new forms of development, which would be contrary to the established policy objectives for intensification and “transformational change”.</p> <p>Future typologies for industrial uses should be determined through the development management process, taking account of site-specific factors, surrounding uses, operational requirements, sustainability objectives, urban design/townscape testing, local views, and the requirements of industrial and logistics occupiers.</p> <p>In summary, the sole purpose of this section should be to describe the status quo of the Growth Area. The Design Code should not restrict new development to a specific existing typology.</p>	<p>There is no suggestion these typologies be applied to new developments, only that they might (through a design-led process) inform development proposals.</p> <p>The next iteration of the Design Code will focus on streetscape and character, and building typologies can be contributing factors in defining the character of an area. As such, it may be necessary in some areas for this Design Code to set out design codes that identify appropriate building typologies, giving clarity to landowners, developers and design teams.</p>	
164	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	3.2 The ‘Guiding Principles’	<p>Sets out six ‘Guiding Principles’ to inform future development. The principles are based on the design code themes set out in the National Model Design Code, as well as the ten characteristics of well-designed places set out in the National Design Guide.</p> <p>We support the six Guiding Principles, which are considered to satisfy the requirement of NPPF Paragraph 128 to ensure that design codes are consistent with the principles set out in the National Design Guide and National Model Design Code.</p> <p>However, despite the designation of Staples Corner as a SIL and Growth Area, we note that only one of the six Guiding Principles (‘Unlock Value’) touches on the significant role that Staples Corner should play in generating economic growth and employment opportunities.</p> <p>Therefore, we recommend that an additional ‘Guiding Principle’ entitled ‘Economic Growth’ should be added to emphasise the significant economic contribution that proposals for new development within the Growth Area will be expected to deliver.</p>	<p>Paras 3.1.1 to 3.1.6 clearly set out that, “<i>the guiding principles are reflective of a structured, ongoing engagement process with [a] democratically-selected group of Community Champions [...] to ensure that local needs and ambitions are reflect in emerging development proposals.</i>” Officers do not consider it appropriate to introduce additional principles that have not been developed as part of the engagement process. It should also be noted that the masterplan engagement process led to a refinement of the guiding principles and these will be set out in the emerging Masterplan & Design Code SPD.</p>	No proposed change.
165	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	3.3 Vision Statement	<p>Identifies Staples Corner as “<i>a thriving industrial place with a rich mix of uses and efficient servicing</i>”.</p> <p>This recognition is strongly supported, given the scale and importance of the existing SIL designation. This part of the Vision Statement should inform the design coding, to enable employment-led intensification to be successfully delivered.</p>	<p>Noted – again, refer to para 4.1.3 on the status of the Design Code relative to the Masterplan & Design Code SPD.</p>	Update vision statement: “ <i>identity and character that offers balanced density for housing and intensified employment needs</i> ”

			<p>The Vision Statement also provides for “<i>identity and character that offers balanced density for housing and employment needs</i>”.</p> <p>This wording does not adequately reflect the established policy provision for intensification of industrial, logistics and related functions within SIL. London Plan Policy E7 and Local Plan Policy BE2 are both clear that the masterplan-led introduction of residential development within SIL should be contingent on the achievement of a net increase in industrial and logistics floorspace. At present, the Vision Statement is unclear on this point, and risks giving the misleading impression that residential development will be achieved at the expense of the existing supply of industrial and logistics floorspace in the SIL.</p> <p>Therefore, it is considered that this section of the Vision Statement should be re-worded to provide for “<i>identity and character that offers balanced density for housing and intensified employment needs</i>”, thereby ensuring consistency with the Development Plan and NPPF (Chapter 11).</p> <p>It is also noted that the Vision Statement may be better placed in the forthcoming Masterplan SPD, rather than the Design Code (which should sit beneath the SPD and predominantly help to implement its vision).</p>		
166	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	3.4 Vision Priority: Placeshaping	<p>Suggests that place-shaping should “<i>Support the ongoing success of Staples Corner as an industrial area serving a variety of needs</i>”.</p> <p>Similarly, the Vision Statement for the Staples Cross Character Area (Page 82) identifies Staples Cross as “<i>A city-wide landmark that celebrates the heritage and industrial character of the wider area</i>”.</p> <p>The recognition of Staples Corner as a predominantly industrial area is welcomed. However, these statements are backwards-looking and inconsistent with Local Plan Policy BP2, which supports “<i>transformational change of Staples Corner [...] to provide co-location/intensification and a wide range of new business premises fit for modern day occupiers in association with a new mixed-use community.</i>”</p> <p>The Vision Priorities and Statements should be amended in order to signpost the “<i>transformational change</i>” envisioned by the Local Plan. Staples Corner is a designated SIL, which carries specific obligations and opportunities. The London Plan is clear that SILs should be managed proactively through a plan-led process to sustain them as London’s largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London’s economy (Policy E5) and that planning frameworks should be proactive and consider whether certain logistics, industrial and related functions could be intensified to provide additional industrial capacity (Policy E7).</p> <p>In summary, we consider that the place-shaping aspirations (Page 37) and the Vision Statement for Staples Cross (Page 82) should be amended to clearly reference the intensification and “<i>transformational change</i>” sought for the area by the London Plan and Local Plan. Furthermore, they should promote the significant</p>	Noted – the vision priorities have been superseded by the visioning set out in the emerging Masterplan & Design Code SPD.	3.4 to be removed.

			contribution to economic growth and job creation that future regeneration could achieve.		
167	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	3.5 Vision Priority: Intensify Industrial	<p>Sets out the Vision Priority for the intensification of Staples Corner.</p> <p>We agree with the identification of this topic as a Vision Priority. However, the present title focuses too narrowly on the intensification of “<i>industrial</i>” uses (i.e. Class B2). In accordance with London Plan Policy E4, reference should be made to a wider range of related functions and uses acceptable within SIL, including storage and distribution (Class B8). The London Plan is clear that the varied operational requirements of these related functions should be met through the retention, enhancement, and provision of additional capacity.</p> <p>To this end, we consider that the title of the Vision Priority should be changed from “<i>Intensify Industrial</i>” to “<i>Intensify the Strategic Industrial Location</i>” or “<i>Intensify our essential Economic Infrastructure</i>” to ensure that it caters for the full range of employment uses set out in London Plan Policy E4(A).</p> <p>We also support the first point of the Vision Priority, which seeks to achieve improved connections to the A406 North Circular Road and strategic road network. The appeal of Staples Corner to industrial and logistics occupiers is informed by its proximity to the North Circular Road and wider strategic road network (“SRN”). The future success of the Growth Area will therefore be dependent on maintaining and securing improvements in connectivity to these routes.</p> <p>The fourth point of the Vision Priority seeks to deliver ambitious industrial intensification and new jobs by creating incentives for landowners to intensify their sites. These “<i>incentives</i>” should be clearly defined, because at this stage the meaning is unclear.</p> <p>The fifth point of the Vision Priority seeks to co-locate industrial and residential uses, where suitable. It is imperative that the introduction of residential uses within the Growth Area does not prejudice the ongoing 24/7 operation of the intensified SIL. The Goodman Site is considered to be highly suitable for employment-led intensification on account of its location at the heart of the SIL, excellent connectivity to the North Circular and SRN, and distance from existing residential development. However, for those same reasons, it is not considered to be a suitable location for co-location with residential uses. Therefore, residential development should not be introduced in close proximity to the Goodman Site, to protect its future SIL function. If new residential development is proposed, it should be positioned on the southern and western edges of the Growth Area.</p> <p>The ninth point of the Vision Priority relates to the provision of active frontages.</p> <p>We would note that active frontages are not feasible in certain locations, especially where a significant level of industrial intensification is proposed. For example:</p> <ul style="list-style-type: none"> • Multi-storey typologies can require the provision of access ramps; • Certain occupiers may have particular security requirements; and 	Noted – the vision priorities have been superseded by the visioning set out in the emerging Masterplan & Design Code SPD.	3.5 to be removed.

			<ul style="list-style-type: none"> Inward-facing activity may be necessary as a design response to mitigate noise and provide for 24-hour uses close to residential areas. Indeed, the London Plan already acknowledges that SIL accommodates “activities which – by virtue of their scale, noise, odours, emissions, hours of operation and/or vehicular movements – can raise tensions with other land uses” (Paragraph 6.5.1). <p>Therefore we recommend that the ninth point is re-worded as follows to acknowledge that the provision of active frontages within new development will be subject to feasibility considerations:</p> <p><i>“9) Embed active frontages and change industrial building character from inward to outward facing, where feasible in light of operational requirements.”</i></p> <p>A similar caveat should also be applied to other references to active frontages within the document – specifically, those on Page 56 (Para 5.3.1 Bullet 1) and Page 85 (Design Code B.06.C).</p> <p>Nonetheless, we strongly support wider ambitions that future regeneration at Staples Corner should exhibit high quality architecture and urban design/placemaking.</p>		
168	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	3.7 Vision Priority: Health & Wellbeing (3.7.5)	<p>London Plan Policy D13 (Agent of Change) places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Boroughs must ensure that local planning policies reflect the <i>Agent of Change</i> principle and take account of existing noise generating uses when new development is proposed.</p> <p>The Design Code does not currently reflect Agent of Change principles, which are of direct relevance given the aspirations to introduce noise-sensitive residential development within the SIL.</p> <p>Page 41 contains the only reference to ‘noise’ in the entire document, and the term ‘Agent of Change’ is not mentioned at all.</p> <p>Given the importance of good design to mitigating and minimising existing and potential noise impacts, it is considered that design coding should be included to require all proposals for new residential development to comply with Agent of Change principles and to ensure that industrial uses in the SIL can continue to operate without constraint and on a 24/7 basis.</p>	Noted – the vision priorities have been superseded by the visioning set out in the emerging Masterplan & Design Code SPD.	3.7 to be removed.
169	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	4.3 Character Areas (Staples Cross)	<p>We broadly agree with the Council’s vision for Staples Cross, which is the character area within which the Goodman Site is located.</p> <p>However, the character area description is too general and pays insufficient regard to the character area’s SIL designation (and associated policy requirements).</p> <p>The sixth point also provides for a “green buffer zone” adjacent to the North Circular Road. We are concerned that no definition of this feature is provided. Moreover, we consider that development proposals could utilise a range of means to address the North Circular Road, including attractive building elevations, a strategic approach to scale, massing, and articulation, and high quality hard and soft landscaping.</p>	Noted.	4.3 to be removed.

			<p>To that end, we consider that the description should be amended, to emphasise the character area’s important role within the SIL, its potential to serve as an exemplar of industrial intensification, and the opportunity for an improved frontage to the North Circular Road, as follows:</p> <p><i>“A place as it might be:</i> 1) An exemplar <i>of SIL intensification.</i> 2) Signature gateway architecture and identity. 3) <i>SIL-compliant</i> uses supporting gateway location. 4) Opportunity for high density development <i>significantly taller buildings to accommodate SIL intensification.</i> 5) Safe and legible public realm that prioritises pedestrians and cyclists. 6) Enhanced green buffer zones and set back from the North Circular Road. <i>Improved frontage to the North Circular Road.</i>”</p> <p>We also note that six character areas are identified on Page 46, however Section 7 only provides detailed guidance for four of the areas. In order to provide a more comprehensive approach, the Design Code should consider all of the areas.</p>		
170	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	5.1 Movement	<p>We are supportive in principle of improving movement and connectivity within Staples Corner. However, M.03.A and M.09.A require further refinement. They currently state that:</p> <p><i>“New streets and connections must be delivered through comprehensive and area-wide approach to movement and permeability”;</i> and</p> <p><i>“A comprehensive and area-wide approach should be taken to servicing and vehicle movements.”</i></p> <p>These provisions should be revised, because it is unclear how a comprehensive and area-wide approach will be deliverable, especially in absence of the Masterplan. New streets and connections are likely to span multiple landownerships. There is no master developer for the entire Growth Area and the redevelopment of individual land parcels will need to be the subject of individual planning applications. Therefore, the Masterplan and Design Code should recognise land ownership boundaries, a phased delivery and enable the regeneration potential of each area to be realised.</p> <p>Figure 4 shows a <i>“connecting route with cycle and pedestrian facilities”</i> along the northern boundary of the Goodman Site and a <i>“green link prioritising pedestrian movement and facilities”</i> partially through the eastern extent of the Goodman Site. These routes should be deleted because they fail to recognise the significant technical and physical constraints imposed by the North Circular, as well as the industrial character of the area. Any new streets and connections would need to be subject to a thorough feasibility assessment, including technical analysis as part of the development management process.</p>	<p>Commentary on the delivery of new streets and connections, and servicing and access will be covered under ‘Movement’ in the emerging Masterplan & Design Code SPD.</p> <p>In terms of Figure 4, this is informed by detailed work undertaken by transport planners and engineers at Alan Baxter Associates. This work has also informed the relevant spatial strategies that will be covered in the emerging Masterplan & Design Code SPD, though it is worth highlighting that the North Circular Road is already a connecting route with pedestrian and cycle facilities, forming part of LCN 85 to the east. The green link shown through the eastern extent of the Goodman site reflects a strategic ambition to improve accessibility to Brent Reservoir. Again, commentary on the walking and cycling strategy will be covered in the relevant spatial strategy in the emerging Masterplan & Design Code SPD.</p>	<p>Figure 4 to be removed.</p> <p>M.03.A and M.09.A to be removed.</p>
171	Turley (on behalf of Goodman, owner of	5.2 Nature	<p>Paragraph 5.2.1 states that the Council’s nature aspirations are to <i>“meet and exceed, where possible, biodiversity net gain and Urban Greening Factor”</i>.</p>	<p>Commentary on biodiversity net gain and Urban Greening Factor will be covered under ‘Environmental Sustainability’ in the emerging Masterplan & Design Code SPD.</p>	<p>5.2 to be removed.</p>

	Staples Corner Business Park)		<p>This statement does not accord with the strategic context of the London Plan. While Policy G5 (Urban Greening) of the London Plan establishes a target Urban Greening Factor ('UGF') of 0.4 for predominantly residential developments and 0.3 for predominantly commercial developments, it <i>does not provide a target UGF</i> for industrial and logistics developments (i.e. Class B2/B8).</p> <p>The London Plan approach acknowledges that industrial and logistics-led redevelopment proposals cannot achieve high UGF scores, due to the design factors such as the need to provide operational yard space, vehicle parking, functional units and other feasibility constraints.</p> <p>Notwithstanding the exclusion of Class B2/B8 uses from the target UGF, London Plan Paragraph 8.5.5 (and the Mayor's UGF LPG, 2023) states that proposals for these uses are still expected to set out what measures they have taken to achieve urban greening on site.</p> <p>Therefore, we recommend that the bullet point is amended as follows:</p> <p><i>"[meet] and exceed, where possible, biodiversity net gain and Urban Greening Factor (in line with London Plan policy)."</i></p>		
172	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	5.2 Nature	<p>N.01.A states that <i>"existing green and blue assets, and wildlife habitats, must be protected and enhanced"</i>. It is unclear to what assets and habitats this statement is intended to refer. The National Model Design Code is clear that design codes should be made up of rules that are clear, specific, and unambiguous. We therefore recommend that N.01.A be amended to specify which green and blue assets/wildlife habitats are to be prioritised for protection or enhancement. It should also be supported by a visual illustration.</p>	Noted.	N.01.A to be updated and retained as area-wide design code – see N.01.
173	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	5.2 Nature	<p>N.03.A states that a comprehensive and area-wide approach must be taken to street tree planting and the provision of other green infrastructure. In order to ensure a consistent approach between development sites, it is considered that the Design Code should indicate a range of suitable tree and shrub species for incorporation within landscaping proposals (thereby ensuring consistency and similar quality across sites). The Design Code can guide this objective, so the reference to further guidance to be developed should be deleted.</p>	Noted – opportunities where design codes relating to tree species can be added will be reviewed.	N.03.A to be removed.
174	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	5.2 Nature	<p>N.04A requires that all new and existing streets must be tree-lined. This provision is too general:</p> <ul style="list-style-type: none"> In relation to existing streets, there is no recognition that there may be insufficient room for tree pits due to building layouts or underground services; In relation to new streets, it should be recognised that elevated development levels and specific operational requirements (for example in relation to access, security and servicing) may also restrict the achievable extent of street tree planting; <p>For these reasons, N.04A should be amended to state that:</p> <p><i>"all new and existing streets must should be tree-lined where feasible in light of site constraints and operational considerations."</i></p>	Commentary on the provision of street trees will be covered in the relevant spatial strategy in the emerging Masterplan & Design Code SPD.	N.04.A to be removed.
175	Turley (on behalf of Goodman,	5.3 Built Form	B.01.A, states:	B.01.A is not intended to suggest a heritage-led approach must be taken to the built form at Staples Corner but seeks to highlight the	B.01.A to be removed – see 163.

	owner of Staples Corner Business Park)		<p><i>“The quality of built form must be enhanced to provide robust and sustainable buildings that respond to the industrial heritage and character of the Staples Corner area.”</i></p> <p>We agree with the overall ambition to enhance the quality of built form across Staples Corner.</p> <p>However, B.01.A is a heritage-led approach, and this is not appropriate to be applied across the whole of the Growth Area. By way of illustration, the Goodman Site does not contain any buildings of historic or architectural interest. In addition, the area has been allocated for intensification and <i>“transformational change”</i>. The Masterplan and Design Code should present an exciting opportunity to establish an enhanced contemporary character, with development that is sustainable and designed to be attractive to modern industrial and logistics occupiers. To that end, the wording of B.01.A should be amended as follows:</p> <p><i>“The quality of built form must be enhanced to provide robust and sustainable building designs that respond to the industrial heritage and character of the Staples Corner area. market demand and are attractive to modern businesses.”</i></p>	<p>importance of the area’s <i>“long and rich industrial legacy”</i>, as set out in paras 1.2.1 to 1.2.3.</p> <p>It is therefore considered appropriate to require that development proposals reference, respond to and reinterpret the context and character of Staples Corner to deliver transformational change, and establish the next chapter in that legacy.</p> <p>It is not considered appropriate for the built form at Staples Corner to be driven solely by market demand and specific business interests – meeting these requirements can be addressed on a site-by-site basis as part of a design-led approach through the development management process.</p>	
176	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	5.3 Built Form	<p>B.02.A states: <i>“Building lines must be set back from the North Circular Road and Edgware Road to allow for street trees and green buffers (see Section 6.1 and Section 6.2).”</i></p> <p>While we agree with the aim of establishing an effective transition between the Growth Area and North Circular Road, the precise nature of this relationship should be addressed through the development management process, taking account of site-specific factors and occupier requirements. TfL’s operational requirements for the North Circular Road will also need to be taken into account. Only once detailed technical assessments have taken place will it be clear whether <i>“street trees and green buffers”</i> are a suitable means of addressing the relationship with the North Circular Road. For this reason, we would recommend that B.02.A is deleted.</p>	<p>In support of B.02.A, B.01.B requires a minimum setback of 7.5 metres to both sides of the North Circular Road. Whilst this is based on the prevailing building lines in the area, it is acknowledged this will not be achievable on every site, particularly smaller sites. However, the aspiration would be for smaller sites to be parcelled together to form larger and more viable development opportunities – commentary on land assembly and approaches to delivery will be covered in the relevant sections of the emerging Masterplan & Design Code SPD.</p>	B.02.A to be removed, but B.01.B and other similar design codes to be retained, with no proposed change.
177	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	5.3 Built Form	<p>B.06.A seeks to avoid parking at upper levels facing the public realm/public highways. It may be relevant for a co-location or residential-led development. However, we consider that it is not an appropriate basis for SIL intensification. An element of parking or servicing facing the perimeter of a multi-storey employment scheme may be unavoidable, whilst also presenting opportunities for high quality design.</p>	Noted.	B.06.A to be removed.
178	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	5.3 Built Form	<p>B.07.A states: <i>“Building uses should be expressed through distinct yet complimentary architectural languages.”</i></p> <p>We consider that this formulation is too vague and fails to provide the level of detail that would normally be expected from a design code. It should be deleted. It may be more suited to a design guide than a design code. As set out in the National Model Design Code, design guides differ from design codes <i>“in being less precise and specific in [their] content... and more open to interpretation”</i>.</p>	Noted.	B.07.A to be removed.
179	Turley (on behalf of	5.3 Built Form	<p>Regarding the diagram on page 57, the reference to ‘Urban Boulevard’ should be deleted. This phrase does not accord with the</p>	Noted.	Figure 5 and I.14.C to be removed.

	Goodman, owner of Staples Corner Business Park)		otherwise strategic function of the North Circular. Also, it is not consistent with the other content in the Design Code, with the only other reference being in relation to ‘the Broadway’ on Page 91 (I.14.C).		
180	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	5.4 Identity	<p>We agree with the Council that the Masterplan presents an opportunity to establish a distinctive identity for Staples Corner. However, the identity-related aspirations set out in Section 5.6 are too vague.</p> <p>Our principal concern is the lack of clarity as to how the design coding will be applied to proposals for new development. For example, I.03.A establishes that: “[t]he buildings and public realm at Staples Corner must have a cohesive industrial character and materiality that give the area a clear and recognisable identity.”</p> <p>However, the accompanying illustration at Figure 6 does not specify precisely which buildings and areas of public realm this requirement will apply to or how the highlighted areas should influence new design. The figure is similarly unclear in its illustration of how the other identity-related requirements set out on Page 58 will be applied.</p> <p>In light of the above, this section of the document should be revisited once the Masterplan SPD has been adopted. Once the Masterplan has established the broad development principles for the area, it should be more possible to specify how a consistent architectural language or materiality could contribute towards a distinctive identity for Staples Corner. Alternatively, the Design Code may specify a range of materials or architectural features (taking into account operational and viability aspects) to ensure a distinctive identity is delivered across the area.</p> <p>At present, some codes are too vague to provide a meaningful framework for future planning applications, or require further design guidance (which should be the role of the Design Code).</p>	<p>The next iteration of the Design Code will focus on streetscape and character, and some place-focussed design codes relating to ‘Identity’ will be retained and/or updated. Other relevant design codes will be added to give greater detail on other aspects of character e.g. materiality, building typology etc supported by additional illustrations.</p> <p>Again, as set out in paras 4.1.2 to 4.1.5, this Design Code was consulted on in advance of the masterplan as a ‘moment in time’ to help shape the masterplan’s ongoing development and provide a relative degree of certainty to potential applicants.</p>	5.4 to be replaced with street-focussed design codes developed for each individual street.
181	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	5.6 Resources	<p>While many of these aspirations are shared by our client, we are concerned that some of the design coding risks stifling the intensification and “<i>transformational change</i>” sought for the area by the Local Plan. For instance, R.07A states that: “<i>Reuse, adaptation and retrofitting should be prioritised as a first approach to any and all development proposals.</i>” Similarly, R.11A states: “<i>Existing unique or distinct industrial features should be preserved and enhanced to highlight their importance and value in defining the character of the area.</i>”</p> <p>This design coding may be relevant to residential proposals involving smaller sites or those of particular significance in architectural and heritage terms. However, it would be inappropriate to apply such requirements to sites proposed for significant SIL intensification. The development of new units with larger floorplates, multiple levels and more efficient site layouts should be encouraged within SIL to meet the established policy aims. Many older industrial and logistics units are inefficient in design terms and cannot be easily re-used, retrofitted or repurposed. In addition, many older units do not meet the latest sustainability and energy efficiency objectives. Redevelopment presents an opportunity for a far more sustainable outcome and delivers employment floorspace which can easily adapt</p>	<p>Noted – commentary on sustainability, achieving net zero, and the approach to reuse, adaptation and retrofitting (as well as other associated matters) will be covered in the relevant spatial strategy in the emerging Masterplan & Design Code SPD.</p>	5.6 to be removed.

			<p>to ‘changes in economic circumstances’, as per the NPPF, and occupier requirements.</p> <p>Therefore Section 5.6 should be revised to ensure that its approach to resources better supports the established vision for SIL intensification and “<i>transformational change</i>” at Staples Corner.</p>		
182	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	5.7 Lifespan	<p>For the avoidance of doubt, the Design Code should make clear that various aspects of this section are only applicable to co-location or residential-led elements of the Masterplan (i.e. L.05.A-07.A).</p> <p>In addition, internal estate roads and circulation areas within larger industrial and logistics sites should be excluded from L.03.A, to ensure that employment sites can continue to operate in an environment which is safe for all users.</p>	Noted.	5.7 to be removed.
183	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	6.1 North Circular Road	<p>Seeks to guide the enhancement of the North Circular Road.</p> <p>However, the associated design coding is too simplistic and prescriptive to be deliverable, especially given the significant complexity and strategic importance of the North Circular Road.</p> <p>London Plan Policy T7 is clear that development proposals should not cause unacceptable impacts on London’s strategic road networks. To ensure that this is the case in relation to interventions along the North Circular Road corridor, extensive technical feasibility analysis would be required. Including input from multiple stakeholders (TfL, Landowners, LB Brent, GLA).</p> <p>This section of the Design Code should be deleted, or re-worded to comprise a much broader, less-prescriptive set of objectives. Detailed proposals for the enhancement of the North Circular Road can then be addressed through the development management process, in consultation with the necessary stakeholders and informed by thorough technical analysis.</p> <p>As drafted, B.01.B would have particularly adverse impacts for the delivery of employment-generating floorspace in the SIL. It would reduce developable areas, impacting the efficient use of brownfield land, and resulting in a lower employment density. The relationship between building lines and the North Circular Road should be developed and tested at planning application stage and needs to be balanced against other policy objectives and operational requirements.</p>	<p>To ensure it meets DLUHC expectations that design codes are practical, legible and enforceable, this Design Code will need to balance allowing flexibility against giving certainty to developers and other stakeholders, including the council itself. Where possible, this Design Code sets out specific and quantitative requirements to give that certainty.</p> <p>For example, B.01.B requires a minimum setback of 7.5 metres to both sides of the North Circular Road. Whilst this is based on the prevailing building lines in the area, it is acknowledged this will not be achievable on every site, particularly smaller sites. However, the aspiration would be for smaller sites to be parcelled together to form larger and more viable development opportunities – commentary on land assembly and approaches to delivery will be covered in the relevant section of the emerging Masterplan & Design Code SPD.</p> <p>It is worth noting however, that B.01.B and other similar design codes are intended as a baseline requirement and a starting point for discussions as part of the development management process. All schemes will be assessed on a case-by-case basis and failure to comply with a specific design code or codes will not necessarily equate to a refusal.</p>	No proposed change.
184	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	6.1 North Circular Road	Figure 11, which illustrates the North Circular Road “ <i>as it might be</i> ”, is also unhelpful in visioning the future potential of this strategic corridor. It appears to show the North Circular Road fronted by residential developments of one to three storeys in height. This form of development would not be in keeping with the intensification and “ <i>transformational change</i> ” envisaged for the area and does not reflect the SIL designation. Figure 11 should be deleted.	As set out in para 4.1.2, in lieu of the masterplan matters relating to land use have been left deliberately vague, though Figure 11 is not intended to show residential uses along the North Circular Road. As this Design Code is developed and integrated into the emerging Masterplan & Design Code SPD, Figure 11 will be updated to give greater clarity.	Figure 11 to be updated.
185	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	6.1 North Circular Road	The above comments also apply to the comparable design coding and illustrative figures for Edgware Road set out on Pages 70-71 of the Design Code, and the servicing requirements for Staples Cross set out in M.02.C on Page 84.	As above (see 183).	<p>Figures 12 and 13 to be retained.</p> <p>M.02.C to be updated with street-focussed design codes developed for each individual street.</p>

186	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	7.1 Staples Cross	<p>While we are broadly supportive of the principles, we consider that this section would provide a stronger framework for future development if the balance between prescription and flexibility were updated. In addition, it should also recognise and be explicit about the potential of Staples Cross to provide employment-led intensification.</p> <p>Figure 22 'Opportunities Plan' provides the locations of potential place-based interventions within Staples Cross. However, assigning particular locations to certain interventions, such as the siting of public art, is too prescriptive at this stage in the regeneration process. In many cases, only when detailed designs have been formulated through the development management process will it become clear whether it is feasible or appropriate to realise the interventions identified in Figure 22. To that end, we recommend that Figure 22 should either be removed or its suggested locations clearly identified as indicative and subject to further feasibility design work. The same applies to Figure 23.</p>	Noted.	7.1 to be removed.
187	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	7.1 Staples Cross	<p>The following page of the Design Code sets out all thirteen place-based opportunities in full. The sixth opportunity, which falls under the 'Harmony and Balance' heading, notes that development proposals in this area can potentially secure activity across three levels, addressing in turn the street, the Edgware Road flyover, and the North Circular Road flyover. We are concerned that the present wording could be misinterpreted as capping the number of storeys that would be acceptable in this location. In addition, there is scope to reference the type of intensified commercial development that the London Plan and Local Plan seek to achieve. Accordingly, we suggest the following amendment:</p> <p><i>“Activity on three levels Intensified commercial activity through multi-storey/multi-level development addressing street level, the Edgware Road flyover and the North Circular Road flyover.”</i></p>	Noted.	7.1 to be removed.
188	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	7.1 Staples Cross	<p>R.01.C states that: <i>“Development proposals incorporating commercial uses should refer and respond to the LETI Climate Emergency Design Guide.”</i></p> <p>Goodman has an established a record of delivering highly sustainable commercial developments, including within London, and recognises that proposals for large-scale, employment-led development present significant opportunities to deliver lasting improvements in terms of energy efficiency and sustainability. In light of this experience, we recommend that R.01.C should be replaced with design coding that is more closely aligned with planning policy and the types of development found within Staples Cross.</p> <p>The key issue with R.01.C is that the LETI Climate Emergency Design Guide has no formal status in planning terms or policies. In addition, it focusses on development typologies that are not found within SIL (i.e. Small Housing, Medium Housing, Schools, and Commercial Offices). Therefore, it has limited direct relevance to the Staples Corner SIL. Accordingly, R.01.C should be amended, as follows:</p> <p><i>“Development proposals incorporating commercial uses should must refer and respond to the LETI Climate Emergency Design Guide sustainability, energy and climate-related policies of the adopted Development Plan.”</i></p>	Noted – commentary on sustainability and achieving net zero will be covered under 'Sustainability & Energy' in the emerging Masterplan & Design Code SPD.	7.1 to be removed.

189	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	7.1 Staples Cross	<p>Finally, we note that the design coding (e.g. M.08.C and) and Opportunities (e.g. Opportunity 11) require development proposals to deliver “connections” with, or “responses” to, their surrounding context without elaborating on the form that these should take. Where, for example, a “Connection to Brent Cross Town” is proposed (Opportunity 11), the Design Code should make clear the nature of the connection that is envisaged. Similarly, where the design coding appears to require development proposals to support specific highways improvements (e.g. M.08.C), it should clarify the intended locations of these improvements. These changes would ensure that the Design Code is better able to guide the delivery of new development and contribute to the creation of an improved sense of place at Staples Cross.</p>	<p>M.08.C sets out an aspiration for an at grade crossing at ‘Staples Cross’ – this is strategically important for the movement network and a recurring issue arising from engagement, but it is not considered possible for this Design Code to provide additional detail without further discussions with TfL.</p> <p>B.04.C sets out the need for building heights to respond to bird flight paths. It could be required for development proposals to demonstrate this has been taken into consideration given the proximity of the Brent Reservoir, however further detail will be set out in the relevant spatial strategy in the emerging Masterplan & Design Code SPD.</p>	<p>M.08.C to be removed – commentary on the provision of a new at grade crossing to the NCR will be covered under ‘Infrastructure Projects’ in the emerging Masterplan & Design Code SPD.</p> <p>B.04.C to be removed.</p>
190	Turley (on behalf of Goodman, owner of Staples Corner Business Park)	7.2 The Broadway	<p>Sets out the Vision Statement for the Broadway Area. The Vision Statement states that the Broadway “<i>is envisioned as a high-density, mixed-use, tree-lined boulevard stitching the boundary between Staples Corner and Brent Cross together, and linking West Hendon to the north and Cricklewood to the south.</i>”</p> <p>Figure 24 (Page 88) and Bullet 8 (Page 89) suggest that high-density, mixed-use (i.e. residential) development may be delivered adjacent to the Goodman Site. As noted above, we do not consider this to be a suitable location for high-density mixed-use or residential-led development. The introduction of sensitive residential uses in this location would compromise both the existing operation of the Goodman Site and its future regeneration.</p> <p>Therefore, we object to the claim that the area shown on Figure 24 presents an “[o]pportunity for high density, mixed-use development,” as described in Bullet 8.</p> <p>Bullet 8 and Figure 24 should be amended as follows: “Opportunity for high-density, mixed-use employment-led development and intensification of existing SIL.” These changes will ensure that this element of the Design Code accords with key London Plan and Local Plan requirements in relation to the Staples Corner SIL.</p>	<p>Figure 24 has been misinterpreted – commentary on land use zoning will be covered under ‘Land Use and Zoning’ in the emerging Masterplan & Design Code SPD.</p>	<p>7.2 to be removed.</p>
191	The Woodland Trust	General	<p>What is your relationship to the Staples Corner area?</p> <ul style="list-style-type: none"> • None of the above <p>Are you generally supportive of the Staples Corner Design Code?</p> <ul style="list-style-type: none"> • Yes <p>Please explain what, if anything, you like about the Design Code:</p> <ul style="list-style-type: none"> • Section 5.2 on Nature, particularly the protection of existing trees, requirement for new street trees and integration of trees into SuDS. <p>Please explain what, if anything, you do not like about the Design Code?</p> <ul style="list-style-type: none"> • Could benefit from setting an area-wide target for tree canopy cover, and recommendations on suitable native broad leaf tree species. 	<p>Noted – this matter was explored during the development of this Design Code and has been reviewed as it is developed and integrated with the emerging Masterplan & Design Code SPD.</p> <p>LB Brent is looking to develop a borough-wide approach to tree canopy cover as part of its emerging Tree Strategy and will not be including any requirements specific to Staples Corner Growth Area.</p>	<p>No proposed change.</p>