



**Cabinet**  
12 November 2024

**Report from the Corporate Director of Neighbourhoods & Regeneration**

**Lead Member – Leader & Cabinet Member for Housing, Regeneration, Planning & Growth  
(Councillor Muhammed Butt)**

**Staples Corner Growth Area Masterplan & Design Code Supplementary Planning Document**

<b>Wards Affected:</b>	Dollis Hill
<b>Key or Non-Key Decision:</b>	Key
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>No. of Appendices:</b>	Three Appendix 1: Weblink to the SCGA Masterplan SPD: <a href="https://acrobat.adobe.com/id/urn:aaid:sc:va6c2:2e5f53c1-209c-4c57-9101-4c89f80094d4">https://acrobat.adobe.com/id/urn:aaid:sc:va6c2:2e5f53c1-209c-4c57-9101-4c89f80094d4</a> Appendix 2: Statement of Consultation Appendix 3: Equality Analysis
<b>Background Papers:</b>	None
<b>Contact Officer(s):</b> (Name, Title, Contact Details)	Gerry Ansell, Director Inclusive Regeneration & Employment 020 8937 6477 <a href="mailto:Gerry.Ansell@brent.gov.uk">Gerry.Ansell@brent.gov.uk</a>  Jonathan Kay, Head of Regeneration 020 8937 2348 <a href="mailto:Jonathan.Kay@brent.gov.uk">Jonathan.Kay@brent.gov.uk</a>  Paul Lewin, Spatial Planning Manager 020 8937 6710 <a href="mailto:Paul.Lewin@brent.gov.uk">Paul.Lewin@brent.gov.uk</a>

## **1.0 Executive Summary**

- 1.1 Brent Council Cabinet 28 May 2024 approved the draft Staples Corner Growth Area Masterplan and Design Code Supplementary Planning Document (SCGA Masterplan SPD) for publication and statutory consultation. This report sets out the consultation feedback, officer consideration and recommended changes to the document. It is recommended Cabinet approve the Staples Corner Growth Area Masterplan and Design Code Supplementary Planning Document for adoption.
- 1.2 Members are asked to note that this report has been circulated as “To Follow” due to the need to finalise what represents an extensive set of documents with the need for approval being sought by Cabinet in November as part of the Council’s Local Plan commitment to deliver a Masterplan for Staples Corner.

## **2.0 Recommendations**

- 2.1 Cabinet to consider the consultation feedback, officer consideration and recommended changes to the Staples Corner Growth Area Masterplan and Design Code Supplementary Planning Document.
- 2.2 Cabinet to approve the Staples Corner Growth Area Masterplan and Design Code Supplementary Planning Document for adoption, subject to any de minimus and non-substantial edits to the document.

## **3.0 Detail**

### **3.1 Cabinet Member Foreword**

- 3.1.1 The Staples Corner Masterplan delivers on our Local Plan commitment for regeneration and growth and sets an ambitious vision to create a higher quality and intensified industrial area sitting adjacent to a new urban community. Regeneration and growth will support a rich ecology of industrial and co-located residential uses to create an exemplary 15-minute city where people live, work and interact. Intensification will deliver a new and varied supply of modern industrial premises for London’s strategic and local business needs, as well as commercial space, social infrastructure and an improved public realm to support a new mixed use residential community.
- 3.1.2 This SCGA Masterplan SPD sets the framework to facilitate the delivery of high-quality homes, attract investment for more business opportunities and jobs, all supported by new infrastructure and community facilities. Business growth will strengthen the area’s existing economy and provide space for emerging sectors, including logistics, light industrial units and workspaces. By 2041, Staples Corner will deliver at least 2,200 new homes co-located alongside new

and refurbished industrial premises in a way that supports the transition to a net zero carbon circular economy and the challenges of climate change.

3.1.3 Brent Cross West station has improved Staples Corner public transport connectivity into central London and beyond. Planned West London Orbital services will further improve connections and cut journey times around West London, providing future residents and workers greater choice and convenience. The council will work with landowners, developers, residents, businesses and other stakeholders to bring forward change to realise the area's massive potential.

### 3.1.4 **Contribution to Borough Plan Priorities & Strategic Context**

3.1.5 The SCGA Masterplan SPD addresses the following Borough Plan Priorities.

- Strategic Priority 1 - Prosperity and Stability in Brent. Through the preparation of a SCGA Masterplan SPD, the Council provides a framework to support the business community to grow, ensure the provision of secure local well-paid jobs and delivering accessible and genuinely affordable housing.
- Strategic Priority 2 - A Cleaner, Greener Future. The SCGA Masterplan SPD seeks to ensure sustainability is central to the growth of our borough and local economy. This is further discussed in Section 8.0.
- Strategic Priority 3 – Thriving Communities. The preparation of the SCGA Masterplan SPD is informed by engagement with stakeholders, local residents and communities, businesses and landowners. This has been ongoing for the past two years, most recently with the six week statutory consultation period 4 June to 16 July 2024.

## 3.2 **Background**

3.2.1 Brent's Local Plan (2019-2041) was adopted in February 2022. The Plan sets out the vision and policies for development in the borough for the next 10 years, which includes the delivery of 23,250 new homes from 2019/20 to 2028/29. Key to accommodating an increasing population are eight growth areas, viewed as the most sustainable spatial expression for growth, exploiting brownfield land, good access to public transport and higher densities to deliver the majority of new homes alongside regeneration benefits and infrastructure.

3.2.2 The Staples Corner Growth Area (SCGA) extends to 43 hectares of brownfield land that accommodates light industrial, heavier industrial and distribution uses, plus other uses such as wholesale and trade counter in a mixture of old and more modern premises of varying heights and quality. It is bounded on the north by the Welsh Harp / Brent Reservoir and Neasden Recreation Ground open spaces. To the east is the A5 Edgware Road, beyond that warehousing and the Brent Cross Opportunity Area in London Borough of Barnet. Brent Cross West station recently opened which has improved the transport connectivity of Staples Corner. The Local Plan allocates Staples Corner as a "Growth Area -

Strategic Industrial Location subject to co-location and intensification”. The plan states that in addition to around 2,200 homes, the area will through industrial intensification together with co-location of residential and industrial uses provide a major boost to business and employment opportunities through increased floorspace. Staples Corner has the potential to deliver a new varied supply of modern industrial premises, studios and managed workspaces to meet London’s strategic and local business needs, as well as new commercial space and social infrastructure to support a mixed use residential community.

- 3.2.3 The SCGA Masterplan SPD is a long-term, ambitious and comprehensive plan that will help to secure at least 2,200 new homes, as well as new infrastructure to help maximise opportunities and wellbeing for local residents, businesses and communities. The document identifies how the majority of the industrial land will be protected and intensified solely for industrial purposes but allowing some either for a mix of uses incorporating some industrial or for residential led development. Importantly, the SCGA Masterplan SPD is not a fixed masterplan because different acceptable scenarios dependent upon design and delivery approaches could be equally or more successful in fulfilling policy objectives.
- 3.2.4 To support the SCGA Masterplan SPD, transport consultants Steer were commissioned in November 2023 to undertake a Transport Study to consider transport impacts on the strategic and local road network. The Steer Transport study assumptions were informed by a series of discussions with LB Brent Highways, TfL and National Highways. The Steer study highlights that, were the redevelopment to be fully built out, traffic flows on Staples Corner will increase to a level that is likely to impact the performance of the M1//A406 junction. The study in response proposes a series of mitigations, which have been included into the SCGA Masterplan SPD and require consideration for relevant proposals. The study has been circulated to key stakeholders National Highways, TfL and LB Barnet. It is noted that under a Statement of Common Ground (SoCG) between LB Brent and National Highways (formerly Highways England), agreed in advance of LB Brent Local Plan adoption in 2022, LB Brent agreed to engage National Highways and TfL to assess the impacts from Staples Corner redevelopment on the strategic road network, in advance of adoption of the SCGA Masterplan SPD. Comments received from National Highways, LB Barnet and TfL in response to the Steer Study are discussed in paragraphs 3.3.33 to 3.3.36 below.

## **Consultation**

### *Pre- Statutory Consultation*

- 3.3.1 Early consultation with local residents, businesses and communities in Staples Corner over 2022 and 2023 to inform development of the draft SCGA Masterplan SPD included:
- Business Survey
  - Residents Survey
  - Landowner / Leaseholder Engagement
  - Stakeholder Engagement
  - Splash Workshops

- 3.3.2 Feedback indicated broad support for the drafted plan and an appetite for change but also highlighted that the SCGA SPD would present an opportunity to tackle key issues in the area i.e. deprivation, crime, lack of access to green spaces and affordable housing.

#### *Statutory Consultation*

- 3.3.3 The SCGA Masterplan SPD was subject to 6 weeks of formal consultation from 4 June 2024 to 16 July 2024. This was in accordance with the Regulations and the Council's Statement of Community Consultation (SCI). Statutory public consultation provided further opportunities for engagement with partners, stakeholders, local residents, businesses and communities.
- 3.3.4 Information about the SCGA Masterplan SPD consultation received 6,771 hits via the Council's social media and there were 852 hits to the dedicated SCGA website. Details for the statutory consultation process were publicised on social media channels including Facebook, Instagram, LinkedIn Nextdoor and X. Paper copies of the SCGA Masterplan SPD were made available at Ealing Road, Harlesden, Kilburn, Kingsbury, Wembley and Willesden libraries. 9,131 GovMail letters were sent to all properties within the Dollis Hill ward notifying of the statutory consultation period as well as details of the drop in events. This included letters to residents, businesses and local groups (i.e. all properties in the ward with a postal address). Nine consultation drop-in sessions were held in and around the SCGA to listen and answer concerns and queries regarding the draft Masterplan SPD. A wide range of stakeholders including individual residents, local organisations, councillors, statutory consultees, landowners and developers, and other interested parties identified on the planning policy contacts database were notified of the consultation.
- 3.3.5 178 people, including residents and other stakeholders, attended the nine consultation events and engaged in dedicated one-to-one discussions with officers. 151 people completed the surveys available in our events and online via our consultation portal. 21 people/organisations issued formal consultation responses. In total, 172 responses were received to the Draft SCGA SPD during the statutory consultation period.

#### *Consultation Responses – Summary*

- 3.3.6 172 responses were received on the Draft SCGA Masterplan SPD during the 6-week consultation period. 151 people completed the survey, and the table below details the majority percentage of people that supported the proposed plans and the more limited percentage of people that were not supportive:

Survey totals	Vision	Challenges	Opportunities	Masterplan	Design Code
Supportive	82%	77%	83%	72%	74%
Not supportive	11%	13%	7%	16%	11%
No response	1%	1%	5%	6%	8%
Not sure	6%	9%	5%	6%	7%
Totals	100%	100%	100%	100%	100%

Whilst responses are broadly positive and supportive of the overarching vision for regeneration set out in the draft SCGA Masterplan SPD, consultation responses included specific questions and concerns, mainly in relation to the topics below.

*Key topics of concern*

- 3.3.7 Housing, particularly affordable housing delivery: it was felt that more housing, particularly affordable housing is needed and should be available for local residents in need of more suitable accommodation. The SCGA Masterplan SPD has factored in provision for housing and includes provision for 3,066 homes and follows the council's policy that a minimum 35%, and where viable 50%, of new homes should be affordable, with a tenure split of 70% Social Rent/London Affordable Rent and 30% Intermediate Housing.
- 3.3.8 Safety and poor environmental quality concerns of the area: These concerns are noted as challenges in the document. Investment in the physical infrastructure and an improved public realm will be essential to the growth of the area. Design Code Chapters 6 to 8 illustrate the design requirements for new developments coming forward in the SCGA and promote high quality and successful design. Developments are expected to provide passive surveillance and street lighting which help guard against anti-social behaviour.
- 3.3.9 Request for more local services such as culture, schools, shops, doctors' surgeries and dentists: The Local Plan does not identify the need for additional school provision in the area, but this is regularly reviewed as part of Brent Council's statutory responsibility for school place planning. Provision for retail, other local amenities and community use have been factored into and included within the SCGA Masterplan SPD, with Section 9.6 Social Infrastructure detailing the requirements for such community facilities. S106 and Community Infrastructure Levy (see para. 5.6) are mechanisms that further will support additional needs as planning application come forward. The Integrated Neighbourhood Team have not highlighted any immediate need for doctor or

dentist provision, but new community spaces could be made available for that purpose should this future need arise.

- 3.3.10 Density and building heights proposed: The whole of the Growth Area falls within Brent's Tall Building Zone. The SCGA Masterplan SPD has determined that the tallest buildings are appropriate in the areas adjacent to the emerging Brent Cross West development, particularly along the Edgware Road close to Brent Cross West Station and Brent Cross Town, where the public transport accessibility level is the highest. At the same time building heights should respond sensitively to the suburban, low density streets to the south and the Brent Reservoir. Tall buildings are required to provide high-quality mixed-use environments that will add quality to Staples Corner's character and sense of place. The SCGA SPD requires that tall buildings must not create a 'canyon effect' in order to prevent extreme wind conditions at ground level. Townscape and Visual Impact Assessments will be required for schemes coming forward to test the impact of tall buildings in more detail.
- 3.3.11 More facilities needed for young people such as play space: The SCGA Masterplan SPD includes provision for a series of new open spaces and pocket parks as well as improving access to existing park spaces such as the Welsh Harp and Clitterhouse Playing Fields. This includes provision for a large open space along the Edgware Road. Individual residential developments will be required to make children's play space provision in line with London Plan and Local Plan policies.
- 3.3.12 Increase in traffic and parking congestion: London Plan and Brent Local Plan policies already encourage accessibility by active travel and public transport modes and the use of parking restraint measures will discourage car use. Industrial uses will however need to maintain vehicle use essential to their operation, with the SCGA Masterplan SPD encouraging the use of e-vehicles and consideration of opportunities for the consolidation of servicing and deliveries, with last mile delivery by more sustainable modes. Residential uses will be required to be car free except for wheelchair provision. Controlled Parking Zones will likely be needed for surrounding residential streets, the cost of introducing which will be the subject of developer contributions secured as part of the planning process.
- 3.3.13 Better connection to public transport: It was stated that better infrastructure should be provided, particularly to link to Brent Cross West Station. The SCGA Masterplan SPD sets out key infrastructure projects, including the provision of a new at grade Edgware Road pedestrian and cycle crossing to directly link to Brent Cross West Station. The council will seek to secure S106 contributions and Community Infrastructure Levy as part of the planning process to contribute towards delivery.
- 3.3.14 Impacts on residential amenity, i.e. loss of light, wind conditions, overlooking, noise: Concerns about potential impacts on residential amenity are noted. More detailed design development will be required to consider these issues as on a case-by-case basis as schemes are developed, and must include daylighting, sunlight, microclimate, overlooking as well as noise assessments.

The requirement for undertaking these detailed assessments is included in the SCGA Masterplan SPD.

- 3.3.15 Student accommodation not supported: There are concerns that this specific type of accommodation will replace conventional housing delivery. Whilst the SCGA Masterplan SPD does not mention any requirement for student accommodation it is acknowledged that Sheffield Hallam University Campus is planned to open in Autumn 2026 in Brent Cross. Consequently it is quite possible there will be demand for some student accommodation within and around the Staples Corner area. Policies already exist within the Local Plan (Policy BH7) and London Plan (Policy H15) to provide the basis for determining the acceptability of such proposals should they come forward.
- 3.3.16 Impact on flooding: The principle fluvial flood risk runs along the course of the River Brent and around the Brent Reservoir, which falls within the 1 in 100 year fluvial flood zone. Wider parts of the area such as the Staples Corner roundabout and the Edgware Road have a lower probability of flooding but do have some risk. Surface water flooding mainly appears on the north-east, north-west and south of the SCGA and where significant road level changes appear on Oxgate Lane and Coles Green Road. To mitigate against flooding, urban greening and sustainable drainage solutions form part of the SCGA SPD, with detailed guidance provided in Chapter 9.5 Environmental Sustainability. Design Code N.03 further requires development proposals to integrate water management, sustainable drainage systems and flooding mitigation.
- 3.3.17 Impact on the Welsh Harp i.e. breeding birds and dominating buildings: The SCGA Masterplan SPD has sought to limit heights and building proximity along the more sensitive northern edge of the Growth Area where it meets the Welsh Harp. Design Code N.01 requires that existing green and blue assets, and wildlife habits including native established vegetation must be protected as a minimum and enhanced where possible. Ecological surveys and protected species surveys will be required to accompany planning applications where the development has the potential to affect designated environmentally important sites or where there is a reasonable likelihood of protected species being present.
- 3.3.18 Poor quality architecture is shown in the document: Design Code Chapters 7 & 8 of the SCGA Masterplan SPD seek to enhance the character of the area and improve architectural quality and successful design, through the use of Design Codes. 3D visualisations have been included within the document and illustrate the form and massing of the future development, on an indicative basis. Design Code I.01 requires development proposals to respond to the industrial heritage and character of the area.
- 3.3.19 Support for small to medium enterprises: Developers will be required to explore relocation options and propose and implement a business decant and relocation strategy as part of any planning application. The Local Plan requires 10% of new employment floorspace within the SCGA as affordable workspace.



3.3.20 Delivery challenges given land fragmentation: The SCGA Masterplan SPD proposes a phased approach to redevelopment given the 200+ landowners in the area and has sought to identify larger opportunities and consolidate sites. Section 10 of the SCGA Masterplan SPD sets out a delivery strategy and indicative phasing.

*Key concerns from Statutory Consultees on the SCGA Masterplan SPD*

3.3.21 Statutory consultees responded on their areas of responsibilities with replies received from National Highways, Transport for London, the Greater London Authority, LB Barnet, Historic England, the Canal and River Trust and the Environment Agency.

3.3.22 National Highways (NH): NH welcomed the vision and objectives of the Masterplan and Design Code SPD to work towards sustainable redevelopment. NH commented that there are no impacts for the Strategic Road Network arising from the design code chapters. However, NH noted separate discussions with officers on the Transport Study that accompanies the SCGA Masterplan SPD and that whilst NH welcome the policies and strategies set out in the SPD document, their comments do not apply to the SCGA Transport Study. This matter is further discussed in paragraphs 3.3.33 to 3.3.36 below.

3.3.23 Transport for London: (TfL): TfL made it clear that they are unable to commit to funding infrastructure improvements and that any new proposals for infrastructure would need to be discussed with the appropriate TfL departments, including the proposal for a new pedestrian and cycle crossing over the A5 Edgware Road to create direct route to Brent Cross West Station. TfL made a number of comments on the maps within the document and these have been corrected and clarified. A reference has been added in relation to developer contributions being used towards the West London Orbital, to address their comment in this regard. TfL further made a number of comments on the proposals to create new cycling infrastructure and the aspirational street sections included within the document. Clearer labelling and caveats have been added to clarify that the aspirational sections for all streets are an indicative way of reallocating space and do not represent final proposals.

3.3.24 Greater London Authority (GLA) stated that on balance, the Mayor is satisfied with the SCGA Masterplan SPD and agrees the document, subject to modifications. The modifications requested are not felt to be significant and relate to design changes reinforcing the intensified industrial nature of the SCGA Masterplan SPD. In response, reference has been included to 24-hour, 7-days-a-week industrial operations and a requirement that London Plan (2021) Policy D13 (Agent of Change) is a consideration in determining relevant planning applications, in the context of new residential uses near intensified industrial activity, so the area continues to function and prosper as an industrial area. Guidance has been added to require service yards to be designed to be sufficient for the intensified industrial floorspace, limit any impact on the highway, and be attractive to a broad range of occupiers. Design Code amendments have been made to ensure landscaping in industrial areas is robust to withstand heavy goods vehicles and is designed to help reduce air

pollution for future residents. It is felt that the GLA's comments have been responded to with changes made to the document as described.

3.3.25 LB Barnet: LB Barnet commented that there is a need to take a comprehensive and holistic approach to the character of development along the Edgware Road and to secure the infrastructure necessary to support the level of planned growth as well as achieve good place-making. Regular meetings over the past two years have taken place with LB Barnet to ensure cross-borough co-ordination and these will continue as development proposals come forward, to ensure that masterplanning for the two areas is coherent in terms of proposed development and the delivery of supporting infrastructure.

3.3.26 Historic England (HE): HE submitted detailed comments on the extent to which the historic baseline had been mapped, considered and taken into account in the development of the SCGA Masterplan SPD. HE noted that the SCGA Masterplan SPD proposes that the following buildings would be lost: The locally listed Oxgate Admiralty Citadel, Victoria Works, Sayer House, part of the Atlas Business Centre and China House. HE also queried the tall buildings proposed in the SCGA Masterplan SPD which are up to 31 storeys and exceeds heights of Brent's Tall Building Strategy 2020.

3.3.27 Changes have been made to positively address HE's comments. In a new Section 2.3 Historic Baseline, a new map includes relevant historic and heritage features. Whilst there are buildings of notable architectural language and character in the area, only Oxgate Farm is a designated heritage asset, and this sits outside the Growth Area boundary. The Ox & Gate public house is considered to be a non-designated heritage asset, but again it sits outside the Growth Area boundary. Any development proposals on neighbouring sites would need to be assessed on their own merits. In terms of the Oxgate Admiralty Citadel, this site is subject to a live planning application (ref 20/4143) and heritage will be considered in the planning balance as part of the determination process. Whilst the retention of Victoria Works, Sayer House, Atlas Business Centre and China House is encouraged due to their contribution to the character of the area, their significance is not such that this is an absolute requirement. As mitigation, Design Code R.03 clearly states that, "Opportunities for reuse, adaptation and retrofitting must be explored as a first approach to any and all development proposals" and is considered sufficient.

3.3.28 In addition, specific references to Heritage have been included within the Vision and Opportunities sections of the document. Additional wording has been included in the accompanying Strategic Environmental Assessment Screening Statement, to clarify the approach taken in respect to tall buildings, with the Brent Tall Building Strategy 2020 now superseded by the masterplanning which has established suitable development forms and heights.

3.3.29 The Canal and Rivers Trust: (CRT): The CRT asked for reference to the Canal & River Trust within the document, as the owners of the Brent Reservoir. CRT also requested that developers of sites close to the reservoir be encouraged to discuss their proposals with the Trust at the earliest design stage. Additional paragraphs have been included in the SCGA Masterplan SPD in response.

Further paragraphs have been added to address their specific issues relating to environmental sustainability and water use.

3.3.30 Environment Agency (EA): The EA highlighted the need to provide a stronger focus on reducing flood risk and sustainable drainage. The SCGA Masterplan SPD has been amended to improve the document in this regard.

3.3.31 The remaining part of statutory consultees were broadly supportive of the plans. Suggestions were made to improve the document and when possible/required amendments were made. It is felt that the changes have positively enhanced the document. The full detailed response can be found within Appendix 2.

*Key concerns from Landowners and Developers on the SCGA Masterplan SPD*

3.3.32 In summary, the landowners and developers provided in principle support for the SCGA Masterplan SPD and agreed with the Vision and Objectives. Some concerns related to the provision of infrastructure requirements and density on individual sites. Where more specific issues have been highlighted, it is recommended detailed discussions take place with landowners and developers per Brent's pre application service. Some of the landowners have recently mobilised design teams and have begun developing proposals for their sites since publication of the draft document.

*Key concerns from Statutory Consultees on the SCGA Transport Study*

3.3.33 Per paragraph 3.2.4 above, transport consultants Steer were commissioned in November 2023 to undertake a Transport Study to consider transport impacts on the strategic and local road network. National Highways and LB Barnet comments in response to the SCGA Transport Study propose, amongst other matters, carrying out a new additional standalone assessment of the M1/A406 junction, based on the existing road layout, because there is uncertainty that the consented but not yet constructed new Staples Corner junction scheme (in LB Barnet) which is assumed in the current model will actually go ahead. This approved junction scheme is however in the current TfL LOHAM (London Highway Assessment Model) as a committed scheme, and the assumption to include it in the Steer model was agreed with both TfL and National Highways. Steer have acted in accordance with best practice and on the best available information by taking it into account in the study. It is noted that a traffic model based on the existing road layout, being asked for by National Highways and LB Barnet does not currently exist, as it is not best practice to remove a scheme that is consented and is part of the TfL model.

3.3.34 In response to the concerns raised by National Highways and LB Barnet, a new transport section (section 9.7 Transport Mitigation) has been included in the SCGA Masterplan SPD that details the mitigations for increased traffic flows that are likely to impact the M1/A406 junction, as well as LB Brent's commitment to continue to engage National Highways and LB Barnet regarding plans for the M1/A406 junction, and any fair, reasonable and proportionate mitigations from redevelopment at Staples Corner. The SCGA Masterplan SPD will also likely be reviewed after 5 years, and such review could be brought forward were

National Highways and LB Barnet to agree a new approach for the M1/A406 junction.

3.3.35 TfL comment that there remains a chance that the M1/A406 junction upgrade will be delivered as part of the current consented scheme and that should revised designs for the junction emerge, recommend that a strategic approach is taken with all relevant stakeholders working together, and that any developments impacting on the junction should make a fair, reasonable and proportionate contributions towards any necessary changes. As above, the new Section 9.7 Transport Mitigation addresses these points.

3.3.36 To conclude, it is felt that comments made by National Highways, LB Barnet and TfL have been appropriately addressed and responded to in the document, and that continued engagement with these stakeholders will continue in the event that any revised designs for the Staples Corner junction emerge.

#### **4.0 Stakeholder and ward member consultation and engagement**

4.1 The former Cabinet Member for Regeneration, Planning & Growth has been regularly briefed on the development of the draft SCGA Masterplan SPD.

4.2 Ward councillors from Dollis Hill were briefed March 2023 and January 2024 on public engagement and the development of the draft SCGA Masterplan SPD. Discussions on the development of the SCGA Masterplan SPD took place with the Local Plan Member Working Group February 2023 and February 2024. Further engagement and consultation has taken place recently with members. The draft Masterplan was presented at Brent's Quality Review Panel January 2024 and June 2024. London Assembly Member Hirani was briefed January 2024.

4.3 Statutory public consultation was undertaken for 6 weeks in line with the relevant Regulation and as set out in this report.

#### **5.0 Financial Considerations**

5.1 Costs to produce the SCGA Masterplan SPD are being met through existing Neighbourhoods and Regeneration budgets and earmarked reserves.

5.2 There are no spending commitments entered into as a result of the approval of this document. However, Cabinet should be made aware of the following implications of new development, which are summarised below at a high level (with assumptions) and which will require further detailed analysis in the future.

5.3 The SCGA Masterplan SPD identifies the capacity to deliver between 2,935 and 3,066 additional homes. The increase in the council tax base could generate between £1.1m and £2.2m of additional council tax income per year at today's rates, depending on the details of development.

5.4 The SCGA Masterplan SPD also suggests an increase in commercial floor space of up to 120,381m<sup>2</sup>, which could result in additional business rates

income when compared to the existing amount of commercial property in the area.

- 5.5 New developments will bring increased costs for the council through the need for additional refuse collections, greater demand for social services, and higher pressure on existing community resources. Some of the new refuse collection costs could be covered by the existing contracts threshold for growth. A detailed analysis would need to be carried out to estimate the full extent of all the additional costs.
- 5.6 The impact on community resources could be mitigated through the collection of additional Community Infrastructure Levy (CIL) payments from developers. For example, the addition of 3,066 new homes could net up to £25.7m in CIL contributions. A more detailed estimate will not be possible until planning applications are submitted.
- 5.7 The report gives high-level consideration to potential funding streams that could aid delivery, and these will need to be maximised upon implementation. Examples include Government / GLA grant funding (e.g. the New Homes Bonus or similar future affordable housing incentives) and local funding in terms of Section 106 planning agreements.

## **6.0 Legal Considerations**

- 6.1 Town and Country Planning (Local Planning) (England) Regulations 2012 provide for Local Planning Authorities to adopt Supplementary Planning Documents. These documents are to provide more detailed guidance on how a development plan policy will be interpreted in the determination of planning applications. Supplementary Planning Documents cannot introduce new policy or allocate sites for development.
- 6.2 A Strategic Environmental Assessment (SEA) Screening Statement has been prepared to support the SCGA Masterplan SPD. This has concluded that a SEA is not required due to the Masterplan SPD supplementing policies covering the area, which have already benefitted from consideration in the Brent Local Plan SEA.

## **7.0 Equity, Diversity & Inclusion (EDI) Considerations**

- 7.1 The Equality Act 2010 introduced a new public sector equality duty under section 149. It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Council must, in exercising its functions, have “due regard” to the need to:
1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
  2. Advance equality of opportunity between people who share a protected characteristic and those who do not.

3. Foster good relations between people who share a protected characteristic and those who do not.
- 7.2 Equalities Analysis has been undertaken and is at Appendix 3. The SCGA Masterplan SPD aims to deliver new jobs, homes and infrastructure, and in doing so support good growth, deliver high quality placemaking, and ensure social, economic and physical regeneration brings forward transformational changes, contributing to a vibrant and inclusive neighbourhood. By facilitating these objectives, the SCGA Masterplan SPD has the potential to benefit the businesses, residents and diverse communities in Staples Corner and surrounding areas.
  - 7.3 The SCGA Masterplan SPD has the potential to have positive impacts on existing and new communities, including groups with protected characteristics, as it will identify a range of placemaking, environment and sustainability principles which should apply to and guide comprehensive redevelopment of the area. There may also be specific positive impacts on groups with protected characteristics. Improvements to the public realm and redevelopment are likely to benefit all groups, particularly people of different age groups and those with disabilities. Provision of accessible and affordable housing will also benefit disabled people and those from socio-economically disadvantaged backgrounds. Given that Staples Corner and the surrounding areas have a high Black, Asian and Minority Ethnic population, regeneration in the area providing improved connectivity, infrastructure and employment opportunities is likely to benefit these groups.
  - 7.4 The analysis also identifies some businesses may need to move to alternative premises whilst redevelopment takes place. This could affect some ethnic groups more than others. The SCGA Masterplan SPD recommends a phased approach to regeneration and that new development proposals retain businesses in the area and protect local employment wherever practical, supported by a Business Relocation Strategy.

## **8.0 Climate Change and Environmental Considerations**

- 8.1 The council declared a climate and ecological emergency in 2019 and set out it would do all reasonable in the council's gift, within available resources and competing priorities, to aim for carbon neutrality for the borough by 2030. The council has subsequently adopted a Climate and Ecological Emergency Strategy (2021-2030) which sets out the council's route map to achieve this aim.
- 8.2 The council's climate and ecological emergency strategy has five key themes. These are: 1) Consumption, Resources and Waste; 2) Sustainable Travel; 3) Homes, Buildings and the Built Environment; 4) Nature and Green Space; 5) Supporting Communities. It is important that regeneration schemes are therefore taking into account the aims and objectives of these five themes.
- 8.3 The SCGA Masterplan SPD has been developed from the outset with environmental sustainability embedded in the proposals with consideration to

opportunities for an aspirational and innovative energy and sustainability strategy. It aspires to create a place that is low carbon, resource efficient, high quality and that promotes health and well-being for future generations.

- 8.4 When considering this scheme alongside five key themes of the council's climate and ecological emergency strategy, the following key points have been addressed within the report content and are thematically grouped below.

#### Theme 1 – Consumption, Resources and Waste

- Paragraph 3.1.2 – explains that the scheme will see new homes alongside new and refurbished industrial premises in a way that supports the *transition to a net zero carbon circular economy*.

#### Theme 2 – Sustainable Travel

- Paragraph 3.3.12 – sets out the provisions being considered to encourage improved accessibility via active travel and public transport, with the residential uses being car free except for wheelchair provision and proposals for Controlled Parking Zones on surrounding residential streets
- Paragraph 3.3.13 – outlines that improved connections to public transport via Brent Cross West Station are integral to the scheme.
- Paragraph 3.3.24 – TfL have been consulted on the proposals and provided comment on the active travel elements to the scheme.

#### Theme 3 – Homes, Buildings, and the Built Environment

- The following design and build principles and opportunities have been considered as part of this process :
  - Proposals for new development at Staples Corner should be based on a fabric first approach with efficient services and exceed minimum requirements for carbon reductions.
  - Passive solutions should be prioritised to mitigate potential overheating risk. Building massing should consider the surroundings, and buildings should be designed following London Energy Transformation Initiative (LETI) guidance with efficient form, solar orientation, and shape factor to maximize ability for natural ventilation in a dual-aspect flat configuration.
  - Renewable energy generation should be maximised on site.
  - A district heat network (DHN) is proposed, which could utilise the waste heat from the data centre on site (721-721A North Circular Road), and would offer a great opportunity for neighbouring buildings to connect and reduce their carbon footprint. An additional opportunity for linking the site to the heat network nearby in Barnet as part of the Brent Cross regeneration scheme could also be explored as part of London's Zero Carbon Accelerator programme
  - Any additional street lighting should be LED, in accordance with the rest of Brent's street light population
- Paragraph 3.3.16 and para 3.3.31 – outlines that climate adaptation risks with regards to flood risk, and potential solutions have been considered.
- Paragraph 3.3.28 – states that, with regards to historic buildings, design code R.03 has been considered and that therefore that 'opportunities for

reuse, adaptation and retrofitting must be explored as a first approach to any and all development proposals’.

#### Theme 4 – Nature and Green Space

- Paragraph 3.3.11 – sets out provisions which have been included for a series of new open spaces and pocket parks, as well as improving access to existing park spaces.
- Paragraph 3.3.17 – states the planning policies which are in place to protect wildlife habitats and protected species where possible.
- Paragraph 3.3.30 – outlines that the Canal and Rivers Trust have been engaged with as part of the process to date, and specific issues raised relating to environmental sustainability have been addressed.

#### Theme 5 – Supporting Communities

- Sections three and four of the report set out the consultation and engagement to date with key stakeholders and ward members.

8.5 It is therefore deemed that, to date, the scheme has adequately considered the environmental sustainability implications and aligns broadly to the council’s aims within its climate and ecological emergency strategy, which will remain under close review.

### **9.0 Human Resources/Property Considerations (if appropriate)**

9.1 None are identified.

### **10.0 Communication Considerations**

10.1 The council’s website to be duly updated to include the adopted SCGA Masterplan SPD.

#### **Report sign off:**

**Alice Lester**

Corporate Director of Neighbourhoods and  
Regeneration