

Appendix 1

Brent Design Guide Supplementary Planning Document (SPD1)

Consultation Statement

November 2018

This Consultation Statement has been prepared in accordance with Regulation 12(a) and (b) of the Town & Country Planning (Local Planning) (England) Regulations 2012.

Background

The Brent Design Guide for New Development Supplementary Planning Guidance (SPG17) was adopted in October 2001. Since the adoption of the 2001 SPG, local circumstances, national, regional and local planning policies have all substantially changed. There has also been a plethora of design guidance produced at a national and London wide level in this period.

The Brent Design Guide (SPD1) provides advice on key urban design principles. It gives a positive message that Brent essentially welcomes and encourages new development of high quality design and recognises the benefits that it can bring. It aims to assist developers, designers, local communities, planning officers and the Planning Committee to better understand what is expected of new development depending on its surrounding context.

Area of coverage

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

Consultation

A previous draft version of the SPD1 had undergone public consultation from 6th July to 17th August 2017. However, significant changes were recommended which mean that the document had to be consulted on once more. These changes included a change of the structure, clarifications and more extensive guidance, including significantly more images, illustrating the guidance with good and bad examples. The revised SPD1 will be better fit for purpose in guiding development to achieve high quality design.

The updated Draft SPD1 has undergone public consultation (Regulation 13 stage) between 24th May and 5th July 2018. In accordance with the council's Statement of Community Involvement, during the consultation period:

- the SPD and this consultation statement was available on a dedicated website www.brent.gov.uk/SPD1, at Brent Civic Centre and in Brent Libraries

- interested groups on the Local Plan consultation database were emailed and invited to comment
- the consultation was publicised via social media

These comments have been considered and revisions have been made to the final SPD. A summary of comments received, together with any recommended changes to the SPD, can be found below.

The Brent Design Guide (SPD1) was presented to Cabinet in November 2018 for its consideration and adoption.

Consultation Responses and Changes

Consultation responses to the latest public consultation in 2018 and subsequent changes made to the document are set out below.

Respondent	Network Rail
Response	No comments
Officer Response	Noted
Recommendation	No change
Respondent	Sanjai Mehta
Response	<p>I'm in favour of the design guide and principles laid out in the document. However, is this not a case of closing the stable door after the horse has bolted? You can see examples of the poor design that you have documented all over the borough and whilst I get that the aim is to prevent these mistakes happening again, who is going to police this and what is going to happen to those existing bad designs? Often planning applications will use an existing building as the basis of their case for their design and with so many examples already in the borough, what is to stop a bad design being approved at appeal? It would be great to see a regeneration plan associated with this design doc that deals with the current poor environment.</p>
Officer Response	Support for the document welcomed. The aim is indeed to prevent mistakes happening, wherever possible. Improved guidance is a first step to better applications.
Recommendation	No change
Respondent	Sport England
Response	<p>Sport England have reviewed the revised document and note the lack of reference to Active Design. Some Active Design principles, however, are included to some extent within the document albeit not referenced as such or related to the Active Design Guidance. As a result, Sport England's comments are as set out in its previous representation sent on 8th August 2017 which is attached for convenience.</p> <p>Sport England recommend that the Draft Brent Design Guide Supplementary Planning Document has clear references to Active Design, its principles and the Active Design Checklist to inform development proposals. This would build upon the reference to Public Health England and the TCPA document referred to on page 6 of the Draft Design Guide. In regard to the Active Design Checklist, there could be a requirement for any development proposal coming forward to have it assessed in line with the checklist to ensure that proposals can really have a positive impact on the health of a community. Alternatively, the Design Guide could include a paragraph as follows:</p>

	<p>The design and masterplanning of development proposals will embrace the role they can play in supporting healthy lifestyles by facilitating participation in sport and physical activity. To do so they will, as far as is relevant to the specific development proposal, adhere to the following Active Design principles:</p> <ul style="list-style-type: none"> ▪ Activity for All <i>Enabling those who want to be physically active whilst encouraging those who are inactive to become active.</i> ▪ Walkable Communities <i>Creating the conditions for active travel between all locations.</i> ▪ Connected Walking, Running and Cycling Routes <i>Prioritising active travel through safe integrated walking, running and cycling routes.</i> ▪ Co-Location of Community Facilities <i>Creating multiple reasons to visit a destination and minimising the number and length of trips and increasing the awareness and convenience of opportunities to participate in sport and physical activity opportunities..</i> ▪ Network of Multifunctional Open Space <i>Providing multi-functional spaces opens up opportunities for sport and physical activity and has numerous wider benefits.</i> ▪ High Quality Streets and Spaces <i>Well designed streets and spaces support and sustain a broader variety of users and community activities</i> ▪ Supporting Infrastructure <i>Providing and facilitating access to facilities and other infrastructure to enable all members of society to take part in sport and physical activity.</i> ▪ Active Buildings <i>Providing opportunities for activity inside and around buildings, rather than just between buildings.</i> ▪ Management and Maintenance <i>A high standard of maintenance is essential to ensure the long term attractiveness of sports facilities along with open and public spaces.</i> <p>More information on Active Design, including the guidance and checklist, can be found via the following link; www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design</p> <p>Overall, Sport England strongly advise that the Council consider the health and wellbeing of future residents and acknowledge that the built environment and urban design of a place can be a significant factor in creating healthier communities. In consequence, Sport England recommend that the Council amend the Draft Brent Design Guide Supplementary Planning Document to incorporate Active Design, including its principles and checklist.</p>	
Officer Response	Noted. We'll add reference to Active Design guidance	
Recommendation	p.22: "Local streets, including the vast majority of residential streets, should be designed to prioritise pedestrians and placemaking, providing for parking and access to vehicles at low speed. <u>They should be designed to accommodate the principles of Active Design (Sport England, 2015).</u> "	
Respondent	Historic England	
Response	<p>Historic England welcome the aspirations of the document "to balance the best of existing places with the benefits of change and new development, respecting the local character and build on the existing natural and built environment." We particularly agree with the first principle that for design to be considered successful, it should respond to the local context, respect existing character of the landscape, streetscape, architectural and historic environment. To achieve this, a full understanding of the local context and any elements of historic character and significance should always be the starting point when developing schemes and plans.</p> <p>Taking a contextual approach is also highly relevant in regeneration areas such as Wembley and Alperton. While the quantum of development may be much greater, in large part because the historic environment is less sensitive and of a lower significance, development should still have regard to the existing context so that it is coherent with the townscape surrounding it, and has a genuine sense of place. Drawing on the historic environment is a proven way to support good place making in regeneration areas, with schemes like Deptford Market Yard, Kings Cross and Bankside all highlighted in our recent publication on Good</p>	

	<p>Growth in London.¹ We would encourage you to ensure that this is clear within the Design Guide, as it is ambiguous at present. Historic England will be producing a Place Making Strategy in the coming months which will provide further advice that is likely to be useful to you on this point.</p> <p>In terms of assessing local character we would encourage you to undertake a borough characterisation study. Historic England commissioned Land Use Consultants to assess characterisation across London and produce some best practice guidance on how to produce this type of study.² The LUC report illustrates that Brent is in a minority of Boroughs without a borough wide characterisation study, which in our view would greatly support the delivery of the principles in the Design Guide. Historic England also commissioned Allies and Morrison to do a broad brush characterisation of London, with a view to assessing how different character types can support greater densities of development. Some of this RIBA award winning work has been integrated into the draft London Plan (2017) and may also be of use when considering how to implement the principles in this Design Guide.³</p> <p>Historic England promotes Historic Area Assessments as a useful tool for understanding smaller areas of local character.⁴ We have produced reports on Old Oak and Kingston Town Centre which illustrate how this approach can inform plans for future growth areas, which may prove useful to the Council or developers of major sites.⁵ Finally, we would also strongly encourage you to highlight within the Design Guide how local communities can get involved with assessments of local character – particularly neighbourhood forums and amenity groups. Tools such as Place Check, and the Oxford Tool Kit, are designed to empower communities who are often best placed to understand the deep rooted character of the places they live and work in.⁶ Recent work on the Harlesden Neighbourhood Plan illustrates the benefits of encouraging Neighbourhood Forums to do this type of exercise.</p> <p>In relation to tall buildings (p. 6) you should note that the 2007 EH/CABE guidance has been superseded. In 2015 Historic England has produced our advice note 4: Tall Buildings, which is our most up-to-date advice on this subject.⁷ We recommend that you update the reference in your document to reflect the above change. Similarly, in addition to promoting CGIs and physical models to illustrate the design of tall buildings, we would encourage you to consider how 3d digital models could be used to understand impacts and support better plan and decision making in relation to tall buildings. We look forward to engaging with you further on this issue through your forthcoming Tall Building Strategy, Local Plan site allocations and master plans.</p> <p>In relation to public realm, we have recently updated our Streets for All guidance, both nationally and locally.⁸ These documents provide best practice advice on how to maintain and enhance the qualities of the public realm, which often makes a key contribution to local character. This guidance may help add some local nuances to your Design Guide to respond to particular problems with the public realm that you may identify in Brent. Associated with this you may wish to give further consideration to your advice on lighting, which is generic at present. With the increased use of LED light fittings, which are more flexible than previous technologies, it is possible to represent places through the considered use of light, for example drawing attention to cultural and historical destinations and focal points. The City of London recently produced a draft document looking at this issue which may be of interest to you in this regard.⁹</p>
Officer Response	<p>Support for the document welcomed. Brent is in the process of undertaking a Characterisation Study. This will undergo public consultation together with the new Local Plan, so the public will be able to be involved.</p> <p>Brent is signing up to VUcity, which will provide 3D support to the Tall Building Strategy, Site Allocations and masterplans.</p>
Recommendation	<p>p.4: “For larger scale planned regeneration of extensive areas, like the Wembley Park masterplan and parts of the Alperton masterplan, a new urban character can be created, <u>while drawing on the existing context and historic character and ensuring it is coherent with the townscape surrounding it. Brent’s upcoming Characterisation Study will assist with identifying character, but detailed local context and character analysis will still be required.</u>”</p> <p>p.6: “and other policies and guidance including ‘<u>Historic England Advice Note 4; Tall Buildings</u>’ Design Council CABE’s Guidance on Tall Buildings (2007).”</p>

Respondent	Highways England
Response	No comment
Officer Response	Noted
Recommendation	No change
Respondent	Natural England
Response	No comment
Officer Response	Noted
Recommendation	No change
Respondent	DBplanners
Response	<p>The 45 degree rule is too vague and out of date, especially for measurements taken from rear gardens. We have a recent application that has faced issues whereby a garden depth of 33m from the nearest neighbour is not considered sufficient gap because the 45 degree is taken from the end of the 33m garden depth. However, the SPD1 suggests that 18m for new development back to back is acceptable for 2-storey development, with each new house having a garden depth of 10m, with windows facing each other at 20m. And yet under the previous SPG17 and vague SPD1 if applied to the end of a garden, even a 40m or 50m rear garden would still cause issues for a new 2-storey building to be sited behind the immediate boundary of the garden because it would breach the 45 degree even though from back to side the gap would be 40m or 50m.</p> <p>To apply the 45 degree rule beyond 18m or 20m which is in line with the back to back rule, is considered fairer and more reflective of overall design guide policy. If a gap of 20m is retained between the back elevation of an existing house and the side elevation of a new house that should be considered sufficient to prevent overbearing and as it's a new side elevation there would be no windows anyway so privacy is not an issue either. Also it appears officers apply the rule differently across applications with some taking the 45degree from front or rear windows and others from the end of a garden, irrespective of the garden's length. The policy as set out in the SPD1 will reduce the available small sites options that the draft London Plan now seeks to promote.</p>
Officer Response	The 45 degree guide is very precise and intended to cover the amenity of private outdoor space. It also protects the prospects of future development on adjacent sites. In this example the property with the long garden could in future develop part of it, without all or most of the opportunity going to whoever develops a site first, so the 45 degree rule is fairer.
Recommendation	No change
Respondent	TfL (Transport for London)
Response	The document is broadly in line with the strategic transport policies of the London Plan. However measures that promote the uptake of cycling and walking and help to deliver the Healthy Streets approach set out in the Mayors Transport Strategy, should be integrated into the design of all new development. Of particular relevance would be TfL's Streetscape Guidance, London Cycle Design Standards (LCDS) in relation to cycle parking design and draft London plan policy D7 public realm. 4.2 Parking – TfL note that in areas of high Public Transport Accessibility (PTAL) and in and near town centres the guidance's stated aim is for car-free developments. TfL welcomes the promotion of car free development; however, the guidance should also refer to the other areas where this would be sought, as set out in the draft London Plan, and the maximum standards which would apply elsewhere in the borough.
Officer Response	Will include reference to Healthy Streets and guidance documents. Parking standards are provided in the Development Management Policies document and it is felt no further guidance on the standards are needed in this Design Guide document. The appropriateness of car-free development outside town centres and high PTAL areas will be assessed on a case-by-case basis.
Recommendation	p.22: "Local streets, including the vast majority of residential streets, should be designed to prioritise pedestrians and placemaking, providing for parking and access to vehicles at low speed. <u>They should be designed to accommodate the principles of Active Design (Sport England, 2015) and Healthy Streets. Of particular relevance would be TfL's Streetscape Guidance, London Cycle Design Standards and London Plan policy D7 Public Realm.</u> "
Respondent	TfL Commercial Development (acting in its capacity as a local landowner)
Response	<p>Density Height and massing (P6) – It is welcome that the document identifies that new development should 'optimise the potential of sites'. TfL CD is working on a number of development sites within the London Borough of Brent which are suitable for optimising residential led development due to their proximity to transport infrastructure. TfL looks forward to working further with Brent to deliver development designed to a high quality on sites within its ownership.</p> <p>Tall buildings (P6+7) – The draft guide acknowledges 'the role tall buildings can play in increasing densities in certain locations.' Currently the locations defined for tall buildings as set out in the Wembley and Kilburn areas are tightly defined, and the current Local Plan does not encourage such buildings (30m+) outside of these tightly defined areas. The draft design guide states that "in areas of Brent that are more suburban in character, new tall buildings are unlikely to be appropriate." TfL owns land to the North of Brook Avenue in Wembley Park which lies within the Wembley Growth Area and is potentially suitable for a tall building. However, this falls just outside the area which the Brent Local Plan identifies</p>

	<p>as acceptable for tall buildings. This draft design guide SPG and further consultation on a revised Brent Local Plan should give the council an opportunity to analyse the existing character of places and establish new approaches to assess the acceptability of tall buildings of high quality design in line with Draft London Plan policies.</p> <p>P17 Parking – The draft guide states that in areas of high public transport accessibility and near town centres, car-free development may be appropriate. Much of TfL's land in the borough, including the disused rail sidings to the north of Wembley Park has high PTAL ratings and is appropriate for car-free residential development.</p> <p>P28 Amenity and Services – The draft guide states that there should be an 18m distance between buildings to promote adequate garden sizes and privacy. Well-designed high density development may not require a gap of 18m between buildings but can still promote adequate amenity spaces and protect privacy. Higher density developments should be assessed on a case by case basis taking into account the design quality of the scheme and the position of windows and room type.</p>
Officer Response	<p>Noted. The upcoming Characterisation Study, Tall Building Strategy and new Local Plan, including policies on Tall Buildings, Growth Areas and Site Allocations, do indeed provide the opportunity to analyse the existing character of places and establish new approaches to assess the acceptability of tall buildings. This may result in the TfL-owned site being identified as suitable for tall buildings. Sites with high PTAL may be appropriate for low-car or car-free development; which will be identified on a case-by-case basis.</p> <p>The SPD already states that "Reduced distances between new frontages may be acceptable subject to consideration of overlooking and privacy as well as high quality design and solutions which can sometimes mitigate impacts and allow for efficient use of land."</p>
Recommendation	p.7: "In the areas of Brent that are more <u>predominantly</u> suburban in character, new tall buildings are unlikely to be appropriate."
Respondent	Brent Cyclists
Response	<p>Overall, the plan prioritises motor traffic space and speeds over the safety and space for vulnerable road users. The plan must mention separate safe cycle infrastructure, in particular on collector roads. The plan must not propose "shared space" as a universal solution, shared space puts vulnerable road users into conflict with motor vehicle traffic without doing anything to limit motor vehicle traffic numbers or speeds. The plan must state that motor vehicle movements are to be minimised and give examples of solutions to achieve this, including car-free developments, 20mph zones, filtered permeability, minimising on-street parking.</p> <p>Section 4.2 Parking – We do not support the statement that "Positive parking solutions include on-street parking". Brent Council should discourage on-street parking, especially where this takes from space which would otherwise be used for pedestrian or cycle infrastructure, and preserves public space for the storage of personal property (motor vehicles). We support the proposal of "car-free developments", this must be taken on an area wide approach to avoid car parking "spilling over" into neighbouring residential areas. Brent must not allow parking which takes pavement space from pedestrians in new designs.</p> <p>Section 4.5 Public Realm – We support the statement that "Local residential streets, which make up the majority of streets, should be designed to ensure pedestrian priority over vehicles and actively limit vehicular speeds through street layout and materials." This should be stronger, and state that local residential streets must not be through routes for motor vehicle traffic (i.e. permeable filtering), and must be 20 mph or below. We strongly oppose the statement that "Streets should be designed as shared space where possible". Shared space does not work, it allows motor traffic to bully vulnerable road users. Instead separate infrastructure must be provided for cycling and walking unless motor vehicle traffic speeds and numbers are very low (< 20 mph and < 2000 pcu per day). We support the statement that "Pedestrians, cyclists and public transport should generally take priority over private cars." However the current proposals will not achieve this. We disagree with the statement that "Tarmac is not an appropriate material for any shared surface or any footpath." Tarmac is suitable, and often cheaper and much harder wearing than "fancier" alternatives. Fancy paving does not make a street safe: physical separation, low motor vehicle numbers and speeds, make a street safe. We do not support the inclusion of images showing on-street parking in new developments.</p> <p>Section 4.6 Larger Developments – We strongly disagree with the statement that "Dead-end routes, for any mode of transport, should be avoided wherever possible. Routes for all modes of transport should be combined in the same location (streets) wherever possible, as opposed to separating pedestrian routes and vehicle access." Instead filtered permeability must be supported, and encouraged by the SPD, This will keep vehicle flows and rat running low, while making streets safe and attractive for vulnerable road users. We disagree with the statement that "[sites] should provide ease of movement for all, within and through the site; facilitating desire-lines wherever possible." Through routes for motor vehicle traffic should be removed in new residential developments, instead filtered permeability must be supported,</p>

	<p>and encouraged by the SPD.</p> <p>Section 4.7 Urban Design Checklist – We strongly oppose the checkpoint "Does the development provide a mix of positive parking solutions, including a significant level of on-street parking?" Instead minimal on-street parking should be provided, especially where this takes from space which would otherwise be used for pedestrian or cycle infrastructure, and preserves public space for the storage of personal property (motor vehicles).</p> <p>Section 5.3 Services, bins and bike storage – We support the statement that "Development will be expected to provide adequate provision for cycle parking in accordance with London Plan policies." However this must be strengthened as follows: "Development will be expected to provide adequate safe and secure cycle parking, for residents and visitors, in accordance with London Plan policies."</p>
Officer Response	<p>Noted.</p> <p>The Design Guide SPD is predominantly a design guide and, although there is overlap, it is not a transport / highways focused guidance document. Reference to Healthy Streets and guidance documents, including London Cycling Design Standards and West London Cycle Parking Guidance, will be included.</p> <p>Parking – Parking is intended to cover not just that of the private car, but also that for bicycles. The document promotes measures to reduce car use and ownership (such as car-free and car-lite developments) and encourages more active modes of travel such as walking and cycling. It does not go into further specific measures as its focus is towards buildings and their place/interaction with the local environment. Car parking is covered by Brent's Development Management Policy DMP12 and London Plan policies D7 and T6, which may alleviate your concerns. The Council embraces car free development where parking management measures are in place and alternatives modes of travel are either existing or to be provided. Where development is located in areas of high public transport accessibility but no parking management for the immediate areas is proposed then reduced levels of parking will be implemented. The Council is in the process of updating the Local Plan, which will include public consultation in due time.</p> <p>Public realm – The SPD provides design guidance for new development and reflects existing policies. Deciding on speed limits, implementation of filtered permeability and new cycle routes is outside of the scope of the document. Highway and transport design guidance and transport policies will be used in designing infrastructure.</p> <p>Larger Developments – Filtered permeability can be used in combination with continuous routes that provide the quickest routes along desire lines for pedestrians and cyclists.</p> <p>Urban Design Checklist – On-street parking increases street activity and is essential for visitor parking and deliveries. Alternative travel options can reduce negative impacts of cars on the street scene.</p> <p>Services, bins and bike storage – We can clarify cycle parking provision requirements as suggested.</p>
Recommendation	<p>p.17: Visual example of well-designed on-street cycle parking will be included instead of one of the on-street car parking images.</p> <p>p.17: "New development should provide a mix of positive parking solutions for cars, motorcycles and bicycles, including a suitable level of on-street parking for cars and bikes wherever possible.</p> <p>p.21: "Streets should be designed for people and provide for a pleasant place to be in, as shared space where possible, following 'Manual for Streets' guidance and Transport for London's (TfL) 'Healthy Streets' approach will be used in their design."</p> <p>p.21: "Where sShared surface streets are provided they should be designed to ensure pedestrian priority is clear to all and pedestrians feel and be safe and comfortable for all vulnerable road users to share the street with vehicles."</p> <p>p.22: "Local streets, including the vast majority of residential streets, should be designed to prioritise pedestrians, cyclists and placemaking, providing for parking and access to vehicles at a low speed environment. They should be designed to accommodate the principles of Active Design (Sport England, 2015) and Healthy Streets. Of particular relevance would be TfL's Streetscape Guidance, London Cycle Design Standards, West London Cycle Parking Guidance and London Plan policy D7 Public Realm."</p> <p>p.22: "facilitating desire-lines for pedestrians and cyclists wherever possible, potentially using filtered permeability where appropriate."</p> <p>p.25: 4.2a "Does the development provide a mix of positive parking solutions for cars, motorcycles and bicycles, including a significant suitable level of on-street parking for cars and bikes?"</p> <p>p.29: "Development will be expected to provide adequate provision for safe and secure cycle parking, for residents and visitors, in accordance with London Plan and sub-regional policies."</p>
Respondent	Environment Agency
Response	No comment

Officer Response	Noted
Recommendation	No change
Respondent	St George Ltd
Response	<p>In August 2017 St George responded to the draft Brent Design Guide SPD consultation, providing comments on a range of matters. We are pleased to note that the current consultation draft addresses almost all of these comments.</p> <p><u>Chapter 2 – Context and Character</u></p> <p>St George welcomes where it states that “<i>development will take appropriate cues from its surrounding area</i>” (p.4). However, St George considers it important that, especially for larger independent sites, flexibility is given for design to come forward which does not necessarily mimic local design characteristics such as style, forms and material but responds appropriately to these local cues. This will allow high quality places to be delivered that create their own sense of place.</p>

We are pleased to note that the Draft Design Guide includes part of the Alperton masterplan area as somewhere that a new urban character can be created. The Draft SPD does not specify which parts of the masterplan area this relates to. The former Northfields Industrial site falls within the Alperton masterplan area and is also identified in the Core Strategy as suitable for release from its Strategic Industrial Land designation. Now the subject of a planning application for its redevelopment to provide a new community, this part of the masterplan has the potential to bring about larger scale regeneration of the area.

On this basis, St George considers that this part of the masterplan should be included as somewhere that a new urban character can be created. As a result, the Draft Design Guide should apply its guidance on these new urban character areas flexibly to allow for new (and good) design to come forward.

Landscape: St George supports an approach which promotes development that encapsulates positive existing landscape features into its design. In some instances it may not always be possible to capture all of these features and so it is suggested that the guidance reads *"the existing landscape character should inform new development and positive landscape features, including trees, watercourses and views, should be retained where possible"*.

3.1 Density, Height and Massing

Tall buildings: In its Core Strategy Issues and Options consultation in March 2018, the LBB sought comments on the appropriate locations for tall buildings. As part of our response to this, we proposed that appropriate locations for tall buildings should be identified and tested through the design process. This will mean that as local character changes over time, tall buildings can come forward in areas that might otherwise have been deemed to be inappropriate at the beginning of the plan period.

Where the guidance states that *"buildings are expected to step down in scale towards the site boundaries and nearby lower buildings, to effectively limit the impact of the change in scale and respect the surrounding character"* (p.6), it is considered that flexibility should be introduced to allow for instances where it is appropriate for tall buildings to come forward on site boundaries.

St George agrees with the statement on p.6 which says that tall buildings have a role to play in increasing densities. This is at odds with the statement on p.7 which says that *"tall buildings can generally be seen from far away and have a wide visual impact on local character, while having little impact on the density of the area"* (our emphasis).

Bulk, scale and massing: St George agrees that buildings should not impact negatively on the local and wider area and that homogenous design and facades should be avoided. This proposed section of the guidance prescribes ways in which the appearance of massing can be reduced through approaches such as dividing buildings into a clear base, middle and top section. Care should be taken to not be overly prescriptive in this section, to provide flexibility for when good design comes forward which does not necessarily incorporate these approaches but ensures that development does not appear overbearing or bulky. Such instances may particularly be the case where large-scale planned regeneration is being delivered which has a new urban character.

3.2 Animated facades

Active frontages: Active frontages are welcomed as they can play an important role in making places feel safe and vibrant. However, it is considered that buildings on street corners should aim to be dual fronted, this is to allow for instances where it is not feasible to deliver this. Regarding habitable rooms at ground floor level, the guidance should be mindful that developments may need to incorporate

design features which protect the privacy of residents but may not strictly adhere with other aspects of the SPD. On this basis, flexibility should be introduced to this section.

Regarding ground floor apartments to be delivered with their own private front doors, flexibility should be inserted into this section of the guidance to allow for instances where it is not possible to provide front gardens for each home. The guidance should allow flexibility for ground floor apartments to be accessed from an internal core in the event this can be achieved through good design.

3.3 Urban grain

Plot widths: Given the scale of development expected to come forward in regeneration areas such as Alpertown and Wembley, and that these areas are expected to have their own urban character (p.4), it is suggested that this aspect of guidance should allow some flexibility for when different plot widths would be more appropriate.

Direction and human scale: Poor design of large buildings blocks can result in a development which is bulky and overbearing and it is agreed that this should be resisted. Good design, which breaks up massing is crucial to delivering successful places in terms of appearance. However, a range of scales of development is expected to come forward in the borough, including larger developments which can successfully support varying plot sizes. These may not necessarily suit a design based on the appearance of houses so it is considered prudent to insert flexibility into this aspect of the guidance to allow for instances where it is appropriate for other designs to come forward.

3.5 Proportions

Dimensions: Creating a design which assimilates well into the existing built form is important. It is considered that there may be occasions where the use of more traditional dimensions of windows may not be appropriate and that, through good design, an alternative solution can be found. Where this is the case, the SPD should allow for this.

Void-mass ratio: The guidance should allow for instances where development including uses such as shops and restaurants comes forward which, traditionally, has larger areas of glazing.

4.1 Block structure and active frontage

Non-residential uses: Confirmation is sought on whether it is intended to apply this aspect of the guidance to industrial uses. Noting that industrial uses do not always lend themselves to providing active frontages or including small pockets of retail, it is considered worthwhile making clear that this part of the guidance should not be applied to industrial uses.

4.4 Front gardens

It is agreed that front gardens can fulfil a wide range of important uses including environmental, visual, social and personal. In some instances, gardens or privacy strips less than 2m deep which are proposed to be landscaped can provide a successful buffer between private and public land. On this basis, it is suggested that the wording is amended to state *"Unless already proposed to be landscaped, gardens or 'privacy strips' that are too small (less than 2m deep) are less likely to be planted"*.

5.1 Privacy and amenity

The proposed guidance states that *"a distance of 9m should be kept between gardens and habitable rooms or balconies"*. It is not uncommon for large-scale residential development to deliver homes which have balconies positioned next to each other. Where this occurs, the appropriate use of screens ensures that residents' privacy is maintained. On the basis that such large-scale development will

	<p>come forward in the borough, it is considered that the draft guidance should allow for this where the privacy of residents can be protected.</p> <p>On p.27, the draft guidance states that <i>"if a development exceeds 25 degrees from the nearest rear habitable room window of adjoining existing property a sunlight and daylight study will be required"</i>. The corresponding illustrations show a 45 degree angle, which is a commonly applied rule. On this basis, we trust that the accompanying text should actually state "45 degrees" as opposed to "25 degrees".</p> <p>5.2 Private outdoor space</p> <p>St George welcomes the addition of guidance on private outdoor space, as suggested in our comments on the previous Design SPD consultation. As such, we welcome the spirit of this aspect of the guidance which seeks to ensure that residents have sufficient external private outdoor space. However, we consider that there may be occasions where sufficient external private outdoor space can be provided which does not meet the specific criteria and so flexibility should be introduced to allow for this.</p> <p>This section of the draft SPD also provides guidance on balconies and their positioning on buildings. It states that balconies should <i>"generally not [be] used at higher levels where they are subject to extreme weather conditions"</i>. Similarly, flexibility should be inserted to allow for balconies to be positioned at higher levels. Through good design, this type of private outdoor space can be provided higher up on buildings in a way that that prevents them from experiencing extreme weather conditions.</p> <p>5.4 Space standards</p> <p>The draft SPD states that <i>"the number of units per core and storey should not normally exceed 8 in order to encourage neighbourly interaction"</i>. This is recommended in the London Design Guide. On this basis we consider that, as a recommendation, this section of the draft guidance is acceptable.</p> <p>Regarding the internal corridors, the draft SPD states that they should be 1.5m wide as a minimum and have windows which open to promote cross ventilation and maximise daylight. Given the function of corridors (as a means of access to homes) it is not considered necessary for these to benefit from daylight. Moreover, more effective ventilation can be provided mechanically as opposed to from windows. This is based on our experience of delivering a number of schemes where internal corridors have successfully benefitted from mechanical ventilation.</p>
Officer Response	<p>Noted. Support is welcomed. We aim to clarify unclear elements in this response.</p> <p>Context and character – Northfields does create a new character and the relevant planning application is being determined ahead of SPD1 being adopted. The document cannot go into the detail of describing every relevant site in the borough. Retention of important landscape features is always possible, but every application will be judged on its merits.</p> <p>Density, height and massing – The reference from p.7 refers to areas that are not identified as appropriate for tall buildings. One or two tall buildings in a low-rise area will have no significant impact on density, but a huge impact on character. The proposed guidance is not very prescriptive and the minimum deemed necessary to ensure quality development.</p> <p>Animated facades – The guidance is worded very flexibly and identifies potentially unavoidable parts of inactive frontage. Private front doors do not require front gardens and are an essential part of active frontage and good design.</p> <p>Urban Grain – In areas where a new character can be appropriate, the new character will still benefit from the visual advantages of a finer grain and breaking up large building blocks effectively. The reference to houses relates to layout and access and vertical expression and is noted to only apply where possible. This is considered a good design principle that relates to massing and active frontage.</p> <p>Proportions – The guidance only refers to local character, so most relevant where traditional window dimensions exist. Even where they do not, traditional dimensions will rarely be inappropriate. The New London Vernacular is a good example of a modern style that incorporates traditional window dimensions and void-mass ratios. The guidance does suggest fitting in with existing character and traditional shopfronts (with larger areas of glazing). Shopfronts SPD3 is the relevant guidance document that provides more detail for these situations.</p> <p>Block structure and active frontage – The application for industrial uses would depend on the site and will be considered on a case-by-case basis. For an industrial use only application within a protected</p>

	<p>industrial site, active frontage will be less important and more difficult to achieve than for mixed-use applications along mixed use streets.</p> <p>Front gardens – As identified in the SPD, it is expected that developers will provide planting in any front gardens. Too narrow gardens/privacy strips may nevertheless be less likely to be maintained and provide less privacy. Therefore, a 2m minimum is recommended, but this may depend on the existing street situation as stated.</p> <p>Privacy and amenity – The 9m is intended to be between the balcony and gardens opposite, as shown in the diagram on p.28, not between balconies on the same façade, where privacy screens will be appropriate. The 25 degree reference is based on the BRE Report, 'Site layout planning for daylight and sunlight'(BR209),</p> <p>Private outdoor space – The guidance is considered to provide a suitable minimum and reflects existing policies. Any proposals will be judged on their merits. The reference of balconies on higher levels related to projecting balconies specifically. Set-back/internal balconies may still be appropriate up to a certain level.</p> <p>Space standards – The number of units per core are a maximum and relate specifically to neighbour interaction. Appropriate layout and massing may require tall buildings to have less units per floor in order to create suitable slender buildings. The text can be clarified. Windows and daylight to corridors are an aspiration, but it is agreed that these are not always essential. The text can be amended. The guidance on single-aspect units should also be clarified, including a diagram.</p>
Recommendation	<p>p.15: "Development should consist of buildings fronting onto streets in the form of perimeter blocks, avoiding single aspect dwellings typologies.</p> <p>p.30: "The number of units per core and storey should not normally exceed 8 in order to encourage neighbourly interaction. <u>Tall buildings may need to reduce the amount of flats per floor in order to create slender buildings and to minimise single-aspect flats.</u> Internal communal corridors should be 1.5m wide minimum and <u>ideally</u> have windows which open to promote cross ventilation and maximise daylight. <u>Housing development</u> The design must maximise dual aspect homes and limit the number of single aspect units <u>normally avoid single aspect dwellings.</u> The design must seek to avoid north-facing single aspect units, in particular north and south facing ones. Genuine dual aspect dwellings require different <u>facades to provide the necessary benefits and adhere to London Plan Policy D4 and paragraph 3.4.5 'single aspect dwellings'.</u> A stepped façade or corner window does not constitute dual frontage."</p> <p>p.30: New diagram</p>
Respondent	Quintain Ltd
Response	<p>General Comments:</p> <p>Prescriptive detail – Whilst Quintain recognise good design is clearly important and as a company it is at the centre of all development proposals we bring forward, the level of prescription within the SPD appears to be contrary to paragraph 59 of the NPPF which states "design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally".</p> <p>Many of the Principles within the SPD are considered to be sound and supported however, the detailed supporting text goes significantly further than the overarching Principle that is it supporting and in many cases is not justified. Each development should be judged on a case-by-case basis, rather than applying a 'one size fits all' approach. The SPD also appears to fail to recognise the adopted and emerging London Plan housing policies and targets as well as the Borough's diverse housing stock and organic design and its ability and capacity to accommodate well designed, high density developments. The SPD is very backward looking and, outside the two growth areas of Wembley and Alperton, expects the Borough to be developed along very traditional suburban principles with new developments required to reflect existing character including height, scale and massing (Section 2- Context and Character).</p> <p>The SPD should recognise that there will be other sites coming forward within the Borough which are large enough and suitably located to enable them to define their own character and should not therefore be expected to merely replicate the existing character of the surrounding area. For example to ensure Brent meets its future housing targets sites with good PTAL ratings in sustainable locations must be allowed to be developed at higher density, with greater height and innovative design providing applicants can demonstrate the environmental impacts of doing so are acceptable. The SPD must recognise this approach is appropriate in certain locations within the Borough to ensure the most productive use of previously developed land will be expected from developers. We therefore consider that before the SPD is adopted a new section must be prepared that sets out the Council's principles for urban, high density developments that will come forward within the Borough over the next 5 – 10 years. Without such guidance the SPD will be used by those wishing to prevent large scale regeneration projects from coming forward within the Borough. If the SPD is adopted in its current form, the document will make it very challenging for Brent to meet its required housing targets. A more balanced approach is therefore</p>

required which not only protects the Borough's existing character, particularly in areas that are recognised for their historic importance, whilst also ensuring new developments always make the most beneficial and productive use of land in order to deliver the significant number of new homes that are required in the most innovative and appropriate manner. Below we have provided a summary of concerns with the current drafting of the SPD. This list isn't exhaustive but provides an indication of our concerns.

Principles and Paragraphs – All Principles and paragraphs within the SPD should be numbered for ease of reference.

Images – The use of images throughout the SPD is considered to be very selective and used subjectively. They are not reflective of many other types and forms of development that would be suitable in the Borough, nor do they recognise that good design can evolve and does not always have to be a pastiche of existing styles of development to be successful or relate to the surrounding context.

Viability Impact – The impact of all of the SPD requirements, in whatever form they are adopted, must be fully considered when assessing the viability and deliverability of other key Brent targets, such as affordable housing. We do not consider this important inter-relationship has been fully assessed.

Section 2- Context and Character

This section states that, 'For larger scale planned regeneration of extensive areas, like the Wembley Park masterplan and parts of the Alperton masterplan, a new urban character can be created.' We support the reference to Wembley Park and the recognition that it is creating a new urban character but this reference should be moved to 'Section 1- Introduction' to recognise that Wembley Park and Alperton have distinct urban characteristics that are different to the majority of areas within the Borough of Brent, and this is relevant to all sections of the SPD. Furthermore, reference should be made to potential new planned regeneration sites within the Borough that are likely to emerge during the lifetime of the SPD.

Section 3.1- Density, Height and Massing

Heights on all other sites – The SPD refers to the forthcoming Tall Buildings Strategy for Brent, therefore it would be useful if the SPD could highlight what this strategy aims to achieve and what the timescales are for publishing the draft strategy, if known. The strategy should be a Borough-wide review and not just focus on Wembley and Alperton, but all areas that have potential to accommodate Brent's housing need and mixed-use developments with good transport links that benefit from existing or planned infrastructure. The SPD refers to CABE's Guidance on Tall Buildings (2007), however as this is 11 years old much of the document is considered to be outdated and unsuitable for basing forthcoming design guidance upon. An alternative to the Tall Buildings Strategy could be a criteria based policy on tall buildings to ensure future developments justify why a tall building is appropriate for that specific location. Landscape and grounding of tall buildings is also crucial to their integration within a development. Therefore, we suggest this is considered within the forthcoming strategy. We do not support the following statement within this section of the SPD, 'In the areas of Brent that are more suburban in character, new tall buildings are unlikely to be appropriate. Tall buildings are defined as structures that are taller than the local context or 30m and over.' There could be a significant range in heights between a structure that is taller than the local context and 30 metres. For example, if a four storey building was proposed on a site predominantly surrounded by two-storey houses, the proposed wording would classify this as a tall building.

Bulk, scale and massing – We do not support the statement in the SPD that buildings with a single storey base relate best to the human scale and double height glass facades should be avoided. Double height facades are considered to be appropriate in highly commercial areas such as town and city centres and are an attractive characteristic for larger retailers. A single storey façade on a large anchor store would look very incongruous and not provide the street presence that such an important building needs.

Section 3.3- Urban Grain

Direction and human scale - We do not support the statement that, 'apartment blocks should be designed in a similar way to houses wherever possible. Individual entrances to ground floor apartments, as well as a vertical expression in the design of facades and windows will assist with giving the impression of a fine grain.' The requirement for apartment blocks to be designed in a similar way to houses will only be appropriate on small scale and mid-rise developments and would not be an appropriate design solution for taller and high density buildings.

Section 3.6- Materials

The SPD discourages materials such as concrete, metal and predominantly glass facades and states that concrete and render are known to become unattractive because of weathering and should be avoided externally. However, similarly it can be argued that the use of glass, metal and concrete on façades can be appropriate and provide a high quality finish and appearance, such as Brent Civic Centre. This section should be revised to appreciate that concrete, render and glass can be used in buildings if designed to a high standard and used appropriately.

	<p>Section 4.1- Block structure and active frontage Non-residential uses – We appreciate the ambition to have active frontages surrounding ‘big box’ retail but the SPD needs to recognise the difficulties in achieving this with regards to servicing and accessing requirements and the fact that, the provision of small retail units/kiosks will often not be commercially viable.</p> <p>Section 4.5- Public Realm Within Section 4.5 of the SPD, an additional reference should be made to the requirement for public seating to be provided at intervals of every 50 metres to ensure accessibility requirements are considered and provided within all new developments.</p> <p>Section 5.2- Private Outdoor Space We support Brent’s statement that “private and communal amenity space should be provided in accordance with the Mayor’s latest guidance” however the reference to Brent’s adopted guidance and in particular the DMP requirement to provide 50sqm of external amenity space for family housing and 20sqm for other flats needs to be reviewed in light of the Borough’s new housing targets and the changing expectations of many households. As experienced when developing sites in Wembley, all of which are considered to demonstrate good and innovative examples of how private and communal amenity space can be provided, it has been very challenging to meet Brent’s current standards. Furthermore, it is unrealistic to expect that these standards will be achieved for all units if Brent is to meet its housing targets.</p> <p>Section 6.1- Building for Life The SPD states that development should perform positively against the recommendations set out in the latest Building for Life (BfL12) guidance. As stated within the guidance, the core focus for BfL12 is developments between 25-50 homes per hectare. Whilst there are supplementary design prompts for more urban locations (classified as 3 or more storeys) we do not consider BfL12 is appropriate for the majority of new developments that will be coming forward within Brent, the vast majority of which must and will be at a far more dense and urban scale than 25-50 homes per ha.</p>
Officer Response	<p>Noted. Elements of support welcomed.</p> <p>Detail – The SPD is considered to concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area. The detailed supporting text is considered necessary to achieve the design principles and quality required, as per NPPF, London Plan and Brent policies. The guidance is required to judge the developments on, a case-by-case basis. The SPD is considered to describe what is required when, where and why and worded flexibly where appropriate. The NPPF requires developments to “respond to local character and history, including the surrounding built environment and landscape setting”. Likewise, the London Plan requires development to “respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality”. The SPD describes areas where new character, including tall buildings, can be appropriate. The Tall Building Strategy and new Local Plan will provide more detail on this. We can include another reference to Local Plan site allocations in the introduction.</p> <p>Principles and Paragraphs – The principles and sub-elements are numbered in the checklists, but can also be numbered within the chapters. Together with chapter numbers, paragraph numbers and page numbers this should be sufficient, in the interests of layout and readability.</p> <p>Images – The images have been carefully selected to clearly illustrate the relevant development principles and consist of a mix of scales and styles, representative of those within the borough, depicting various aspects of design quality or lack thereof as relevant.</p> <p>Viability Impact – It is considered that good quality design as described is viable and essential. Viability assessments may be necessary on a case-by-case basis. The emerging new Local Plan will be subject to a full viability analysis.</p> <p>Context and character – The document cannot go into the detail of describing or listing all sites within the borough. The upcoming Characterisation Study, and Local Plan with site allocations will assist with identifying character, although each development and its local character will be assessed on a case-by-case basis.</p> <p>Density, height and massing – The Tall Building Study aims to identify appropriate sites for tall buildings. It will be published alongside the emerging Local Plan. It will take into account PTAL and character. The reference to the Tall building guidance will be updated to the latest version (2015). Any new policy on tall buildings will be included in the Local Plan. The definition of a tall building always has to be based on the local context. In the example of continuous 2 storey housing, a building below 30m can indeed be considered tall. What constitutes significant will be judged on a case-by-case basis.</p>

	<p>Urban Grain – In areas where a new character can be appropriate, the new character will still benefit from the visual advantages of a finer grain and breaking up large building blocks effectively. The reference to houses relates to layout and access and vertical expression and is noted to only apply where possible. This is considered a good design principle that relates to massing and active frontage.</p> <p>Materials – Due to the poor weathering of concrete it is not considered an appropriate material for external facades. The extensive use of glass can also be inappropriate, as explained in the sections on proportions and massing.</p> <p>Block structure and active frontage – the opportunities and needs for wrapping active frontage will be judged on a case-by-case basis.</p> <p>Public realm – The need for public seating will change per location and seats every 50m are not considered necessary or viable throughout the borough.</p> <p>Private outdoor Space – The amenity space requirement for family housing is a Local Plan policy, simply repeated in the SPD. It is considered reasonable to ensure family sized dwellings are suitable for long term occupation by families with children.</p> <p>Building for Life – Building for Life principles are generic and equally relevant for higher density developments.</p>
Recommendation	<p>p.3: "This Design Guide explains what is required to comply with various policies within the Local Plan and will be adopted as a Supplementary Planning Document. Planning applications in the Borough will be assessed against it to ensure the design principles have been met. <u>Local Plan site allocations may provide specific design guidance or advice.</u>"</p> <p>p.4: "development will take appropriate cues from its surrounding area, including form, style and materials. Scale and height needs to <u>respect the relationship positively respond to adjoining areas' of established character and distinctiveness.</u> For larger scale planned regeneration of extensive areas, like the Wembley Park masterplan and parts of the Alpertown masterplan, a new urban character can be created <u>while drawing on the existing context and historic character and ensuring it is coherent with the townscape surrounding it.</u>"</p> <p>p.6: "Principle: New development, height, massing and façade design should <u>generally-respect positively respond to</u> the existing context and scale; facilitating good urban design."</p> <p>p.6: "and other policies and guidance including 'Historic England Advice Note 4; Tall Buildings' Design Council CABE's Guidance on Tall Buildings (2007)."</p> <p>p.7: "Heights on all other sites: Building heights should <u>fit in with positively respond to</u> existing character."</p> <p>p.7: "In all other areas, development should <u>fit in with positively respond to</u> its context and create attractive streets and spaces by respecting human scale in its ground floor treatment, height and massing. In the drive for efficient use of land, sensitive design should ensure new development <u>does not look out of place or overly change respects</u> the character of the wider surroundings. This includes <u>limiting carefully considering building heights and massing and designing blocks and buildings to reduce</u> minimise any negative visual impact."</p> <p>p.7: "In the areas of Brent that are more <u>predominantly</u> suburban in character, new tall buildings are unlikely to be appropriate."</p> <p>p.7: "New development should <u>respect positively respond to</u> the height of adjoining buildings and local area. Building heights that are out of context and <u>fail to fit in with do not respond positively to</u> local character are not acceptable."</p> <p>p.7: "Any 'landmark' buildings should make positive contributions through exceptional design and detailing, <u>rather than not necessarily</u> through increased height."</p> <p>p.7: "as outlined in the Urban Design Compendium-(HCA)."</p> <p>p.7: New images</p> <p>p.14: "Density, height and massing - New development height and massing should <u>generally-respect positively respond to</u> the existing context; facilitating good urban design"</p> <p>p.14: "b. Do building heights <u>fit in with positively respond to</u> existing character, <u>limit increases in</u> sensitively consider height and step down effectively?"</p>
Respondent	Woodland Trust

Response	<p>The Trust welcomes and supports Brent's commitment to the protection of trees and desire for more street trees in the Brent Design Guide. The pictures and text you have added since the 2017 draft are most welcome, but I would suggest that the title of Section 4.3 is widened out to cover all trees in a development, not just street trees. As I suggested in the 2017 consultation, I would recommend a new introductory paragraph as follows:</p> <p>"There is now a wealth of evidence on the many benefits of high tree canopy cover, including improving: physical and mental health; air quality; water quality; water management (reducing flooding); shading; cooling through evapotranspiration; as well as the more obvious benefit of improving biodiversity. Larger forest type trees provide greater benefits and older trees generally support more biodiversity."</p> <p>Practical guidance and references - In your consultation statement for the 2017 consultation, in your response to my submission, Brent agreed that "Guidance documents can be included in the guidance references section." However, I note the documents I suggested are not in Section 6.3. I'd therefore recommend that the following references are added to 6.3 in the box "Good Practice Publications":</p> <p>Residential Development and Trees (Woodland Trust, 2015) www.woodlandtrust.org.uk/publications/2015/07/residential-developments-and-trees/ ; BS 5837: 2012 Trees in relation to design, demolition and construction. If you have space I'd also suggest you include: TDAG's Trees in the Townscape and Trees in the Hard Landscape</p>
Officer Response	Noted. Support welcomed. We can include text and references as suggested. The tree officer also provided input into recommendations below.
Recommendation	<p>p.19: <u>"Street trees - Principle: New development should provide suitable street trees to new streets and spaces and retain existing trees where possible. There is now a wealth of evidence on the many benefits of high tree canopy cover, including improving: physical and mental health; air quality; water quality; water management (reducing flooding); shading; cooling through evapotranspiration; as well as the more obvious benefit of improving biodiversity. Larger forest type trees provide greater benefits and older trees generally support more biodiversity. There will be a presumption in favour of the retention of trees of a high and moderate quality. Where it is agreed not to be possible to retain such trees then measures should be taken to provide adequate space elsewhere on site for suitable replacement planting. Developers will need to demonstrate that they have provided sufficient space below ground to provide adequate rootable soil volume for the tree(s) to reach their optimal size and life expectancy as well as suitable set back to allow for the tree to grow in its natural form. Sustainable drainage systems and other green infrastructure benefits can also be designed into tree planting schemes, further enhancing the positive impact of an arboreal landscape...Indicative trees within private gardens that would not be provided by the developer should not be included on plans or proposals."</u></p> <p>p.34: <u>"Residential Development and Trees (Woodland Trust, 2015) ; Trees and Design Action Group (TDAG.org.uk) publications:</u></p> <ul style="list-style-type: none"> - <u>Trees in the Townscape</u> - <u>Trees in Hard Landscapes</u> - <u>Species Selection for Green Infrastructure"</u>
Respondent	John Cox
Response	<p>(1) Change references from 'tarmac' to 'asphalt'</p> <p>(2) Require large-scale developers at public consultations to document their consideration of 'alternatives at a formative stage' (the Supreme Court phrase) even if one specific design is being promoted. These should also be documented in their planning application material</p> <p>(3) Make a distinction somewhere between:</p> <ul style="list-style-type: none"> - welcoming distinctive and even custom-manufactured materials on permanent work, like brickwork of structures, but - acknowledging that long-term maintenance of hard surfaces and other periphery area need generic materials, given the likelihood of breakages and vandalism, and the need for piecemeal replacement over the following years.
Officer Response	<p>1) Following consultation with Highways, the references to tarmac/asphalt will be omitted.</p> <p>2) The focus should be on the proposed scheme in its final form.</p> <p>3) The SPD is not seeking custom-manufactured materials, but merely 'generic' paving of high quality, as described, which can easily be removed and re-laid after maintenance.</p>
Recommendation	Remove references to tarmac.

Previous Consultation Responses and Changes

Consultation responses to the previous public consultation in 2017 and subsequent changes made to the document are set out below.

Respondent	Natural England
Response	<p>Advise to consider the following:</p> <p>Biodiversity enhancement This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p> <p>Landscape enhancement The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.</p> <p>Protected species Natural England has produced Standing Advice to help local planning authorities assess the impact of particular developments on protected or priority species.</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p>
Officer Response	<p>Biodiversity: new guide to include guidance on trees, green front gardens and roof gardens. Landscape: new guide to include guidance on green and blue infrastructure and character, including townscape. Protected species and SEA regulations noted.</p>
Recommendation	Amend guide to include biodiversity and landscape guidance.
Respondent	GVA
Response	<p>We write regarding the 'Draft Brent Design Guide Supplementary Planning Document (SPD 1)' consultation currently being undertaken by London Borough Brent (LBB). This representation is in support of the draft document and is on behalf of our client, Regent Land & Development Ltd, who hopes to bring forward the redevelopment of a number of sites within the Borough.</p> <p>The purpose of this representation is to outline our support for a more flexible interpretation of design, as well as the recognised need for different design approaches in "transitional" and "transformational" areas, as outlined in the draft document. We subsequently consider that the Draft SPD1 is more supportive of growth than the existing 'Design Guide for New Developments (SPG 17)', which will be revoked. A summary of the key principles which we support is provided below.</p> <p>□ Section 4.1.1 Bulk, Scale and Mass – we welcome the encouragement of denser forms of development in transitional and transformational areas, subject to high design quality. We also support a flexible stance towards overlooking, overshadowing and daylight and sunlight, provided that the development does not result in a severe impact on neighbouring residential amenity. We consider that this flexibility is necessary where sites are highly constrained and any impact on residential amenity is offset by other regeneration benefits.</p> <p>□ Section 4.1.2 Height – the identification of transitional and transformational areas as potentially suitable locations for a tall building is welcomed. Notwithstanding this, we consider that the bullet point "Opportunities for buildings above 30 metres will be found in transformational areas" is overly restrictive and contradicts previous points relating to site context. We therefore seek the removal of this bullet point.</p> <p>□ Section 4.1.3 Privacy – we support a less rigid application of the Council's minimum separation distances in transitional and transformational areas, subject to good design and an acceptable impact in relation to overshadowing, daylight and sunlight. We appreciate the recognition that other design measures can also successfully contribute to preserving neighbouring residential amenity.</p> <p>□ Section 4.1.4 Amenity Space – the adoption of a more flexible stance towards Brent's Policy DMP 19 is welcomed, particularly where 20 sqm of external amenity space per flat is sought. We</p>

	<p>consider that it is often not feasible to meet this target where a high density flatted form of development is proposed. Notwithstanding this, recent consents in Brent demonstrate that a lower provision of amenity space has been considered acceptable where the amenity space is viewed as high quality.</p> <p>In summary, we welcome the Council's decision to update their residential design guidance in light of new national and regional policy, as well as changes within the Borough. We strongly support the need for more site-specific design guidance and consider that this will assist in driving growth and regeneration and raising the quality of development in Brent.</p>
Officer Response	<p>Support welcomed. Guidance will continue to be flexible, site-specific and based on local context and character.</p> <p>Bulk, scale and mass: Principle remains to optimise development potential, subject to context, character and design.</p> <p>Height: As above, opportunities for height are based on the local context and local policies. Specific opportunities for tall buildings and specific design principles will be identified in the forthcoming Tall Building Strategy and Local Plan site allocations.</p> <p>Privacy: Flexibility in terms of privacy and amenity will be retained.</p>
Recommendation	No change
Respondent	Historic England
Response	You may be interested to see the report recently published by Historic England 'Translating Good Growth for the Historic Environment'. This is on our website at: https://historicengland.org.uk/get-involved/protect/keep-it-london/
Officer Response	Noted
Recommendation	No change
Respondent	Woodland Trust
Response	<p>"Planting and Trees</p> <p>There is now a wealth of evidence on the many benefits of high tree canopy cover, including improving: physical and mental health; air quality; water quality; water management (reducing flooding); shading; cooling through evapotranspiration; as well as the more obvious benefit of improving biodiversity. Larger forest type trees provide greater benefits and older trees generally support more biodiversity."</p> <p>I was pleased to note the need to retain trees, but this could be strengthened with specific reference to BS 5837: 2012 <i>Trees in relation to design, demolition and construction</i>.</p> <p>Furthermore, I would suggest strengthening the third bullet point in "<i>Loss of Existing Trees</i>" as follows (addition in red): "Where it is agreed that trees may be removed, then measures should be taken for their replacement of an appropriate type and size within the site that would replace the volume of lost canopy cover with immediate effect."</p> <p>Practical guidance and references</p> <p>The Woodland Trust is a member of the Trees and Design Action Group (TDAG) - a unique multi-disciplinary group of professionals and organisations from both the private and public sectors that is seeking to promote the benefits of trees within the built environment. TDAG published <i>Trees in the Townscape</i> This contains 12 principles of best practice aimed at designers, developers and planners to encourage integrated, joined up thinking, strategies, policies and implementation relating to trees in the urban realm. TDAG have also recently published a practical guide for the retention and planting of trees in urban situations, including new development - <i>Trees in the Hard Landscape</i></p> <p>TDAG publications are referenced in the London Plan, and <i>Trees in the Townscape</i> is endorsed by a number of local authorities; therefore, I recommend that Brent Council considers referencing TDAG guidance, as well as the Woodland Trust's <i>Residential Development and Trees</i> report, in its Design SPD.</p>
Officer Response	Noted. Reference to removal of trees to be removed. Guidance documents can be included in the guidance references section.
Recommendation	As above
Respondent	Sports England
Response	Sport England recommend that the Draft Brent Design Guide Supplementary Planning Document has clear references to Active Design, its principles and the Active Design Checklist to inform development proposals. This would build upon the reference to Public Health England and the TCPA document referred to on page 6 of the Draft Design Guide. In regard to the Active Design Checklist, there could be a requirement for any development proposal coming forward to have it assessed in line with the checklist to ensure that proposals can really have a positive impact on the health of a community. More information on Active Design, including the guidance and checklist, can be found via the following link; http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/
Officer Response	Noted. Guidance documents can be included in the guidance references section.
Recommendation	As above
Respondent	Zerine Tata
Response	Further to your email of 3rd July 2017, I would like to inform the Council that the single most thing

	<p>which worries the residents of Wembley is the increase in higher rise buildings. The Regeneration of the Stadium and Wembley High Road areas are very reluctantly being accepted by the residents, but that is not to say we are at all happy about it. What we find very difficult to accept and what makes us really angry is the Council passing planning applications for higher rises, which are outside of the "Regeneration" areas and encroach on purely residential areas of houses, bungalows, maisonettes and small blocks of flats. Any blocks of flats in these areas should not be taller than the houses around them, which normally would be three floors including the ground floor. Throughout the borough, there are many brown filled sites and sites with existing derelict high rises on them, such as the ones on the corner of Harrow Road and North Circular, which can be developed into higher rises. There are two high rises which have been derelict for decades, when are they going to be developed? There is absolutely no need to ruin residential neighbourhoods by allowing developers to build higher rises, such as the redevelopment of Heron House on Wembley Hill Road, with the possibility of another high rise opposite at St Joseph's Social club which has also been purchased by the same developer. To have yet another two higher rises each on either side of Wembley Hill Road, right next to the "Regeneration" area would be unjustified and cause great anger and disappointment amongst all the residents living in the areas, who have already had to suffer all the disadvantages of having so many high rises in the Regeneration areas. We all hope that the Council Planning department will look more considerately at all planning applications for high rises and take some account of the wishes of the residents.</p>
Officer Response	<p>Noted. High rise buildings will need to respect the local context and only occur in sites identified as appropriate for tall buildings in Local Plan policies, site allocations and adopted masterplans including the Wembley Area Action Plan. The forthcoming Tall Building Strategy will identify sites and further design principles and will be reflected in the new Local Plan and Site Allocations.</p>
Recommendation	<p>Add further guidance and policy references in a tall building section.</p>
Respondent	<p>Gary Lawyer</p>
Response	<p>My biggest concern is not so much how many flats are being built, (though I wholeheartedly agree with your views Zerine) but the actual infrastructure that is not being updated / adapted to suit the additional thousands of new residents coming into the area. On a Saturday afternoons the Harrow Road from the A406 towards Wembley is one continual queue due to LDO shoppers, this is of course compounded by locals trying to go home! To relieve some of the queues, it would make sense to lift the time restrictions on the bus lanes to peak times only to allow traffic to flow that more easily, plus encourage people to return to the LDO instead of saying never again! I am all for one for traffic control but with another 5,000 homes planned between now and 2020 (from wembleypark.com) this problem is going to manifest into complete shutdown. With 1,000's of new jobs created, PLUS 1,000's of new residents (11,500 total flats envisaged if I am not mistaken in total) it does not take long to work out the additional traffic and people movements each and every day, on top of those visiting the stadium, LDO and SSE arena. We as locals are used to avoid peak times on event days, but it could potentially be that every day could be like an event day with the amount of additional people coming / leaving the area each day. If each flat houses 3-4 people, that is 34-46,000 people, if a quarter of those use a car that is almost 12,000 additional car movements each day. If half go to the school or work that is around 20,000 people movements each day. This is every day, and excludes LDO shoppers and employees! I have also noticed the re-timing of the traffic lights since the LED types have been installed these have compounded the problem! A total re-think of the Harrow Road, and A406 trunk roads needs to be carried out. I know parking restrictions for event days are in place to encourage people to use public transport but we are not talking about event days, but each and every day.</p> <p>SOLUTION: Have Park and Ride schemes been considered? Bicester village and many others have such a scheme which eliminates traffic problems in the village yet gets shoppers into the shopping areas quickly and safely. The two high rises at the Harrow Road / A406 junction have (as Zerine rightly states) been empty for many years and is the first thing that new shoppers see when visiting Wembley! If these two monstrosities were two multi storey car parks with a Park 'n Ride scheme (with a minimal cost to the customer) it would eliminate the vast majority of congestion on the Harrow Road at a stroke! The scheme would be open for shoppers as well as football / concert goers and would enable traffic to disperse EASILY and QUICKLY at the end of a match or concert instead of all the road closures and coned re-directions that currently happens and make traffic dispersal ten times worse! If people paid less for this scheme than parking in the car parks nearer to the "event" then this would encourage people to use it. I am sure that there would be many companies willing to sponsor the scheme also thus bringing in even more revenue! I am confident that not only would this suggestion work, it would greatly improve the A406/Harrow Rd junction as well as encouraging people to return! I have thought about this idea for a long time and would like to think that someone somewhere within the Council will put it forward for consideration, something needs to be done, and this is something that could work!</p>
Officer Response	<p>Noted. Decisions on specific site-related transport improvements are not within the scope of the design guidance document.</p>
Recommendation	<p>No change</p>
Respondent	<p>TfL</p>

Response	<p>I can confirm that the guidance set out in the document is broadly in line with the strategic transport policies of the London Plan. However, the Council is encouraged to maintain a constrained approach to car parking. Additionally, measures which promote the uptake of cycling and walking and help to deliver the Healthy Streets approach set out in the draft Mayor's Transport Strategy, should be integrated into the design of all new development. Of particular relevance is TfL's Streetscape Guidance and the London Cycle Design Standards (LCDS) in relation to cycle parking design.</p> <p>4.14.1 Residential Parking</p> <p>TfL welcome that developments which propose large areas of hardstanding and marked out spaces will be discouraged. 'Home Zone' parking areas are to be encouraged as an alternative, with measures to reduce vehicle speeds proposed to be integrated into design. The SPD should also investigate how design can encourage pedestrian and cycle trips as part of a wider modal shift from private vehicles to sustainable and active modes of transport.</p> <p>4.14.2 Retail and Office Parking Areas</p> <p>TfL would like to this opportunity to remind Brent Council to ensure that parking for bulk retail and offices uses should be kept to a minimum. Travel to and from such uses should be encouraged to take place via sustainable transport modes.</p> <p>4.15 Cycle Parking & Storage</p> <p>Cycle parking should be provided in line with London Plan standards, and be in accordance with the London Cycle Design Standards (LCDS) in regard to overall design, location, style and access. This may encourage the uptake of cycling as an attractive alternative to private car use.</p>
Officer Response	Noted. Car-free development will be mentioned. Shared space, including Homezones, will be encouraged. The draft London plan policies, based on TfL's guidance and LCDS, will be referenced.
Recommendation	As above
Respondent	Manish Bakhda
Response	<p>I wish to comment and request changes to section 4.13 of the draft. Currently, the draft mentions no guidance on building close to existing mature trees. In essence it does not prevent planning approval of new developments that are unreasonably close to existing trees. The risk of fire spreading across a proposed development via the proximity to existing trees has been overlooked. Hence whilst it is possible to build within inches of existing trees using pile foundations, it does not mean that it is safe to do so from a fire risk perspective or from a storm risk perspective (where the risk arises from falling branches or the tree itself onto the proposed buildings in storm conditions). I strongly believe this is an oversight in the draft (which I suspect was written before the Grenfell fire and before the heightened concerns on fire risk in public buildings). I would kindly request that a table of recommended minimum distances from existing mature trees be included in the final Design Guide. Clearly, the distances would depend on the type of trees and height of buildings. I have attached an example from another borough as a guide to illustrate. A new section could be added to the Design Guide and called something like "Distances to existing trees". I would be grateful if you could kindly point me to Brent's existing planning guidelines on new developments close to trees. Is there a similar document or guidance on minimum distances to existing trees that planning currently use?</p>
Officer Response	Noted. Fire regulations are not within the scope of the design guidance document. New trees are not considered to pose increased fire risk. The condition of old trees may be assessed by tree officers and if they are deemed to pose danger then appropriate action will be undertaken.
Recommendation	No change
Respondent	Network Rail
Response	<p>Network Rail would request that there is a minimum 2 metres gap between buildings and structures within a proposal area and the railway boundary; this should be 3m if the proposal area is adjacent to the 25kv overhead power lines. Less than 2m (3m) from the railway boundary to the edge of structures could result in construction and future maintenance works being undertaken on Network Rail land. This would not be acceptable. All the works undertaken to facilitate design and layout of proposals should be undertaken wholly within an applicant's land ownership footprint.</p>
Officer Response	Noted. This level of detail is not considered appropriate for this general guidance document. A strong emphasis on site-specific design and local context will be included in the document. Network Rail may provide comments to specific applications where relevant.
Recommendation	No change
Respondent	Terence O'Rourke
Response	<p>Sections 1 and 2: Introduction and Good design in existing policy context</p> <p>1. St George Developments Ltd (St George) aims to achieve the highest standard of design and public realm in all its developments which are distinctive in the market place. St George supports the Council's decision to prepare a Design Guide to promote best practice and to assist in the achievement of high quality design in the borough, and believes that it could be a very useful tool for both the Council and applicants.</p> <p>Section 3: Design approach – using the guide</p> <p><i>Paragraph 3.1.3 Transformational areas</i></p>

2. St George is supportive of the approach outlined in paragraph 3.1.3 in relation to development area typologies and recognition of *'Transformational'* areas. These are defined as *'the larger scale planned regeneration of extensive areas...for example the Wembley Park masterplan'*. The reference to Wembley Park is helpful but further clarity of the areas that the Council considers to be *'transformational'* would be useful. Along with Wembley Park, Alpertion is one of only two Housing Zones within the Borough and is the subject of a comprehensive master plan to bring about the large scale regeneration of the area. To be consistent, St George suggests that both Alpertion and Wembley Housing Zones should be referred to within the definition of transformational areas.

3. In transformational areas, the Council recognises that *'a more flexible interpretation towards design responses will be accepted'* as well as *'having greater scope for flexibility on issues such as separation and other standards.'* The Council's approach to transformational areas is entirely supported and appropriate given their scale, complexity and the need to make a positive contribution to the wider regeneration of the Borough.

Paragraph 3.2.2 Presentation standards and consultation

4. The Draft Design Guide states that *'for outline applications, design codes for major developments such as elevation detailing should be included.'* St George is supportive of the use of design codes to ensure a consistent standard of design is applied. It is considered however that design codes should be prepared at conditions stage rather than at outline application stage to reflect the fact that the detailed design approach is often set by the first Reserved Matters submission.

5. In addition, the Guide outlines that for full applications, architect's drawings should ideally be to RIBA Stage 4. While St George appreciates the intention of the Council to require more detailed drawings at an earlier stage of the process, St George supports RIBA Professional Guidelines which require drawings up to RIBA Stage 3, and consider RIBA Stage 4 unnecessary on this basis. This will also reduce the need for Non-material Amendment and Minor Material applications at a later stage.

Section 4 Design Guide

Paragraph 4.1 Design and layout

6. The approach to the transformational typology areas has not been applied consistently through the document, having only been applied to those design criteria up to Paragraph 4.2. The current Draft Design Guide distinguishes between the typologies and acknowledges there to be greater flexibility with regard to the following in transformational locations:
Bulk, scale & mass; Height; Outlook; Amenity Space; Balconies and; Roof terraces.

7. This greater level of flexibility for transformational areas is supported. *Paragraph 4.2 – 4.16 Non-designated heritage assets, Building typologies etc.*

8. However, from paragraph 4.2 of the Draft Design Guide, it is noted that *'the following sections are applicable of all types of development in Brent.'* This specifically relates to the following:
Non-designated heritage assets; Building Typologies, Shared Surfaces, Relationship of buildings & entrances to public areas, Affordable Housing Design, Residential Density, Secured by Design, Residential quality, Elevations, Frontages and Access, Materials, System Build; Environmental; Noise; Landscape; Parking; Cycle parking & storage and; Waste recycling & storage.

9. The unique nature and scale of transformational areas requires a bespoke design approach to achieve the highest quality of place which is contingent on flexibility being applied when considering applications. This applies to the matters cited above. St George believes that the inherent flexibility required for these areas is an important consideration.

Paragraph 4.7 Residential density

10. The draft guidance states that *'the Council will take a positive approach to allowing the efficient use of land and above the density levels identified in the matrix (London Plan Housing SPG) provided the quality of the development and its characteristics will support high amenity for its occupants and will not unacceptably undermine those of the neighbouring area.'* St George welcomes and supports the efficient use of available land to facilitate housing delivery in the borough and promoting higher densities where appropriate and supported by high quality design.

11. This is reflected in the Housing White Paper published by the Department for Communities and Local Government entitled 'Fixing our broken housing market' (February 2017) which sets out the future direction of national planning policy. This highlights that *'not all development makes good use of land, especially in areas where demand is high and available land is limited. London, for example, is a relatively low-density city especially in its suburbs.'* The Housing White Paper (Paragraph 1.51) outlines that amendments to the National Planning Policy Framework (Paragraph 1.53) will seek to *'address the particular scope for higher-density housing in urban locations that are well served by public transport (such as around many railway stations).'* Transformational areas are clear examples of locations deemed appropriate for higher densities of development and more efficient use of land in order to optimise housing delivery.

Paragraph 4.9 Residential internal areas

12. Whilst Paragraph 4.9 refers to an endorsement for *'new development and residential conversions and standards in the Mayor's Housing SPG'*, the Draft Design Guide contains the following additional requirements:
- *'The number of units per core and storey may not exceed 8 in order to encourage neighbourly*

interaction and occupier ownership;

- *Internal communal corridors will be 1.5 metre wide minimum, have windows which open to promote cross ventilation and maximise daylight;*
- *The design must maximise dual aspect units (with a target of achieving more than 50% across the site) and limited the number of single aspect units;*
- *The design must seek to avoid north facing single aspect units.'*

13. In relation to the recommended number of homes per core referenced in Paragraph 4.9, St George is supportive of the wording contained in Standard 12 of the Mayor's Housing SPG where it states that *'each core should be accessible to generally no more than eight units on each floor'*. This allows for an element of flexibility where site constraints require a bespoke design approach. There may be instances, for example to accommodate a greater number of smaller homes around a core, where it is desirable to include more homes than 8 around a single, or connected cores. The wording contained in the Draft Design Guide however, does not allow for this flexibility.

14. Paragraph 4.9 outlines that *'internal communal corridors will be 1.5m wide minimum, have windows which open to promote cross ventilation and maximise daylight.'* St George is supportive of the wording contained in the Mayor's Housing SPG which states *'where dwellings are accessed via an internal corridor, the corridor should receive natural light and adequate ventilation where possible.'* This allows for flexibility where required to achieve high quality development, and should also be reflected in the Draft Design Guide, particularly in transformational areas.

15. Similarly, Paragraph 4.9 of the Draft Design Guide states that where possible *'the design must maximise dual aspect units (with a target of achieving more than 50% across the site).'* St George is supportive of the Council's approach outlined in Paragraph 4.7 where it suggests that *'the Council will take a positive approach to allowing the efficient use of land.'* The Mayor's Housing SPG acknowledges in paragraph 2.3.40 that there may be situations where single aspect dwellings are appropriate such as to achieve an active frontage on an existing north facing street. St George recommends that a similar acknowledgment is made in the Draft Design Guide, particularly in relation to transformational areas.

16. St George is supportive of the flexible approach to be applied to transformational areas consistent with the approach set out in Paragraphs 4.1 to 4.2 of the Draft Design Guide. St George considers that this should also apply to the standards cited in Paragraph 4.9. The nature of transformational areas is that they are often complex with a range of constraints, thus requiring pragmatism in producing high quality design solutions.

17. The Mayor's Housing SPG refers to the need to optimise housing potential where *'optimisation can be defined as developing land to the fullest amount consistent with all relevant planning objectives.'* Furthermore, it is highlighted that *'the London Plan includes a density matrix as only part of a wider policy to optimise development on sites in different settings, with different levels of public transport and accommodating homes of different sizes. The density ranges are sufficiently wide to accommodate the spectrum of policy considerations which must be taken into account when optimising development at a particular location.'*

18. In optimising the potential of transformational areas, there is an overriding need to produce a high quality design which reflects the individual characteristics of these areas. St George endorses high quality design through the adoption of best practice design standards but there needs to be a recognition that transformational areas in particular require a slightly different treatment to achieve wider place making objectives. A degree of flexibility may therefore be required to accommodate the complexities of individual sites in these locations.

19. In applying the density matrix contained in Policy 3.4 and Table 3.2 of the Mayor's Housing SPG, the SPG notes that these standards *'should be used as a starting point and guide rather than as an absolute rule so as to also take proper account of other objectives, especially for dwelling mix, environmental and social infrastructure, the need for other land uses (eg employment or commercial floorspace), local character and context, together with local circumstances, such as improvements to public transport capacity and accessibility. The London Plan is clear that the Sustainable Residential Quality (SRQ) density matrix should not be applied mechanistically, without being qualified by consideration of other factors and planning policy requirements.'*

20. In summary, the London Plan and Mayor's Housing SPG recognise that whilst design standards provide a helpful platform, there are different approaches to achieving high quality design which require a degree of flexibility. The nature of transformational areas is that they often have unique characteristics that require a tailored and innovative design response that does not compromise design quality in the process. St George is supportive of this approach and consider this similarly applies to the standards cited in Paragraph 4.9.

21. Paragraph 58 of the **National Planning Policy Framework** which outlines the need to *'optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and other transport networks.'* In this context it is important that detailed design guidance strikes the right balance in order to accommodate development which makes efficient use of brownfield land, optimises housing delivery and the creation of high quality homes and public spaces. The application of additional prescriptive standards as presently contained in

	<p>Paragraph 4.9 does not reflect the approach to design and development outlined in the Mayor's Housing SPG, the London Plan and the National Planning Policy Framework.</p> <p><i>Paragraph 4.10 Elevations, frontages and access</i></p> <p>22. In relation to active frontages, the Draft Design SPD states that <i>'active frontage must be maximised with no more than 20% of the total frontage (max. of 15 metres) on each side of a perimeter block or development or to be inactive.'</i> St George supports the principle of active frontages. It is suggested that the wording of the Guide could be refined to <i>'target no more than'</i> rather than <i>'with no more than'</i> to allow for bespoke design solutions which may be required to accommodate specific site constraints in transformational locations.</p> <p><i>Paragraph 4.13.4 Landscape</i></p> <p>23. St George supports a design approach which provides areas of high quality, varied and multifunctional public open space as well providing valuable open space for existing communities, with a clear focus on the needs of new residents. St George considers that recognition should be made within the Draft Design Guide to the balance between the provision of public open space and equally the provision of private amenity space.</p> <p>24. The Draft Design Guide outlines that <i>'front gardens would not normally account for amenity space if their purpose is also to provide defensive space.'</i> St George remains committed to providing high quality and well-designed front gardens which share a clear language of hard and soft materials and suggests that front gardens can provide high quality amenity space. It is recommended that greater flexibility should be allowed to the contribution front gardens make to amenity space based on their design.</p> <p>25. The Draft Design Guide states that <i>'the presumption is that in new development all existing trees (that are considered to be of sufficient quality) are retained.'</i> St George is committed to sustainable development and endeavours to retain existing trees wherever possible. This is not always possible and the Draft Design Guide should acknowledge where existing trees are of a poor quality that there is scope to significantly enhance the landscaping through the provision of new trees.</p> <p><i>Paragraph 4.14.2 Undercroft parking</i></p> <p>26. St George is supportive of paragraph 4.14.2, which states that <i>'undercroft parking will only be acceptable where active frontages and secured by design balanced with high quality design is employed.'</i> This promotes the efficient use of development land.</p> <p>Conclusion</p> <p>27. In conclusion St George welcomes the Council's new Draft Design Guide in principle but considers that some elements of the document are unduly prescriptive and inhibit the flexibility that it is vital for transformational areas.</p> <p>28. St George trusts that the above representations will be taken into account and will assist the Council in revising its Draft Design Guide and St George would be pleased to provide further clarification on any of the points raised in this response.</p>
Officer Response	<p>Support welcomed and noted.</p> <p>Transformational areas: Reference to these areas will be deleted to avoid confusion in identifying the locations of these sites and to avoid the creation of new planning policy. The guidance describing higher density developments will remain. A strong emphasis on site-specific design and local context will be included in the document.</p> <p>Presentation standards: It is the intention of the Council to require more detailed drawings at an early stage to aid the understanding of the implications of proposals sought at outline application.</p> <p>Design and layout: Design quality is sought equally for all types of development, including high density development. The description of guidance will aim to be relevant to various types of sites and development.</p> <p>Density: Reference to the London Plan density matrix will be removed. A strong emphasis on site-specific design and local context will be included in the document.</p> <p>Residential quality: the guidance proposed is deemed fair and necessary to achieve residential quality. Guidance may be applied flexibly if site-specific constraints require it. Flexibility is more likely to apply to small (infill) sites where only one design solution may be possible. Large sites have the flexibility to design for quality as sought by the guidance.</p> <p>Active frontage: The quantified limit of inactive frontage will be removed in the guidance, to focus on the 'target of' full active frontage.</p> <p>Landscape: The reference to front gardens as defensive space or amenity space will be removed from the document. Reference to unsuitable existing trees will be included.</p> <p>Undercroft parking: This type of parking is by definition inactive and incompatible with secured by design principles. This sentence will be removed to avoid confusion.</p>
Recommendation	Add strong emphasis on site-specific design and local context. Remove reference to density matrix and transformational areas. Amend text on active frontage, undercroft parking and front gardens.
Respondent	Gulfraz Qayyum
Response	<p>P9: 2:1 Rule</p> <ul style="list-style-type: none"> • The 2:1 Rule is an archaic and arbitrary rule which should be wholly dispensed with • Brent is the only council in the whole of the UK to adopt the 2:1 Rule

	<ul style="list-style-type: none"> • Brent is the only council out of the 34 councils in Greater London to adopt the 2:1 Rule • The gives rise to a “postcode lottery” and unfairly inhibits extensions for the residents of Brent. With the prohibitive costs of moving house and housing crisis, we should not be unduly restricting house extensions • This matter is particularly acute in Brent given the particular demographics e.g. ethnic minorities with a greater propensity for larger family sizes and greater incidence of cross generational cohabitation • There is no research basis for the 2:1 Rule and Building Research Establishment (BRE) does not endorse its use over the 45 Degree Rule P9: 45 Degree Rule • The 2:1 Rule should be replaced whole heartedly with the 45 Degree Rule instead of being tentatively introduced with so many subjective caveats and unclear and potentially conflicting statements that water down this otherwise sensible addition. For example, “45 degree angle <i>may</i> be acceptable if it compiles [sic] with daylight and sunlight studies” is not required • Please refer to BRE’s “Site layout planning for daylight and sunlight: a guide to good practice” which has extensive and universally accepted studies corroborating the use of the 45 Degree Rule without compromising amenity to light • Excluding Brent, 72% of all Greater London councils adopt the 45 Degree Rule. The rest do not preclude its use and nor do they use 2:1 as the starting basis • The Planning Advisory Service (PAS), advisors to local councils on planning matters, endorse the use of BRE guidelines • Another way of tackling any potential concerns is to adopt the 45 Degree Rule, but put the burden on the planners to argue if this would impact amenity to light, conflict with existing characteristics or result in excessive massing. Otherwise, the use of the ubiquitous 45 Degree Rule would unlikely to be fairly adopted in planning assessments P18: BRE • I welcome reference to BRE as “Brent’s preferred methodology”. However BRE stands for Building Research Establishment and not “Building Regulations Establishment” as has been noted
Officer Response	Noted. The Design Guide SPD1 is intended for new development. For residential extensions, SPD2 Residential Extensions and Alterations would apply. The BRE typo will be omitted.
Recommendation	Correct ‘Building Regulations Establishment’ typo to ‘Building Research Establishment’ in guidance references.
Respondent	Patrick O Connor, Willesden Green Town Team.
Response	<p>It would be helpful if the Design Guide provided guidance on the following areas:</p> <ul style="list-style-type: none"> - Satellite dishes & TV aerials: As a result of a denser housing population, there is a risk of more satellite dishes being installed. Outside of Conservation Areas, it would be helpful to include guidance on the location of the dishes and TV aerials, such as avoiding dishes being installed on the front of properties or TV aerials that are unusually tall. This would preserve (to an extent) the street scape. - Rubbish bins: Multi-occupied properties (such as period conversions) will require more rubbish bin storage. The Design Guide should provide guidance to factor this into the design of front areas to ensure that multiple bins are not an overbearing feature of the street scape. - Cycle parking: It would useful to include guidance or a requirement regarding the provision of cycle parking in front areas (where space permits).
Officer Response	These comments will be addressed in an amended section on bins and bike storage and services.
Recommendation	Include guidance on bins, bike parking and satellite dishes.
Respondent	Rob Murphy, AECOM
Response	So glad that you are looking at this, so often the wind comfort gets left off, then we end up with nasty, windy unused streets, or worse people getting blown off their feet, like the trouble at Bridgwater place up in Leeds. I guess this is only going to get more of an issue as buildings in London get taller. I agree that the BRE does often feel like the Building <i>Regulation</i> Establishment, but it’s probably worth a change to <i>Research</i> . I know the BRE have standards for Daylight and Sunlight mentioned in the bullet points to come, but for wind it’s really a Bristol Uni Method, I think this is the method that’s being proposed. I’ve seen it referenced as “Building Aerodynamics by Tom Lawson”.
Officer Response	Noted
Recommendation	Correct ‘Building Regulations Establishment’ typo to ‘Building Research Establishment’ in guidance references.