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 Draft 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.

Consultation

A previous draft version of the SPD1 has undergone public consultation from 6th July to 17th August 2017. However, significant changes have been recommended which mean that the document should 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 draft SPD1 will be better fit for purpose in guiding development to achieve high quality design.

The updated Draft SPD1 will undergo 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 will be 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 will be emailed and invited to comment
- the consultation will be publicised via social media

Any person may make representations about the guidance. Representations should be made by e-mail: planningstrategy@brent.gov.uk or by post: Spatial Planning, Brent Civic Centre, Engineer’s Way, Wembley, HA9 0FJ. The deadline for comment is 17:00 on 5th July 2018.
Next Steps

Following the close of the consultation this statement will be updated to include a summary of comments received and how this informed the finalised SPD. These comments together with any recommended changes to the Draft Brent Design Guide SPD (SPD1) will be presented to Cabinet for its consideration. The document will become adopted when approved by Cabinet. At this time SPG17 will be revoked.

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.

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Natural England</th>
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<tbody>
<tr>
<td><strong>Response</strong></td>
<td>Advise to consider the following: <strong>Biodiversity enhancement</strong> 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. <strong>Landscape enhancement</strong> 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. <strong>Protected species</strong> Natural England has produced Standing Advice to help local planning authorities assess the impact of particular developments on protected or priority species. <strong>Strategic Environmental Assessment/Habitats Regulations Assessment</strong> 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.</td>
</tr>
<tr>
<td><strong>Officer Response</strong></td>
<td>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.</td>
</tr>
<tr>
<td><strong>Recommendation</strong></td>
<td>Amend guide to include biodiversity and landscape guidance.</td>
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<table>
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<tr>
<th>Respondent</th>
<th>GVA</th>
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<tbody>
<tr>
<td><strong>Response</strong></td>
<td>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 &amp; Development Ltd, who hopes to bring forward the redevelopment of a number of sites within the Borough. 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. □ <strong>Section 4.1.1 Bulk, Scale and Mass</strong> – 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...</td>
</tr>
</tbody>
</table>

2
consider that this flexibility is necessary where sites are highly constrained and any impact on residential amenity is offset by other regeneration benefits.

- **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.

- **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.

- **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 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.

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.

### Officer Response
Support welcomed. Guidance will continue to be flexible, site-specific and based on local context and character.

- Bulk, scale and mass: Principle remains to optimise development potential, subject to context, character and design.
- 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.
- Privacy: Flexibility in terms of privacy and amenity will be retained.

### 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
“Planting and Trees
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.”

I was pleased to note the need to retain trees, but this could be strengthened with specific reference to BS 5837: 2012 *Trees in relation to design, demolition and construction.*

Furthermore, I would suggest strengthening the third bullet point in “Loss of Existing Trees” 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.”

Practical guidance and references
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 *Trees in the Townscape* 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 - *Trees in the Hard Landscape*

TDAG publications are referenced in the London Plan, and *Trees in the Townscape* 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 *Residential Development and Trees* report, in its Design SPD.

### 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/](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**

Add further guidance and policy references in a tall building section.

**Respondent**

Gary Lawyer

**Response**

Further to your email of 3rd July 2017, I would like to inform the Council that the single most thing 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, here are many brown filled sites and sites with exiting 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 resident living in the areas, who have already had to suffer all the disadvantages of having so many high rises in the Regenerations 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.

**Officer Response**

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.

**Recommendation**

As above

**Respondent**

Zerine Tata

**Response**

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 afternoon 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 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 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.

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
Proposals should be undertaken wholly within an applican Rail land. This would not be acceptable. All the works undertaken to facilitate design and layout of structures could result in construction and future maintenance works being undertaken on Network to the 25kv overhead power lines. Less than 2m (3m) from the railway boundary to the edge of within a proposal area and the railway boundary; Network Rail would request that Network Rail

<table>
<thead>
<tr>
<th>Officer Response</th>
<th>Noted. Decisions on specific site-related transport improvements are not within the scope of the design guidance document.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recommendation</td>
<td>No change</td>
</tr>
<tr>
<td>Respondent</td>
<td>TIL</td>
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</tbody>
</table>

Response

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 TIL’s Streetscape Guidance and the London Cycle Design Standards (LCDS) in relation to cycle parking design.

4.14.1 Residential Parking

TIL 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.

4.14.2 Retail and Office Parking Areas

TIL 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.

4.15 Cycle Parking & Storage

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.

<table>
<thead>
<tr>
<th>Officer Response</th>
<th>Noted. Car-free development will be mentioned. Shared space, including Homezones, will be encouraged. The draft London plan policies, based on TIL’s guidance and LCDS, will be referenced.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recommendation</td>
<td>As above</td>
</tr>
<tr>
<td>Respondent</td>
<td>Manish Bakda</td>
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</table>

Response

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?

<table>
<thead>
<tr>
<th>Officer Response</th>
<th>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.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recommendation</td>
<td>No change</td>
</tr>
<tr>
<td>Respondent</td>
<td>Network Rail</td>
</tr>
</tbody>
</table>

Response

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.
Sections 1 and 2: Introduction and Good design in existing policy context

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.

Section 3: Design approach – using the guide

Paragraph 3.1.3 Transformational areas

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, Alperton 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 Alperton 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;
- 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 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.

22. In relation to active frontages, the Draft Design SPD states that ‘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.’ St George supports the principle of active frontages. It is suggested that the wording of the Guide could be refined to ‘target no more than’ rather than ‘with no more than’ to allow for bespoke design solutions which may be required to accommodate specific site constraints in transformational locations.

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.

24. The Draft Design Guide outlines that ‘front gardens would not normally account for amenity space if their purpose is also to provide defensive space.’ 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.

25. The Draft Design Guide states that ‘the presumption is that in new development all existing trees (that are considered to be of sufficient quality) are retained.’ 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.

26. St George is supportive of paragraph 4.14.2, which states that ‘undercroft parking will only be acceptable where active frontages and secured by design balanced with high quality design is employed.’ This promotes the efficient use of development land.

Conclusion

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.

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.

Officer Response

Support welcomed and noted.

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.

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. 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.

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.

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.

8
Active frontage: The quantified limit of inactive frontage will be removed in the guidance, to focus on the 'target of' full active frontage.
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.
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.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>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.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>Gulfraz Qayyum</td>
</tr>
<tr>
<td>Response</td>
<td>P9: 2:1 Rule</td>
</tr>
<tr>
<td></td>
<td>• The 2:1 Rule is an archaic and arbitrary rule which should be wholly dispensed with</td>
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<tr>
<td></td>
<td>• Brent is the only council in the whole of the UK to adopt the 2:1 Rule</td>
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<tr>
<td></td>
<td>• Brent is the only council out of the 34 councils in Greater London to adopt the 2:1 Rule</td>
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<tr>
<td></td>
<td>• 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</td>
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<td></td>
<td>• 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</td>
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<td></td>
<td>• 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</td>
</tr>
<tr>
<td></td>
<td>• 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</td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>Correct ‘Building Regulations Establishment’ typo to ‘Building Research Establishment’ in guidance references.</th>
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<tbody>
<tr>
<td>Respondent</td>
<td>Patrick O Connor, Willesden Green Town Team.</td>
</tr>
<tr>
<td>Response</td>
<td>It would be helpful if the Design Guide provided guidance on the following areas:</td>
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<tr>
<td></td>
<td>- Satellite dishes &amp; TV aerials:</td>
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<tr>
<td></td>
<td>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.</td>
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<td></td>
<td>- Rubbish bins:</td>
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<td></td>
<td>Multi-occupied properties (such as period conversations) 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.</td>
</tr>
<tr>
<td></td>
<td>- Cycle parking:</td>
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<td></td>
<td>It would useful to include guidance or a requirement regarding the provision of cycle parking in front areas (where space permits).</td>
</tr>
</tbody>
</table>

Officer Response These comments will be addressed in an amended section on bins and bike storage and services.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>Include guidance on bins, bike parking and satellite dishes.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Respondent</td>
<td>Rob Murphy, AECOM</td>
</tr>
<tr>
<td>Response</td>
<td>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 Bridgewater 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 Regulation Establishment,</td>
</tr>
</tbody>
</table>
but it's probably worth a change to Research. 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”.

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