

## Planning Committee

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Tuesday, 12 July 2011 at 7.00 pm
Committee Rooms 1, 2 and 3, Brent Town Hall, Forty Lane, Wembley, HA9 9HD
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## Membership:

| Members  <br> Councillors: First alternates <br> Councillors:  | Second alternates <br> Councillors: |  |
| :--- | :--- | :--- |
| Sheth (Chair) | Thomas | R Moher |
| Daly (Vice-Chair) | Long | Naheerathan |
| Baker | Kansagra | HB Patel |
| Cummins | Cheese | Allie |
| Hashmi | Castle | Beck |
| Kabir | Oladapo | Powney |
| McLennan | J Moher | Moloney |
| Mitchell Murray | Van Kalwala | Butt |
| CJ Patel | Lorber | Castle |
| RS Patel | Gladbaum | Harrison |
| Singh | Hossain | Mashari |

For further information contact: Joe Kwateng, Democratic Services Officer joe.kwateng@brent.gov.uk, tel. (020) 89371354

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## The press and public are welcome to attend this meeting

## Agenda

Introductions, if appropriate.
Apologies for absence and clarification of alternate members

## ITEM

1. Declarations of personal and prejudicial interests

Members are invited to declare at this stage of the meeting, any relevant financial or other interest in the items on this agenda.

## Extract of Planning Code of Practice

2. Government Consultation - Relaxation of Planning Rules for Change of Use from Commercial to Residential
This report explains the recent Government consultation on relaxation of the planning rules for change of use from commercial to residential use, sets out the Council's response by officers and asks Committee for its endorsement.
3. Localism Bill \& Neighbourhood Plans

This report provides an update on the Localism Bill and in particular anticipated changes to local plan-making as a result of the proposal for Neighbourhood Plans. The report also provides details of an emerging neighbourhood plan proposed for Sudbury.
4. LDF - Wembley Area Action Plan

Having adopted the Core Strategy of the LDF in July 2010 and with the Site Specific Allocation DPD to be adopted this month, it is now proposed to produce a Wembley Area Action Plan as agreed by the Executive in November 2010. This report explains progress to date and how it is proposed that the Plan be taken forward.
5. Alperton Masterplan - Supplementary Planning Document

This report sets out the consultation process carried out and the representations made on the draft Alperton Masterplan Supplementary Planning Document ("the draft SPD"). The report also sets out the proposed officer responses to the consultation representations and proposed changes to the draft SPD as a consequence.
6. Future of Planning Committee Site Visits

This report sets out some options for consideration by members that will ensure a continuation of visits but with a focus on reducing the number of visits, confining attendance at the visits to members of the Committee, and looking at alternatives to the regular Saturday morning arrangements

PAGE

Barnhill;
21-32

Alperton;
33-188

All Wards;
189-200
in advance of the Committee meeting. As changes would have implications for the Planning Code of Conduct, any decision to change arrangements would require a decision by the full Council
7. Any Other Urgent Business

Notice of items to be raised under this heading must be given in writing to the Democratic Services Manager or his representative before the meeting in accordance with Standing Order 64.

Date of the next meeting: Tuesday, 2 August 2011
The site visits for that meeting will take place the preceding Saturday 30 July 2011 at 9.30am when the coach leaves Brent House.

Please remember to SWITCH OFF your mobile phone during the meeting.

- The meeting room is accessible by lift and seats will be provided for members of the public.
- Toilets are available on the second floor.
- Catering facilities can be found on the first floor near The Paul Daisley Hall.
- A public telephone is located in the foyer on the ground floor, opposite the Porters' Lodge

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## Agenda Annex

## EXTRACT OF THE PLANNING CODE OF PRACTICE

## Purpose of this Code

The Planning Code of Practice has been adopted by Brent Council to regulate the performance of its planning function. Its major objectives are to guide Members and officers of the Council in dealing with planning related matters and to inform potential developers and the public generally of the standards adopted by the Council in the exercise of its planning powers. The Planning Code of Practice is in addition to the Brent Members Code of Conduct adopted by the Council under the provisions of the Local Government Act 2000. The provisions of this code are designed to ensure that planning decisions are taken on proper planning grounds, are applied in a consistent and open manner and that Members making such decisions are, and are perceived as being, accountable for those decisions. Extracts from the Code and the Standing Orders are reproduced below as a reminder of their content.

## Accountability and Interests

4. If an approach is made to a Member of the Planning Committee from an applicant or agent or other interested party in relation to a particular planning application or any matter which may give rise to a planning application, the Member shall:
a) inform the person making such an approach that such matters should be addressed to officers or to Members who are not Members of the Planning Committee;
b) disclose the fact and nature of such an approach at any meeting of the Planning Committee where the planning application or matter in question is considered.
5. If the Chair decides to allow a non-member of the Committee to speak, the nonmember shall state the reason for wishing to speak. Such a Member shall disclose the fact he/she has been in contact with the applicant, agent or interested party if this be the case.
6. When the circumstances of any elected Member are such that they have
(i) a personal interest in any planning application or other matter, then the Member, if present, shall declare a personal interest at any meeting where the particular application or other matter is considered, and if the interest is also a prejudicial interest shall withdraw from the room where the meeting is being held and not take part in the discussion or vote on the application or other matter.
7. If any Member of the Council requests a Site Visit, prior to the debate at Planning Committee, their name shall be recorded. They shall provide and a
record kept of, their reason for the request and whether or not they have been approached concerning the application or other matter and if so, by whom.

## Meetings of the Planning Committee

24. If the Planning Committee wishes to grant planning permission contrary to officers' recommendation the application shall be deferred to the next meeting of the Committee for further consideration. Following a resolution of "minded to grant contrary to the officers' recommendation", the Chair shall put to the meeting for approval a statement of why the officers recommendation for refusal should be overturned, which, when approved, shall then be formally recorded in the minutes. When a planning application has been deferred, following a resolution of "minded to grant contrary to the officers' recommendation", then at the subsequent meeting the responsible officer shall have the opportunity to respond both in a further written report and orally to the reasons formulated by the Committee for granting permission. If the Planning Committee is still of the same view, then it shall again consider its reasons for granting permission, and a summary of the planning reasons for that decision shall be given, which reasons shall then be formally recorded in the Minutes of the meeting.
25. When the Planning Committee vote to refuse an application contrary to the recommendation of officers, the Chair shall put to the meeting for approval a statement of the planning reasons for refusal of the application, which if approved shall be entered into the Minutes of that meeting. Where the reason for refusal proposed by the Chair is not approved by the meeting, or where in the Chair's view it is not then possible to formulate planning reasons for refusal, the application shall be deferred for further consideration at the next meeting of the Committee. At the next meeting of the Committee the application shall be accompanied by a further written report from officers, in which the officers shall advise on possible planning reasons for refusal and the evidence that would be available to substantiate those reasons. If the Committee is still of the same view then it shall again consider its reasons for refusing permission which shall be recorded in the Minutes of the Meeting.
26. The Minutes of the Planning Committee shall record the names of those voting in favour, against or abstaining:
(i) on any resolution of "Minded to Grant or minded to refuse contrary to Officers Recommendation";
(ii) on any approval or refusal of an application referred to a subsequent meeting following such a resolution.

## STANDING ORDER 62 SPEAKING RIGHTS OF THE PLANNING COMMITTEE

(a) At meetings of the Planning Committee when reports are being considered on applications for planning permission any member of the public other than the applicant or his agent or representative who wishes to object to or support the grant of permission or support or oppose the imposition of conditions may do
so for a maximum of 2 minutes. Where more than one person wishes to speak on the same application the Chair shall have the discretion to limit the number of speakers to no more than 2 people and in so doing will seek to give priority to occupiers nearest to the application site or representing a group of people or to one objector and one supporter if there are both. In addition (and after hearing any members of the public who wish to speak) the applicant (or one person on the applicant's behalf) may speak to the Committee for a maximum of 3 minutes. In respect of both members of the public and applicants the Chair and members of the sub-committee may ask them questions after they have spoken.
(b) Persons wishing to speak to the Committee shall give notice to the Democratic Services Manager or his representatives prior to the commencement of the meeting. Normally such notice shall be given 24 hours before the commencement of the meeting. At the meeting the Chair shall call out the address of the application when it is reached and only if the applicant (or representative) and/or members of the public are present and then signify a desire to speak shall such persons be called to speak.
(c) In the event that all persons present at the meeting who have indicated that they wish to speak on any matter under consideration indicate that they agree with the officers recommendations and if the members then indicate that they are minded to agree the officers recommendation in full without further debate the Chair may dispense with the calling member of the public to speak on that matter.

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## Agenda Item 2


### 1.0 Summary

1.1 This report explains the recent Government consultation on relaxation of the planning rules for change of use from commercial to residential use, sets out the Council's response made by officers and asks Committee to endorse this.

### 2.0 Recommendations

2.1 That Planning Committee endorses the response made by officers to the consultation.

### 3.0 Detail

Introduction
3.1 The Government is committed to reforming the planning system so that it supports economic growth and drives an increase in the supply of land for housing. It has proposed, through the consultation, to achieve this by relaxing the planning rules for change of use from commercial to residential use
3.2 The consultation formally ended on $30^{\text {th }}$ July so an officer response has been put to Government. If Committee wishes to add to or amend what has been put forward as Brent's formal response then this can be sent to the relevant contact within the Department of Communities and Local Government (CLG). It is anticipated that the Government will make a decision on how to proceed with the proposals before the end of the year.

## Proposals

3.3 The key proposal is to introduce permitted development rights to allow changes of use from B1 (business - offices, research and development premises and light industry) to C3 (dwelling houses) to happen freely without the need for planning applications. In this way it is anticipated that developers will bring forward more proposals for housing.
3.4 In addition to this, the consultation document goes on to say that there is a strong case for making changes of use from B2 (general industrial) and B8 (storage and distribution) to C3 (dwelling houses) permitted development and there is also an opportunity to build on the current situation whereby it is possible to convert unused space above a shop into a flat.
3.5 These proposals relate only to change of use. Where a development requires any additional work to the exterior of an existing building, or is a new build development, a planning application for this operational development will be required in the normal way.
3.6 The Government's stated aim is to ensure that all unnecessary regulation is minimised and that good quality proposals are not delayed by the planning system. The Government believes that greater freedoms will also encourage the more efficient use of land and buildings through enabling more direct responses to clear price signals. In other words the view has been taken that market forces will ensure efficient use of land by, for example, making better use of buildings that are no longer needed and/or unsuitable for their original purpose.

## Brent Response

3.6 The response put in by officers is attached as Appendix 1. This can be summarised as follows:

- Brent welcomes the Government's emphasis on the delivery of new homes but disagrees strongly with the proposal to allow the change of use from business use class (B1, B2 and B8) to residential use class C3 to constitute 'permitted development'.
- Concern about the potential impacts of the proposals on the ability of local planning authorities to prevent inadequate and sub-standard housing being provided in areas where residential amenity standards will be low.
- Concern that the incursion of residential property into key industrial locations would have an adverse impact on the operation of businesses, with a consequent damaging effect on the economy.
- The ability to plan for sustainable communities will be undermined and, in particular, it will be difficult to ensure that appropriate supporting infrastructure, such as school accommodation, is provided. There will be a loss of Section 106 and Community Infrastructure Levy income to local authorities. It is considered an unrealistic expectation that developers will volunteer contributions in order to ensure that their development was more attractive to buyers, as suggested in the consultation document.
- Not only is the proposed relaxation of controls undesirable because of the potential adverse impacts that would arise, but they are also wholly unnecessary because it is based on the unfounded assumption that it is the planning system that is preventing sufficient new housing from being delivered.
- It is factors affecting the ability of developers to deliver consented schemes that need to be addressed.


### 4.0 Financial Implications

4.1 A potential direct implication, should the proposed changes to be introduced, is that it is likely that there would be a reduction in income to the borough from planning application fees. It would be difficult, and require additional resources, to monitor the level of new housing provided by the relaxation of planning rules. It is likely that the Council could lose part of its entitlement under the new homes bonus which is based on the level of new housing completions in the local authority's area.

### 5.0 Legal Implications

5.1 The introduction of the proposed relaxation would immediately render key aspects of the statutory development plan, such as restrictions on the type of use acceptable in Strategic Industrial Locations, as out-of-date thus requiring a review of policy.

### 6.0 Diversity Implications

6.1 If sub-standard homes are provided in areas with poor residential amenity then this will disproportionately affect certain sections of the community.

### 7.0 Staffing/Accommodation Implications

7.1 There are no staffing or accommodation implications arising directly from this report.

### 8.0 Environmental Implications

8.1 It is feared that mixing housing and certain business operations will result in an inferior living environment. The council will be unable to require its usual standards of design and landscaping. It will also not be possible to require the particular standards for sustainable buildings set for the Growth Areas of the Borough in the Core Strategy when implementing the Code for Sustainable Homes.

### 9.0 Background Papers

Relaxation of planning rules for change of use from commercial to residential. Consultation, CLG April 2011
http://www.communities.gov.uk/publications/planningandbuilding/relaxationchangeconsultation

## Contact Officers

Any person wishing to inspect the above papers should contact Ken Hullock, Planning \& Development 02089375309
Date July $12^{\text {th }} 2011 \quad$ Date 29/6/11

Chris Walker
Assistant Director, Planning \& Development

## Appendix 1 - Copy of Response to Government

Planning Service<br>4th Floor, Brent House<br>349 High Road, Wembley<br>Middlesex, HA9 6BZ<br>TEL 02089375309<br>FAX 02089375207<br>EMAIL ken.hullock@brent.gov.uk<br>WEB www.brent.gov.uk

Theresa Donoghue
Consultation Team (Commercial to Residential)
DCLG
Date: 29 June 2011
Eland House
Your ref:
Bressenden Place
London SW1E 5DU
Dear Ms Donoghue,

## Consultation on Change from Commercial to Residential Use of Property

The London Borough of Brent welcomes the opportunity to comment on the consultation on the relaxation of planning rules from commercial to residential use.

Brent recognises the urgent need for new housing and has identified a particular need for the delivery of affordable housing in the borough. As a local planning authority, the Council has been very pro-active in identifying housing sites, preparing positive plans and delivering planning consents. The Council has in place an adopted Core Strategy which plans for the delivery of new homes which exceeds the targets set out for Brent in the London Plan. In pursuit of this target, the Council gave consent to over 2,000 new homes in 2010/11, which substantially exceeds that which would need to be delivered to achieve the target.

Brent welcomes the Government's emphasis on the delivery of new homes but disagrees strongly with the proposal to allow the change of use from business use class (B1, B2 and B8) to residential use class C3 to constitute 'permitted development'.

Brent's response to the questionnaire is attached. In summary, the Council is concerned about the potential impacts of the proposals on the ability of local planning authorities to prevent inadequate and sub-standard housing being provided in areas where residential amenity standards will be low. At the same time, the Council is concerned that the incursion of residential property into key industrial locations would have an adverse impact on the operation of businesses, with a consequent damaging effect on the economy. Not only is the proposed relaxation of controls undesirable because of the potential adverse impacts that would arise, but they are also wholly unnecessary because it is based on the unfounded assumption that it is the planning system that is preventing sufficient new housing from being delivered. There are now consents for over 8,500 new homes in the housing pipeline in Brent. In Brent's experience the solution to the problem of the delivery of too few homes will not be provided by the relaxation of planning rules. Indeed, the planning system has been extremely successful locally in pro-actively promoting the development of new housing. It is factors affecting the ability of developers to deliver consented schemes that need to be addressed.

Yours sincerely

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## The consultation questions

## Question A: <br> Do you support the principle of the Government's proposal to grant permitted development rights to change use from B1 (business) to C3 (dwelling houses) subject to effective measures being put in place to mitigate the risk of homes being built in unsuitable locations?

Yes $\square$ No $\checkmark$

Please give your reasons:
There is sufficient site capacity for new housing, suggesting that the planning system is not at fault in ensuring the sufficient new housing is built. Within Brent for example there are currently outstanding consents for over 8,500 new homes.
Current plans and practice already enable appropriate use of land for residential and business purposes.
The ability to plan for sustainable communities will be undermined and, in particular, it will be difficult to ensure that appropriate supporting infrastructure is provided.
There are B1 premises in areas such as Strategic Industrial Locations where change to residential will be inappropriate because of potential impacts on the operation of businesses

## Question B:

Do you support the principle of granting permitted development rights to change use from B2 (general industrial) and B8 (storage \& distribution) to C3 (dwelling houses) subject to effective measures being put in place to mitigate the risk of homes being built in unsuitable locations?

Yes $\square$ No $\checkmark$

## Please give your reasons:

For the reasons outlined in the response to question A above and:

- There will be negative impacts on businesses from the mixing of residential uses with business use;
- Industrial and other commercial land will be lost to employment purposes thereby making the economic recovery more difficult. Economic growth will be undermined by both the negative impact upon businesses and by the loss of employment land. A wide range of different types of employment land is needed to support the complex and diverse economy that exists in the area and impacts will inevitably be felt more by certain sectors. Land that is most vulnerable to the proposed changes is likely to be the more marginal industrial locations. This accommodation is particularly important to SMEs and start-up businesses due to its affordability.
- It is not clear what would be effective measures to mitigate the risk of homes being built in unsuitable locations. For instance, noise generated from residential is discussed but not the impact of noise from existing businesses on new residential property. The statement that the market will make sensible decisions because homes in unsuitable locations will be hard to sell ignores the low cost rental market that exists. Without the controls provided bv the plannina svstem the market will


## Question C:

Do you agree that these proposals should also include a provision which allows land to revert to its previous use within five years of a change?

Comments:
There would be concerns about the potential reversion to business use where properties have been converted to residential and, as a consequence, servicing facilities necessary for business operation have been lost. The operation of

Question D:
Do you think it would be appropriate to extend the current permitted development rights outlined here to allow for more than one flat?

Yes $\square \quad$ No $\checkmark$
If so, should there be an upper limit?
Yes $\checkmark$ No $\square$
Comments:
There is a need to set an upper limit where there are ground floor retail premises with larme nffires ahnue where manv flate rnuld he nrnviden withnut nereccary

## Question E:

Do you agree that we have identified the full range of possible issues which might emerge as a result of these proposals?

Yes $\square$ No $\checkmark$

Are you aware of any further impacts that may need to be taken into account?
Yes $\checkmark$ No $\square$
Comments:
New homes created under this policy change may be low quality, without conforming to lifetime homes, living space or environmental standards
There are very real and potentially expensive costs relating to use conversion that may not be accounted for without the planning process, including compliance with safety requirements, introducing supporting infrastructure, and the appropriateness of converting commercial premises to housing use.
There will be a loss of Section 106 and CIL income to boroughs which is a valuable resource used to provide homes and infrastructure, as well as possible loss of business rates income in the future
The proposal potentially undermines a local planning authority's ability to effectively plan for longer term community infrastructure such as schools.
There is a significant threat that the higher land values for business sites converted to

## Question F:

Do you think that there is a requirement for mitigation of potential adverse impacts arising from these proposals and for which potential mitigations do you think the potential benefits are likely to exceed the potential costs?

Yes $\checkmark$ No

## Comments:

The consultation identifies potential problems with community infrastructure provision, amenity, housing mix, transport accessibility, loss of employment land, and noise and pollution. The Council agrees broadly with this list, but believes that impacts will not always be capable of successful mitigation, particularly for instance mitigating transport impacts when parking provision is a problem or mitigating the impacts of residential on the operation of businesses. It is not considered that a

Question G:
Can you identify any further mitigation options that could be used?
No.

Question H:
How, if at all, do you think any of the mitigation options could best be deployed?
$\square$
Question I:
What is your view on whether the reduced compensation provisions associated with the use of article 4 directions contained within section 189 of the Planning Act 2008 should or should not be applied? Please give your reasons:
$\square$
Question J:
Do you consider there is any justification for considering a national policy to allow change of use from $C$ to certain $B$ use classes?

Yes $\square \quad$ No $\checkmark$

## Please give your reasons:

This would depend to some extent upon the nature of the $B$ use class but it is difficult to envisage circumstances where residents in a typical suburban area would be accepting of the incursion of businesses into the neighbourhood, especially ones which generate significant numbers of car trips.
Question K:
Are there any further comments or suggestions you wish to make?

No.

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## Agenda Item 3



### 1.0 Summary

1.1 This report provides an update on the Localism Bill and in particular anticipated changes to local plan-making as a result of the proposal for Neighbourhood Plans. The report also provides details of an emerging neighbourhood plan proposed for Sudbury.

### 2.0 Recommendations

2.1 That the Planning Committee notes the key legislative and planning policy changes as set out in this report and is mindful of the likely resource implications of future neighbourhood plan proposals. The Planning Committee are also invited to take note of the proposals for a Sudbury Neighbourhood Plan and comment on the proposed boundary.

### 3.0 Detail

## Introduction

3.1 The Localism Bill introduces wide ranging changes to the powers and responsibilities of local government in a push to decentralise power from central government. The Bill is currently being considered by the House of Lords, amendments will then be considered before the Localism Bill becomes an Act of Parliament. The Localism Bill includes changes to general powers of competence, local government funding, governance arrangements, the right to challenge and buy community assets, housing reform and planning reform. This report focuses on the proposed planning reforms and provides an update to the report to Planning Committee on the $9^{\text {th }}$ March 2011 which set out the key provisions of the Localism Bill affecting the planning system including; abolition of regional strategies, a new National Planning Framework and

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Neighbourhood Plans. Since then, revisions to the Bill have been made and the government has introduced a Neighbourhood Planning Front Runners scheme to explore how neighbourhood plans are likely to work in practice.
3.2 Amendments made to the Localism Bill, include a new clause (124) which states that a planning authority is to have regard to material considerations in dealing with planning applications including any local finance considerations, so far as material to the application. Local finance considerations are taken to mean payment of either the New Homes Bonus or Community Infrastructure Levy. The amendment raises concerns that financial considerations are being given prominence and that this goes against a fundamental principle of planning that unacceptable development should not be permitted because of inducements or financial benefits. The amendment could lead to public suspicion that permissions are being bought and sold.
3.3 The new National Planning Framework will consolidate and streamline existing national planning policy. A consultation draft National Planning Framework is expected this summer and the finalised framework will be published in Jan 2012. The consultation draft will be reported to Planning Committee later this year.

## Neighbourhood Plans

3.4 A key element of planning reform is the introduction of Neighbourhood Plans as a new tier to the planning system. While the new Neighbourhood Plans will have equal status as other parts of the development plan such as the Core Strategy, they will need to be in line with strategic policies. For example, the Neighbourhood Plan will have to incorporate the strategic housing targets for the area as a minimum, but may propose additional development.
3.5 Proposals for a Neighbourhood Plan must come from a Neighbourhood Forum which must comprise a minimum of 21 people who live, work or are Councillors in a neighbourhood. The local authority is responsible for deciding the boundary of the plan that a Neighbourhood Forum wants to prepare. The local authority must provide support and advice to neighbourhoods undertaking neighbourhood planning which might include gathering relevant evidence or advising on consultation. This will have implications for officer time. The requirement to provide support does not include financial support.
3.6 Neighbourhood Plans will undergo an independent examination, undertaken by an examiner who is agreed by the Forum and the Council. The local authority will be responsible for meeting the costs of the examination. The examination will check whether the Neighbourhood Plan conforms with:

- The strategic content of the local plan
- The National Planning Framework or other national guidance, including the proposed 'presumption in favour of sustainable development';
- European Directives;
- National and international designations (e.g. Listed Buildings, Green Belts);
- Neighbouring neighbourhood plans.
3.6 Alongside Neighbourhood Development Plans, neighbourhood forums will also be able to introduce Neighbourhood Development Orders (NDO). These effectively grant

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permission for specified developments in a neighbourhood area. Where there is a NDO in place, there will be no need to apply for planning permission for development specified in the Order.
3.7 The Localism Bill also introduces 'Community Right to Build Orders' whereby local communities will be able to identify land for small scale development without the need for planning permission. The benefits of the development must remain within the community and Community Right to Build Orders will also be subject to independent examination and referendum.
3.8 The original drafting of the Localism Bill included a provision for a local referendum on a Neighbourhood Development Plan or Order once it had passed the examination. However, recent amendments proposed in the House of Lords include making local referendum discretionary. Should the requirement for referendum be retained, the Neighbourhood Development Plan or Order will be 'approved' if more than 50 per cent of those voting vote in favour of it. If the referendum is positive, then the local authority will have to adopt the Neighbourhood Development Plan or Order.
3.9 The Planning Advisory Service has produced a guide to Neighbourhood Planning for councillors; this is highlighted as a background document to this report.

## Emerging Sudbury Neighbourhood Plan

3.10 Officers in the planning department have been approached by members of Sudbury Town Residents Association (STRA) who wish to develop a Neighbourhood Plan and apply for the government's Neighbourhood Planning Frontrunners scheme. £20,000 grant is available for assisting communities in creating a Neighbourhood Plan. An application for the Frontrunners scheme will be made by the council on behalf of STRA. Should it be successful, the council will receive the grant which will then be available for STRA to fund production of the plan, including professional fees.
3.11 STRA is keen to develop a Neighbourhood Plan which will address the retail offer in Sudbury Town. Planning officers have recommended a boundary for the neighbourhood planning area which will be included in the Frontrunners application (Appendix 1). Should the application be successful, the boundary will need to be formally agreed by the council.

### 4.0 Financial Implications

4.1 Local authorities will be responsible for organising and covering the cost of independent examinations and undertaking a local referendum for a proposed Neighbourhood Plan or Order. The cost of the examination is unlikely to be of the scale of recent Development Plan Document examinations (Core Strategy, Site Specific Allocations) as they require a less involved process. The cost of a referendum will vary according to the area affected by the plan.

### 5.0 Legal Implications

5.1 If a Neighbourhood Plan or Order passes the examination and referendum, the local planning authority will be under a legal duty to bring them into force.

### 6.0 Diversity Implications

6.1 Neighbourhood Planning could be at risk of representing the interests of a vocal few. In the council's role to support neighbourhoods undertaking neighbourhood planning, it will be important to ensure proper consultation takes place and that as many people as possible are invited to be involved.

### 7.0 Staffing/Accommodation Implications

7.1 Local authorities are required to help and advise forums undertaking neighbourhood plans. This will have resource implications in terms of officer time.

### 8.0 Environmental Implications

8.1 Neighbourhood Plans and Orders will need to conform with European Directives. This may include Strategic Environmental Assessment and Sustainability Appraisal. Recent government guidance on SEA/SA states that these should be proportionate to the proposals being assessed.

### 9.0 Background Papers

Planning Committee Report 9 ${ }^{\text {th }}$ March 2011 - Proposed changes to legislation and planning policy

Neighbourhood Planning - a guide for ward councillors, Planning Advisory Service, May 2011 available from http://www.pas.gov.uk/pas/aio/1256514

## Contact Officers

Any person wishing to inspect the above papers should contact Amy Tyler-Jones, Planning \& Development 02089375318

## Andy Donald <br> Director of Regeneration \& Major Projects

Appendix 1 - STRA Neighbourhood Plan Draft Boundary

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### 1.0 Summary

1.1 Having adopted the Core Strategy of the LDF in July 2010 and with the Site Specific Allocation DPD to be adopted this month, it is now proposed to produce a Wembley Area Action Plan as agreed by the Executive in November 2010. This report explains progress to date and how it is proposed that the Plan be taken forward.

### 2.0 Recommendations

2.1 That Planning Committee notes the proposals for processing the Area Action Plan to adoption. Members are invited to consider the key issues identified and suggest additional issues for inclusion in the consultation document.

### 3.0 Detail

## Introduction

3.1 The proposal to produce an Area Action Plan (AAP) derives from the need to bring UDP policy, particularly the Wembley Regeneration Area chapter first drafted in 2000 and adopted in 2004, up-to-date. It was a commitment made by the Council at the beginning of the LDF process in 2005 and is a logical step in drawing up the folder of Development Plan Documents (DPDs) that will make up the LDF and ultimately supersede the UDP. The policies in the proposed AAP will include more detailed requirements for development than in the Core Strategy. It has also been made clear to stakeholders such as Quintain, in the examinations of both the Core Strategy and SSA DPD, that an AAP will be produced which brings forward more detailed policy for

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sites within their ownership, and this commitment is reflected in the Core Strategy, paragraph 4.42. The production of the AAP will also consolidate detailed policy and guidance currently contained in a number of documents.
3.2 It should be borne in mind, however, that there will continue to be a need for more detailed guidance outside of the development plan in SPD, such as that in the Wembley Masterplan and the Wembley Link SPD. The rationale for ensuring key policies and proposals are in a DPD is that this gives them greater weight, and more certainty about what will happen for developers and the community, as they will have been through a more rigorous process, including examination.

## Progress to date

3.3 Officers have begun the process of gathering evidence and are currently drafting Issues and Options papers which it is intended will form the basis of the initial public consultation. Views will be sought from residents and other stakeholders on what they think ought to be in the Plan. It is intended that this consultation will take place in September. A sustainability appraisal also has to be carried out. During consultation the appraisal results of all of the policy options will be available. The proposed boundary of the AAP is shown in appendix 1.

## Vision and Objectives

3.4 The Vision and objectives for the Plan are largely dictated by the Core Strategy and the Wembley Masterplan. There are also key policies in the Core Strategy, particularly policy CP7 dealing with the Wembley Growth Area, which determine what the basic strategy for the area is. This includes targets such as the number of homes to be built ( 11,500 from 2007 to 2026 ) of which $50 \%$ should be affordable, a target of 10,000 new jobs and a range of new development including expansion of the town centre eastwards. All this is to be supported by new infrastructure including, for example, new schools, new health facilities, new public open space, a new community pool and a new combined heat and power plant if financially viable.
3.5 The AAP will bring forward the detailed policy to achieve this as well as reviewing some existing policy such as the extent of the protected employment area (called a Strategic Industrial Location) and how better access to the area can be achieved. A number of issues have already been identified for consideration during the public consultation as set out below. It is intended that these will be added to and refined before the final consultation document is agreed.

## Issues

Transport
3.6 How much emphasis should be placed on meeting the needs of those who wish to use
the car both within, and to access, the area?

There is a need to encourage housing and commercial growth, and to promote the vitality and viability of town centres in Wembley, without giving rise to unacceptable

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environmental conditions and levels of traffic congestion. It is also important that travel choices contribute towards sustainability objectives.
3.7 What specific road schemes are considered necessary to facilitate the level of growth proposed in the Core Strategy?

There are a number of road improvements that could be implemented, some of which may be necessary to enable development. There are also specific road proposals included in the UDP in 2004 which have been completed only in part, the remaining parts being potentially unnecessary to deliver the growth proposed but which would help to promote the regeneration of the area and lead to environmental improvements.

### 3.8 What level of car parking provision is appropriate for the Wembley Regeneration Area?

Parking provision can be used as a mechanism for implementing a policy of restraint on car usage and promoting other modes of travel. At the same time, however, there is a need to promote successful regeneration. In Wembley, success will be measured in part by the amount of retail floorspace and other visitor attractions that are provided. In order to promote such development it is necessary to provide a level of car parking that can attract those people who wish to travel by car whilst encouraging people to use other modes of travel, particularly public transport.
3.9 What should be the priority in further improving public transport access to the area?

Given the significant progress towards implementing the Three stations Strategy, the issue now is how to deliver further improvements to public transport at Wembley. Further improvements at Wembley Central and Wembley Stadium stations are needed but the key improvements necessary as identified in the Core Strategy are to orbital services linking to Brent Cross and Ealing. It is Brent Council's view to date that such orbital improvements should be focussed on bus services.
3.10 How can enhancements to pedestrian and cycle routes contribute to achieving a modal shift away from the car in Wembley?

The provision of shared surfaces, where all the users of streets share the public realm, is a recognised way of improving the environment and safety of pedestrians and cyclists as it leads to much more considerate use by drivers of motor vehicles. Clearly, exclusively pedestrian streets will also provide a safe and attractive environment, especially for shoppers, and dedicated cycle routes will encourage people to access the area by bicycle.

### 3.11 To what degree should event related activity dictate the transport characteristics of the Wembley area?

The key issues to be addressed include ensuring the safety and security of residents and visitors alike, providing a high quality pedestrian environment, and managing car and coach access and parking effectively.

## Urban Design \& Placemaking

### 3.12 What is the appropriate character \& urban form for Wembley?

The vast amount of development already undertaken or given permission is of a similar scale and typology. If Wembley is to become a truly sustainable and attractive place to live, there needs to be more variety in the built fabric in order to fulfil the vision of a mixed community.
3.13 How can the approaches / gateways to Wembley be made more attractive to visitors?

Significant improvements have already been made to key nodes/gateways (3 stations) but there are a number of other potential gateways that could be significantly improved (Triangle junction, Stadium Access Corridor, Ealing Rd/High Rd).
3.14 Where in Wembley are tall buildings appropriately located and what should the maximum height be?

The Wembley Masterplan identifies indicative building heights and a range of locations for tall buildings (over 30m) including 3 locations for buildings of 15-20 storeys (approx $45-75 \mathrm{~m}$ ). The approved Quintain Stage 2 represents some significant departures from this. The Wembley Link SPD advocates a fresh approach to building heights within the town centre whereby a number of taller buildings will be considered at key locations none of which should be higher than Wembley Central.
3.15 Is there a need to review the design code for Olympic Way?

The Wembley Masterplan puts forward a design code for the buildings either side of Olympic Way and suggests some clear aspirations for the detailed design of perhaps the most important street in the borough. In light of the approved Quitain permission it may be necessary to review the aspirations for Olympic Way.
3.16 Should the Plan include a public art strategy and what should this comprise?

The Masterplan seeks to secure one significant permanent art work or installation within each district. There may be a need for a co-ordinated public art strategy across the AAP area and for this to be included in the Development Plan.

Open Space, Sports \& Nature Conservation
3.17 Should the plan include detail about the location and size of a new park in Wembley?

The new park in Wembley will be the principle new open space in the AAP area. It is required to meet the needs of the increased resident and working population of the area. The Core Strategy states that the new park should be at least 1.2 ha in size. In addition to the new Wembley park, a series of pocket parks are required which should be well connected to provide sufficient open space within a densely populated area.
3.18 What other open space improvements should there be?

The need to enhance and improve public open space in Wembley is established in the Core Strategy. There are a number of options for achieving this, including creating new public open space and improving access to existing open spaces
3.19 Is there a need for new food growing space to be provided in the Wembley area?

Brent Open Space Report - PPG17 Assessment identifies a local standard of 1 new allotment plot per 200 people. The report recognises the constraints in providing new allotment plots and that food growing opportunities can also be incorporated into new housing development by providing growing space at roof level.

### 3.20 What sports facilities improvements are needed in Wembley?

The council expects to secure a new community swimming pool and health and fitness centre as part of the redevelopment of Dexion House, Empire Way. The council has recently laid out football pitches and a new MUGA at King Edward VII park. Other sports facilities will be needed and these could be delivered in a number of ways, including council capital investment, access to school facilities and funding from development:

### 3.21 How and where should play provision be increased?

There is a shortage of play provision in Wembley. New development will increase demand for play facilities and the Infrastructure and Investment Framework identifies the need for 5 new neighbourhood play areas by 2026.
3.22 How can people's access to wildlife and nature conservation be improved?

There are limited areas of nature conservation value in Wembley, reflecting it's built up urban character. Much of Wembley is considered to be deficient in areas of wildlife that people can enjoy and relax in. London Plan policy seeks to improve people's access to nature.

## Town Centres and Shopping

3.23 Should policy seek to prevent adverse impact of new retail development on existing or proposed shops in the town centres of Wembley and Wembley Park?

New retail development outside of the town centre could potentially have a harmful impact on existing shops in the town centres. However, it could be accepted that new retail development outside of the town centres is just as accessible and will help to bring additional custom and trade to Wembley as a whole and thus benefit the wider area.
3.24 Should the town centre boundaries be re-defined to include a wider area?

The definition of the town centre boundary is important in determining where proposed major new retail development, and the development of other town centre uses, is generally acceptable. This could, for example, take into account existing planning
consents and identify an area which stretches from Forty Lane to Ealing Road. This may, however, be defining too large an area which could never be cohesive and would spread development too thinly rather than focussing it in the core location where a critical mass of development could ensure viability.
3.25 Is it desirable that planning policies should help promote parts of the town centre as distinctive locations serving different sections of the community?

Clearly Wembley is developing as distinct areas serving different markets including, in some cases, different sections of the community. It may be possible to promote and enhance these distinctions through planning policy.
3.26 Should temporary uses be acceptable on unused or underused sites and properties and what sort of uses will be acceptable?

There are a number of sites in Wembley, such as land adjacent to Wembley Stadium station, where development is unlikely to be brought forward in the short-term. It may be possible to bring some of this land into beneficial use by promoting it for temporary uses which could also help foster community cohesion and/or attract visitors to the area, as well as improving the environment.
3.27 Is it reasonable to introduce stricter controls for fast food outlets/takeaways (A5 uses) in parts of Wembley?

There has been some evidence that stricter planning controls over take-aways in particularly sensitive locations, such as close to schools, can deliver health benefits. Wembley experiences particular demand for such outlets from the visitors to the area to major events at the Stadium and Arena.

## Business, Industry \& Waste

3.28 Should some land currently designated as SIL be de-designated, and released for other uses, and if so, how much?

Whilst it is acknowledged that there will be a continuing need to retain the vast majority of SIL in the borough, it should also be recognised that the de-designation of some employment land could be beneficial in promoting jobs growth locally if land is redeveloped for mixed use development as with key parts of the regeneration area to the west. In addition, there are concerns that the proximity of industrial sites, and associated bad neighbour uses, to key regeneration sites is harming their development prospects because of the potential environmental impacts upon them.
3.29 What proportion of land in the SIL should be given over to bad-neighbour uses such as waste management?

There is a general view that if a significant proportion of land is occupied by uses such as open storage, aggregate depots and waste management, this will have a negative impact upon the regeneration potential of the wider area and will provide only a limited
number of jobs. It may, therefore, be considered reasonable that there should be a limit on the proportion of land devoted to such uses.
3.30 Is it unrealistic to expect the area to be developed as a business park?

Despite promotion of business park development, including within the London Plan, no business parks have been established in the locality let alone at Wembley. However, it is possible that further road and public transport improvements locally could give rise to renewed interest.
3.31 Should the AAP be promoting other job generating development rather than offices, including promoting change of use from that already granted permission?

Clearly without significant demand for office development, if current planning permissions are built out there is likely to be a significant excess of office floorspace in the Wembley area. A clear option would be to allow this to be converted to residential accommodation. However, if this were to happen then it is unlikely that the job targets would be realised as this is largely predicated on the delivery of new commercial space.

## Housing

3.32 Should the Plan include specific housing mix guidance which differs from that contained in the Core Strategy (25\% 3+ bed and balanced housing stock)?

It is a concern that schemes coming forward in the area are failing to deliver the mix of development required by the Core Strategy and the masterplan suggesting that a more specific or different mix policy may be appropriate for the Wembley area. There may be opportunities within the area to increase the proportion of family sized accommodation.

### 3.33 Does the Wembley area provide an opportunity to increase the amount of supported housing being provided in the borough?

Brent's Extra Care Housing Strategy identifies demand for 300 units of extra care accommodation over the period 2010-15. Given that the Wembley growth area is to provide half of the Boroughs new housing it may be considered appropriate that it should also provide half of the need for extra care homes. On the other hand the particular vision and objectives identified for Wembley regeneration area may not lend itself to the development of extra care housing locally.

### 3.34 How much purpose-built student accommodation is it appropriate to provide in Wembley?

There has been a lot of demand for student accommodation to be built in Wembley in recent years and consent has been given for over 2,600 beds. There is evidence that there is demand for further provision. The issue is whether there is a saturation level
at which the development of further student accommodation may become a problem, particularly if it is provided at the expense of other uses including housing meeting a known local need.

## Social Infrastructure

3.37 What priorities should the Council establish for funding social infrastructure?

The range of social infrastructure required to support communities in the Wembley area will require a significant level of investment. Development will offer some funding in the form of the Community Infrastructure Level (CIL) but there will be other demands on CIL such as transport and parks and open space.

## Energy, and Climate Change Mitigation \& Adaptation

How can carbon emissions from the Wembley area be minimised?
In order to help meet national and local targets for reducing carbon emissions, measures should be incorporated into the Plan.
3.39 Is a Wembley District Energy Network desirable and how can it be implemented?

The Core Strategy supports the development of a CHP plant within Wembley and this is in line with the Mayor's aim for $25 \%$ of London's heat and power to be supplied by decentralised energy by 2025. Currently schemes coming forward are proposing sitewide CHP solutions, however greater efficiencies could be achieved if a wider Wembley network was established. This would need to overcome barriers of connecting different sites to one another and finding a site for a single energy centre.
3.40 How should climate change adaptation be implemented in Wembley?

Increasingly it is acknowledged that a certain level of climate change is inevitable and development will need to be built to cope with a changing climate. The main climate change impacts on London will be overheating (urban heat island effect), water
scarcity, flooding, severe weather events and more frequent heatwaves. Specific issues for Wembley include the legacy of industrial use in the area which led to a lack of green and 'cool' spaces. Much of Wembley is deficient in open space and there are few mature trees. Land adjacent to the Wealdstone Brook is most at risk of flooding, although much of Wembley is also prone to surface water flooding. In addition the majority of the sewer network in the Wembley area is undersized.

## Timetable for Preparing the Area Action Plan

3.41 The timetable for preparing the area action Plan has, because of a reduction in available staff resources, changed from that originally agreed by Executive in November 2010. Below is set out the latest estimated timetable

Evidence Gathering Consultation on Issues and Options Consultation on Draft Plan
Pre- submission Consultation (Publication) Submission
Examination Hearings
Adoption
ongoing - Dec 2011
Sept 2011
Feb 2012
May 2012
Aug 2012
Dec 2012
July 2013

The intention is to bring a draft Plan back to Planning Committee for consideration prior to it going out on public consultation in early 2012

### 4.0 Financial Implications

4.1 The preparation and ultimate adoption of an Area Action Plan will provide a more up to date statutory Plan which carries greater weight in making planning decisions, which leads to fewer appeals and reduced costs associated with this. It also provides greater certainty for developers who are more likely to bring forward sites for development in the knowledge that schemes which comply with the requirements of the Plan have a good chance of receiving planning consent.
4.2 The costs of preparing the WAAP will be met mainly from Planning \& Development budget.

### 5.0 Legal Implications

5.1 The preparation of the LDF, including the Wembley AAP, is governed by a statutory process set out in the Planning and Compulsory Purchase Act 2004 and associated Government planning guidance and regulations. Once adopted the DPD will have substantial weight in determining planning applications and will supersede part of the UDP.

### 6.0 Diversity Implications

6.1 Full statutory public consultation will be carried out in preparing the DPD and an Impact Needs / Requirement Assessment (INRA), which assessed the process of producing the LDF, was prepared and made available in 2008. An Equalities Impact Assessment will be prepared to accompany consultation on the draft Plan.

### 7.0 Staffing/Accommodation Implications

7.1 The reduced level of staff available to work on the Plan means that it is not possible to bring it forward according to the timetable agreed by Executive in November. Future progress will be dependent upon priorities identified for limited staff resources.

### 8.0 Environmental Implications

8.1 The DPD deals with the development of the Borough's main regeneration area and thus will have a significant effect on controlling impacts on the environment including requiring measures to mitigate climate change. Sustainability appraisal will be undertaken at all stages of preparing the DPD.

### 9.0 Background Papers

Brent Core Strategy July 2010
Brent Site Specific Allocations Development Plan Document
Wembley Masterplan, June 2009

## Contact Officers

Any person wishing to inspect the above papers should contact Ken Hullock, Planning \& Development 02089375309

Chris Walker<br>Assistant Director, Planning \& Development

## Appendix 1 - Area Action Plan Boundary



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## 1. Summary

1.1. Alperton has been identified as a growth area within the Local Development Framework (LDF) Core Strategy providing 1600 new homes and creating new employment opportunities, exploiting the canal to front development and providing the necessary physical and social infrastructure to support the new and existing communities.
1.2. This report sets out the consultation process carried out and the representations made on the draft Alperton Masterplan Supplementary Planning Document ("the draft SPD"). The report also sets out the proposed officer responses to the consultation representations and proposed changes to the draft SPD as a consequence.
1.3. The Executive is asked to agree to these changes to the draft masterplan SPD and thereafter formerly adopt the Alperton Masterplan SPD to the Councils LDF Core Strategy.
1.4. The draft SPD can be found in appendix 1.

## 2. Recommendations

That Planning Committee
2.1. Support the proposed responses to the consultation representations and amendments to the draft masterplan SPD as outlined in section 4.0 and detailed in appendix 3 of this report; and

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2.2. Recommend that the council's Executive adopt the Alperton Masterplan as a Supplementary Planning Document to the Councils Local Development Framework (LDF) Core Strategy.

## 3. Background

3.1. Alperton's assets mean that it is an excellent location for new housing, new local employment and new amenities. The growth area is promoted in the Core Strategy for mixed use regeneration along the Grand Union Canal including at least 1600 new homes in the period to 2026, supported by infrastructure identified within the Infrastructure Investment Framework. The Core Strategy was approved for submission to the Secretary of State on $6^{\text {th }}$ April 2009, and was subsequently agreed at Full Council.
3.1.1. In December 2009 the council's Executive approved a vision for Alperton, which was illustrated and published in a prospectus document used to describe the vision to stakeholders and statutory partners. The vision for Alperton was generated through consultation with residents, local businesses, Council Officers, landowners and Statutory Partners.
3.2. The draft SPD was then developed by the project team during 2010, using the vision document as a foundation for the proposals. The draft SPD provides detailed planning guidance specific to this growth area. The document establishes principles for development including uses, physical and social infrastructure, and relationship of the development with the canal, phasing and delivery.
3.2.1. Support for the document to proceed to public consultation was given at CMT in September 2010. Approval to carry out public consultation on the SPD was given by Planning Committee in October 2010. The draft SPD was formerly consulted on in January and February 2011.

### 3.3. Detail

3.3.1. The Alperton "growth area" is a strip of brownfield land along the Grand Union Canal from Middlesex House in the west to the border with the Northfield Industrial Estate in the east, encompassing some of the poorest quality industrial land in the borough. The abiding impression of people visiting the industrial areas is not just its poor quality but the potential of the canal in creating a new waterside residential neighbourhood.
3.3.2. The council owns very little of the land identified and so cannot physically deliver the change on its own. This draft SPD is a planning document developed to inform and influence developers in the types of development the council would consider appropriate in Alperton.
3.3.3. The draft SPD is intended to be a clear and accessible document which both interests and excites developers and potential investors and is a useful tool to enable council officers to assess development proposals to ensure that they complement and support the vision for the area.
3.3.4. The draft SPD describes three distinctive new neighbourhoods/character areas linked by a high quality and lively stretch of canal.
3.3.5. "Alperton's core: a cultural centre" will be a lively centre for cultural activities, community facilities and local shopping. Development will be mixed use with a supply of modern business space for economic growth.
3.3.6. The "Waterside residential neighbourhood" will predominantly be a place to live for families within a compact environment defined by a network of connected streets and public spaces. Access to the canal for existing and new residents will be introduced on the off-side.
3.3.7. The "Industrial transition zone: a new working suburbia" will provide modern business space for large and small operations. A new bridge link across the River Brent will connect the estate with the fabric of Park Royal.
3.3.8. The success of the transformation will depend on the delivery of improved streets and connections, supporting social and physical infrastructure including new public realm and open space interventions. A sustainable approach to transport is made which proposes fewer cars and improved connections to public transport; energy efficient design and the employment of renewable energy are encouraged.
3.3.9. Each character area is described in terms of its overall feel and character, land use, building height, street hierarchy, public realm and open space improvements and housing density, types and tenure. Viability appraisals have been undertaken to test that the housing types and density suggested are feasible and deliverable considering current and emerging market conditions.

## 4. Consultation

4.1. Approval to carry out public consultation on the draft SPD was given by Planning Committee in October 2010. Below is a summary of the consultation which took place, refer to appendix 2 for the consultation report.
4.1.1. The consultation commenced on the $5^{\text {th }}$ January 2011 and closed on $25^{\text {th }}$ February 2011, a total period of seven weeks. The public consultation was carried out in line with the Council's statutory obligations set out in the Planning and Compulsory Purchase Act 2004. This act seeks to ensure
greater public participation and transparency in the planning process. The Council has followed the general consultation process for a SPD as set out in the Statement for Community Involvement (SCI) and has actually gone over and above these minimum requirements in order to ensure that the content of the SPD genuinely reflects the wants and needs of the local community.
4.1.2. In addition to a notice in the local press a letter was sent to approximately 2500 residents and local businesses in Alperton to inform them of the consultation taking place, posters advertising the consultation were on display around Alperton and e-mails were sent to all known stakeholders including Statutory Consultees, ward councillors, landowners of properties within the masterplan area and anyone who expressed an interest in the first round of consultation which took place in 2009.
4.1.3. A summary of the draft SPD was prepared to inform the consultation process as the draft SPD itself was considered to be too long to be genuinely accessible to members of the local community, this summary was published with the draft SPD on the Council's website and on the Planning Portal, and hard copies of the document were made available at One Stop Shops, local libraries and St James Church on Stanley Avenue.
4.1.4. The Council organised five exhibitions displaying the summary of the draft SPD as well as hard copies of the whole document. The exhibitions took place at a range of venues across Alperton at different times of day and days during the week. This was to ensure that the exhibition was accessible to a wide cross section of the community and so that as many people as possible could attend, one of the exhibitions was at the Shri Sanathan Hindu Mandir with an interpreter present. In total 127 people attended these events.
4.1.5. Several one to one meetings were held with interested parties including local businesses, developer/ landowners and the headmistress at Alperton Community School. A presentation was made to the Heather Park Neighbourhood Watch group and since January 2011 a second presentation has been made updating this group on the progress of the project.
4.1.6. A questionnaire was prepared, based on the summary of the draft SPD, which asked for feedback on whether the aims and ambitions of the draft SPD were supported as well as providing an opportunity for consultees to choose which projects within the community were the most important. This questionnaire was available to be filled in online using the Planning Portal as well as being made available as hard copies at the exhibitions. A total of four people completed the online questionnaire and a further 33 completed hard copies.
4.1.7. All comments and suggestions received in letters, e-mails and the questionnaires, a total of 63 pieces of source material have been tabulated and sorted into different topic headings, circa 280 individual comments were recorded (refer to appendix 3). Of the completed questionnaires, letters and e-mails received the majority of representations have been supportive of the proposals but many have provided suggestions for where the document could be improved or have raised particular issues. Out of a total of 63 representations only three were entirely unsupportive of the proposal. Whilst the sample size was too small to carry out any statistical analysis some key issues have been identified.

### 4.2. Questionnaire

4.2.1. The purpose of the questionnaire was to allow members of the community to comment on whether they agreed with the objectives of the draft SPD and to give them an opportunity to choose which of the potential projects which development could contribute towards were most important.
4.2.2. The number of questionnaires received was too small to be able to be used for statistical analysis, in addition to this, respondents tended to just fill out the sections which were relevant to them. In summary, between 33 and $57 \%$ of respondents agreed with the objectives of the draft SPD and between 3 and 11\% of respondents did not agree.
4.2.3. Where respondents were asked to choose which projects they thought were most important in the first character area, Alperton's Core, $25 \%$ of respondents selected improvements to Alperton Community School, 16\% selected to improve the public space outside Alperton Station. In the central character area $25 \%$ of respondents chose creating more open and green spaces along the canal and $21 \%$ of respondents chose a new road linking Woodside End and Mount Pleasant. In the Industrial Transition Zone 30\% of respondents chose creating a new connection to the North Circular Road (which would reduce freight traffic on Beresford Road).

### 4.3. Social and Physical Infrastructure

4.3.1. Almost half of the representations received have said that it is important to provide sufficient additional social and physical infrastructure to support the existing growth including GPs, dentists, school places, nursery places and community facilities. Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This aim to create a successful place is embedded within the Core Strategy (CP5), the changing needs of the community as the
population increases has been calculated and is set out in the Brent IIF. This approach is set out in Section 4.0 - Achieving the vision and more detail on the proposed location of the social infrastructure so that it is set out in Section 7.3 - Destinations and places, in response to these comments these two sections have been amended to make this intention clearer.
4.3.2. Representations received have also raised concern about the lack of open space for recreations and particularly for young people. Response: Section 7.3 describes the councils approach to meeting open space requirements in Alperton, which includes improving existing open space and proposing locations of new open spaces which can be delivered through development. It has been noted however that this section should provide more detail on how open spaces can be improved with a clear reference back to CP8 -Protection and enhancement of Open Space, Sports and Biodiversity and the requirements of the IIF.
4.3.3. Several comments have also been received about lack of support for the elderly and vulnerable members of the community and the need for more elderly care homes. Response: Supported housing need in the borough accommodates a wide range of client groups, which include the some of the most vulnerable people in the borough, including frail elderly people and individuals and households with multiple, complex needs. The provision of new care and support accommodation, as well as the remodelling of existing facilities, to enable people to live more independently is a strategic priority for the borough (CP21). The extent, number and location of such housing should come out of a borough wide assessment of needs and analysis of available resources and this will inform the next version of the IIF for the Borough. No changes to the draft SPD are proposed.

### 4.4. Housing

4.4.1. Some residents have raised concerns about the planned growth in the area, stating issues of overcrowding and congestion. Response: The decision to support growth in Alperton was already set out in the Core Strategy as one of the Boroughs Growth Areas. The Core Strategy (CP2) sets out the borough's plan for a sustainable population growth of 28,000 people by 2017 and the provision of at least 22,000 additional homes between 2007 and 2026. Over $85 \%$ of these new homes will be delivered in five growth areas, one of which is Alperton, where mixed use regeneration is identified as having the capacity to delivery a minimum of 1,600 new homes. The draft SPD has tested the acceptability of this target, which is informed by the LDF Site Specific Allocations. Indicative capacities and phasing for development sites across the borough are set out calculated on the basis of site area, accessibility to public transport,

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extant planning permissions and detailed pre-planning application discussion with developers. No changes are proposed to the draft SPD.
4.4.2. Several comments have been recorded about the massing and density of the new homes within the draft SPD and the low rise approach in the central character area- "Waterside Residential Neighbourhood". Typically comments from the existing community have expressed support for the ambition to restrict the height of new development so that it is in keeping with the existing massing and landowners and developers have expressed concerns that the proposed low rise development is too restrictive stating that the draft SPD should be more flexible. Response: The Council has carried out a significant amount of testing of the layouts that are illustrated in the draft SPD. Proposals within the central character area aims to show how the compact and tight-knit character described in the vision can be achieved whilst being sympathetic with the surrounding building heights and maintaining the spirit of existing planning requirements. The draft SPD is intended to be clear about the scale of development that the Council and Local community expect whilst at the same time being flexible in as much as it states that the proposals provide one interpretation of how development can come forward in Alperton to achieve the character that is set out in the vision and where design is of the highest or exemplary standard, higher densities will be considered. In response to these comments Section 4.0 and Section 9.0 - Waterside residential neighbourhood has been updated to reflect some of the comments received from developer/ landowners and it has been made clear that maps and diagrams are for illustrative purposes only and that future applications will not be held up against them to get an exact match.
4.4.3. Local residents have expressed concerns about building more high rise buildings in Alperton. Response: The guidance actually restricts taller, higher density housing to one area at the junction of Ealing Road and the canal near to Alperton Station. This area is considered suitable for higher density housing as it has good public transport links and is well served by a range of local services and amenities. Further, this area is characterised by taller buildings, such as Middlesex House, the recently completed development on Atlip Road, and the permitted proposal for the B\&Q site, and therefore this form of development is considered to be in keeping with the existing built environment. No changes to the draft SPD are proposed.

### 4.5. Transport

4.5.1. Existing residents are concerned about the number of new cars which will be introduced to Alperton as a result of the new development and are concerned about increased congestion and in particular increased strain on parking in the area. Response: The proposals in the SPD have been designed so that, using the average parking ratios set out in Section 7.4 Reducing car use, all new cars introduced to the area can be accommodated within the growth area boundary using a combination of on
and off street parking. Car clubs and car sharing will also be encouraged in new development to reduce car use. If new development has an affect on parking availability on existing streets then the introduction of controlled parking should be considered if it is in the interest of existing residents. Some residents have suggested that a multi storey car park should be built or developments should consider underground car parking, neither of these solutions have been proposed in the draft SPD as they are considered to be unviable and contrary to sustainable development and the design principles of the draft SPD. Section 7.4 has been updated to reinforce this approach.
4.5.2. Concerns have been recorded about the impact of additional cars on road safety, specifically on Beresford Avenue and Mount Pleasant which is already considered to be dangerous. Response: The Council has referred concerns raised about existing safety on Beresford Avenue to the Highways Department who are investigating this item. Opportunities for road and junction improvements and traffic calming if necessary will be investigated as part of the transport assessment for each individual development site. Section 7.2 - New routes and roads has been updated to reinforce this approach.
4.5.3. Support for better public transport has been noted, in particular more bus routes and increased frequency of existing routes. Residents have advised that they would like a bus routes to link Beresford Avenue to Stonebridge Park Station. Response: As a council we have an aspiration to secure a new bus route through the borough which will go through Alperton, linking Sainsbury's in the west with Beresford Avenue and Stonebridge Park Station. The council will continue to work closely with Transport for London to negotiate improved frequency of the 224 bus route and the potentially new bus route as the new homes are delivered and demand increases. Section 7.4 has been updated with more information on the proposed new bus route.

### 4.6. Northfields Industrial Estate

4.6.1. Comments have been received that support the alternative option to develop part of Northfields Industrial Estate for residential use but the representation from the GLA has been very clear that they cannot support this option as the Northfields Industrial Estate remains protected by the Mayor of London as a Strategic Industrial Location (SIL). Response: The Council believes that the site presents a major opportunity not only to provide additional homes but also contribute to the delivery of the essential social and physical infrastructure that Alperton needs including potentially a new open space and is disappointed that the GLA are not flexible enough to consider some enabling development to see this site come forward. Due to the specific concerns raised by the GLA however the council accepts reluctantly that any review of the site allocation will
need to be completed through a Development Plan Document and so has withdrawn any reference to any alternative development option for this area. Section 10.3 - Opportunity to introduce residential development along the canal has been withdrawn.

### 4.7. The Environment, Biodiversity and Waterside Regeneration

4.7.1. Comments have been received from Natural England, British Waterways, Environment Agency and the community that there should be more detail on how green and open spaces including the canal and Brent River will be protected and enhanced, also more emphasis on sustainable development and the effects of climate change has been requested. Response: Section 7.5 - Environmental Sustainability has been updated to include more guidance on sustainable development including relevant biodiversity and canal-side protection and enhancement measures which will be sought from development proposals and an additional section 7.6 has been added on renewable energy and climate change adaption.
4.7.2. Support for new on line and off line moorings has been recorded alongside concerns from developers and landowners about the costs involved in delivering these. Response: The draft SPD promotes the installation of a range of types of additional mooring points along the canal in appropriate locations and these have been proved to be deliverable by developments on the ground. To introduce canalside character alongside new developments, the masterplan does also suggest that it may be possible to introduce inlets at appropriate locations, which may be full depth or shallow constructions. The deliverability of specific proposals (technical and financial) would need to be properly investigated through the planning process.
4.7.3. Comments have been received about the need to improve the maintenance of the canal alongside concerns from developers about how this will be funded. Response: Although British Waterways will be principally responsible for the maintenance and upkeep of the tow path, new development in this area is likely to significantly increase the numbers of those using such spaces. The council will work together with developer partners and statutory undertakers in order to ensure that the canal is a successful public space and reasonable contributions to public realm improvements will be sought and negotiated upon as development comes forward. No change to the draft SPD is proposed.

### 4.8. Public realm, management and maintenance

4.8.1. Support for improvements to the public realm have been recorded alongside concerns that the public realm is not maintained adequately. Response: Public realm improvements are a central part of the proposals for Alperton, in order to create a legible and identifiable place which is
pleasant and safe to walk around. The draft SPD is to be read in conjunction with The Brent Placemaking Guide which sets out public realm policy and design guidelines. Contributions to the management and maintenance of open spaces will be required as part of any development proposal. Section 7.2 has been updated to reinforce the requirement to refer back to the Placemaking Guide and Section 11.1 - Working with Partners has been update to show a commitment to working with partners and the community to improve public realm design and management and maintenance.

### 4.9. Anti Social Behaviour (ASB)

4.9.1. Concerns about ASB including dog fouling, littering, vandalism and aggressive behaviour were recorded. Response: While the draft SPD cannot deal with every individual or particular problems related to ASB, it does provide support to ensure that in planning dwellings and neighbourhoods attention is given to planning out crime by adopting important design principles such as ensuring overlooking of spaces, providing good lines of sight and so-on. An amendment is proposed in section 4.0 to underline this important issue. It is recognised that the council will need to work closely with other teams including SNT, parks and streetcare as the area is developed to tackle such issues and section 11.1 has been updated to show this.

### 4.10. Conservation

4.10.1. Comments have been received that there should be more consideration for the historic environment. Response: The council will expect the usual detailed analysis of the impact of development on adjacent registered heritage assets, as part of any definite development proposal. The impact on views in and out of the Conservation Area will require testing and Brent Council will require the test as a part of any Design and Access statement.

### 4.11. Viability

4.11.1. Concerns have been recorded that the proposals are unrealistic and undeliverable. Response: The draft SPD sets out a broad interpretation of the vision for Alperton, including building massing that is able to deliver approximately 1600 homes, as identified within the Core Strategy. On the basis of estimations of land values, construction costs and sales values, the council is comfortable that the proposals are deliverable across medium to long term development cycles. The viability of specific proposals will be tested through the planning process having consideration for the need to deliver mixed and sustainable development, including infrastructure to support development and affordable housing. No changes are proposed.
4.11.2. Concerns about the accuracy of the viability study have been recorded and the affordable housing targets have been recorded. Response: On the basis of availability of information, the council has a broad understanding of costs and values in the masterplan area and these are not perceived to be prohibitive. The 2009 Affordable Housing Viability Study concludes that although circumstances vary from site to site, it is appropriate for the council to maintain the $50 \%$ borough wide target and this is included within the Adopted LDF Core Strategy (2011). Development proposals that come forward will be tested for viability through the planning process having regard for a number of factors, including the deliver of affordable housing. In any case, it is not possible for the draft SPD to introduce a policy that differs from the Core Strategy.
4.11.3. The requirement to work closely with the community during delivery stage has been recorded. Response: Section 11.1 has been update to show a commitment to working with partners and the community during delivery stage.

## 5. Financial Implications

5.1. The council's property interests in the area are very limited, its role in delivery is to facilitate development and help to prioritise the physical and social infrastructure needed to support new homes and adapt to changing economic circumstances. There is no proposal from the council to inject any kick start capital investment into the area.
5.2. Revenue Expenditure: The draft SPD is essentially a development promotional tool giving clear guidance and certainty to developers. It will be for land owners and developers to come forward on private land and bring forward proposals. The revenue costs to the council of any further planning work hereafter will be limited. It will be mostly limited to a role of encouragement and assistance through established Planning and Regeneration and Major Projects (R\&MP) Teams. A relatively small sum has been identified using New Homes Bonus funds to look at stalled development sites in the area. There is a clear business case for this work as it should be remembered that early delivery of new homes has significant benefits to the council in receiving New Homes Bonus.
5.3. Infrastructure Expenditure: The overall infrastructure needs of building 1600 new homes in this area was set out in the council's IIF. This was completed in 2008 and officers are now updating this IIF to support the proposed introduction of the Community Infrastructure Levy (CIL). In 2008, the 1600 new homes to be provided over the next 15-20 years were calculated to require $£ 24.4 \mathrm{~m}$ of infrastructure (transport, education, health,
open space, children's plan, community facilities and the like). Only $£ 10.4 \mathrm{~m}$ of this was identified at the time leaving a circa $£ 14 \mathrm{~m}$ shortfall. The scale of shortfall is by no means unusual and is normally remedied by reducing the quality or quantity of infrastructure or by utilising other funding schemes that are not known at the time. So for example, the New Homes Bonus, which was not available in 2008, could deliver at least $£ 12 \mathrm{~m}$ if it continued through the whole period. It is also proposed that CIL would collect more than the current S106 planning obligations. The costs of infrastructure development would therefore be largely neutral. Even if they were not, the council's judgement within the Core Strategy is that is growth provides housing stock renewal, jobs and other improvements to the borough that will be worth any notional infrastructure cost.
5.4. School provision: The 2008 IIF only included the costs of providing for the 'extra new' population that would be generated by the new homes. This amounted to an extra form of entry at secondary school level and two forms of entry at primary school level, based on expanding existing schools (so no land acquisition costs were included). At the time the redevelopment of Alperton Community School was promoted as a Building Schools for the Future (BSF) Project and full replacement funding was assumed. Currently there is likely to be enough capital resource generated through either S106 or CIL to cover the cost of school expansion in the area if it takes place on existing school sites. The complete redevelopment of Alperton Community School is largely outside of the growth agenda because it was to remedy existing deficiencies in the school buildings and layout. Nevertheless the R\&MP team will review the possible development options by the Autumn/Winter of this year for report to Executive.
5.5. The Council expects that the published document will improve preapplication understanding and negotiations with developers and contribute to improved application processing times. The adopted draft SPD will, in parallel with the infrastructure study, clarify the Council's expectations upon developers for their contribution to roads, schools, open space, health and community facilities etc.
5.6. The original planning and consultation work was met from R\&MP and planning service budget and any future costs, for example publishing the document, will be met from R\&MP budgets funded from the New Homes Bonus.

## 6. Legal Implications

6.1. The Planning and Compulsory Purchase Act 2004 has changed the statutory basis for drawing up development plans in England and Wales. Unitary Development Plans and Supplementary Planning Guidance will be replaced by a Local Development Framework (LDF). Supplementary Planning Documents (SPD) are intended to provide greater detail and clarify the Council"s planning policies however, they cannot introduce new policies.
6.2. New Planning Policy Statement 12 "Local Spatial Planning" (PPS12) sets out the procedural policy and process of preparing Local Development Documents, including SPD. SPD's are produced as part of the council' s Local Development Framework and replace Supplementary Planning Guidance (SPG). The SPD's expand on the council' s adopted policies to provide more detailed information than can be contained in the policies themselves. The draft SPD cannot introduce new policy and is consistent with the Core Strategy.
6.3. Any of the Council-led infrastructure proposals will have to go through the appropriate Council procedures e.g. obtaining approvals from the Planning Committee and the Executive if required.

## 7. Diversity Implications

7.1. The Statement of Community Involvement identifies how the public are to be engaged in the preparation of draft SPD in general. An inclusive approach to the consultation was taken.
7.2. The draft SPD sets out the development framework in one of the most diverse communities in London. The regeneration of the area is set to embrace and celebrate this diversity through the securing of a range of facilities for the community to meet the needs of its diverse ethnic, cultural and religious groups. It also tries to create a broad base of employment opportunities for different sectors and supports skills and other training and job placements. The draft SPD also tries to create an environment such as new public parks and spaces which will be accessible to all.
7.3. The Council has carried out an impact needs/requirement assessment on the draft SPD, and this is available as a background document.
8. Staffing/Accommodation Implications (if appropriate)
8.1. There are no additional staffing requirements arising as a result of the recommendations of this report.

## 9. Environmental Implications

| Alperton Masterplan SPD | Version no.1 |
| :--- | ---: |
| Planning committee | $27 / 06 / 11$ |
| 12 July 2011 |  |

9.1. The Planning Act 2008 allows Local Planning Authorities to prepare SPD without undertaking SA/SEA, as long as they screen for the need for a Sustainability Appraisal (SA) incorporating a Strategic Environmental Assessment (SEA) of the SPD as it is produced. In light of the 2008 Planning Act, the Council is required to carry out a screening to ensure that the legal requirements for SA/SEA are met where there are impacts that have not been covered in the appraisal of the parent DPD.
9.2. The draft SPD screening report is available as a background document.

Appendices:
Appendix 1 - Draft Alperton Masterplan SPD
Appendix 2 - Consultation Report
Appendix 3 - Table of consultation comments

## Background Papers

Alperton SPD Equalities Impact assessment (INRA)
Alperton SPD - Sustainability Appraisal Statement

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### 1.0 Foreword

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### 2.0 Executive Summary

Brent Council has identified the land adjoining the canal in Alperton as a growth area suitable for the construction of new homes to meet the UK wide demands of population growth and the shortage of housing.

This Supplementary Planning Document (SPD) is part of the Brent Local Development Framework and is supplementary to the Brent Core Strategy 2010 and the Site Specific Allocations 2011 . The purpose of the masterplan is to set out in detail how the council will bring about the transformation of this poor quality industrial area into a new, mostly residential neighbourhood. It will provide clear guidance for developers, landowners and residents about the significant scale of change which the council would like to see happen.

As a 'growth area' Alperton's transformation sits within the council's overall approach to growth: the delivery of physical, social and eco-
nomic regeneration by enabling new development in a defined locaOn. This transformation is considered within the context of the diverse (8)pulation of Alperton and how it can support existing arts and culeral activities.

The 'Vision for Alperton' developed with council partners, residents, businesses and landowners, forms the basis for this masterplan. The vision describes a transformed Alperton as having three distinct character areas by virtues of use, scale and appearance, linked together by a lively stretch of the Grand Union Canal. Each character area is described in terms of its overall feel and character, land use, building height, street hierarchy, public realm, open space improvements and housing density, types and tenure.
'Alperton's core: will be a lively centre for cultural activities, community facilities and local shopping. Development will be mixed use with a supply of modern business space for economic growth.

The 'Waterside residential neighbourhood' will predominantly be a place to live for families within a compact environment defined by a network of connected streets and public spaces. Access to the canal for existing and new residents will be introduced on the off-side.

The 'Industrial transition zone' will provide modern business space for large and small operations. A road bridge link across the River Brent will connect Northfields Industrial Estate with the North Circular Road and onwards to Park Royal.

A new urban structure is established which suggests new streets and connections, improving connectivity between the new and existing communities, and access to and across the canal. Destinations are identified as a series of new public realm and open space improvements.

A sustainable approach to transport is set out which proposes fewer cars and improved connections to public transport. Energy efficient design and renewable energy is encouraged.

Viability studies have been carried out to test which housing types and densities are feasible and deliverable considering current and emerging market conditions.

Whilst much of the industrial land in Alperton is of poor quality, there are businesses which are doing well and employing local people. The council intends to encourage proposals where affected businesses have been offered an acceptable solution.

Although the councils property interests in the area are very limited, its role in delivery is to facilitate development and prioritise the physical and social infrastructure needed to support new homes and adapt to changing economic circumstances.

The aim of this document is to demonstrate how Alperton can be transformed through growth to deliver homes, business space, jobs, services and infrastructure to support a sustainable community.

The strategic objectives of the SPD are to:

## Social

- Deliver a quality environment where people will want to live, work, shop, study and visit
- Providing new homes for families, couples and individuals
- Provide new social infrastructure (education and health facilities, community centres) to support growth


## Environmental

- Develop a distinct urban character of buildings, streets and spaces celebrating Alperton's unique assets
OD Open up the canal and develop it as a place for recreation, res-
© pite, peace and transport
© Provide new and improved open spaces for recreation


## Economic

- Protect and enhance the viability and vitality of Ealing Road as a District Centre
- Exploit Alperton's proximity to Park Royal Industrial Estate to generate more local jobs.


### 3.0 A Vision for Alperton

There are some great things happening in Alperton today. Ealing Road is one of London's best Asian shopping areas and the stunning new Shri Sanatan Hindu Temple is now complete. It has become an important visitor destination.

Hidden behind the housing and industrial estates is Alperton's great surprise - one of the most under-appreciated stretches of the Grand Union Canal. Running along the canal is a network of small industrial estates, supporting a wide variety of businesses.

But these great attractions do not add up to an identifiable community. Ealing Road loses its unique character as it approaches Alperton Station. The streets are visibly run down and disadvantaged by conflicts between the industry and residential neighbourhoods and the canal is under-used.

> D @ vision for Alperton is to transform this disjointed and rundown part $\mathbb{Q}$ London into a coherent and attractive place to live, work, shop, serdy and visit.



### 4.0 Achieving the Vision

The masterplan is a Supplementary Planning Document (SPD) part of the Brent Local Development Framework and is supplementary to the Brent Core Strategy 2010 and the emerging Site Specific Allocations 2011. It is a material consideration for the determination of planning applications for development in the masterplan area.

Alperton has been identified as being suitable for at least 1600 new homes (Core Strategy Policies CP2 and CP8) but the council owns very little of the land identified so cannot physically deliver the change on its own.

This masterplan has been developed to inform and influence developers in the types of development the council would consider appropriate in Alperton. This SPD can be used by developers to understand the key principles of the regeneration and to guide proposals and by the council to encourage regeneration and assess planning applica-禺
©
Pracemaking is a key driver in the proposals set out in this document Where major proposals in Alperton should have regard for the needs of the community and the need for infrastructure, both social and physical, arising from development. This approach is embedded within the Core Strategy (CP5).

All development proposals must deliver and contribute to forms of physical and social infrastructure, either directly through development or through secured planning obligations, including open space, play space, towpath improvements and forms of health and education. These facilities will require space secured from new development in space that meets occupiers needs, and at rents that they can afford.

Developments will include affordable housing with a target of 50 per cent affordable housing (CP2), a balanced housing stock with a mix of unit sizes according to the particular character area (CP21). The 2009 BNP Paribas study demonstrated that 50 per cent affordable housing would be achievable under certain circumstances but ultimately this will depend on the viability of each scheme.

Residential development must achieve Code for Sustainable Homes Level 4. Commercial and community floor space must achieve BREEAM excellent. (CP 19)

The proposals in this document provide one interpretation of how development can come forward in Alperton to achieve the character that is set out in the vision. New development must deliver the design and build quality required to create the character described throughout the masterplan though future applications will not be held up against them to get an exact match. Where design and materials used are of the highest or exemplary standard, higher densities will be considered (CP6).


### 5.0 Change of use: supporting growth

Industrial land use data show that there is approximately 100 hectares of vacant industrial land in the borough - over 20 years supply. Most of the industrial land in Alperton is very poor quality with derelict buildings and sits immediately adjacent to existing residential areas. The industrial neighbours generate noise, visual dust and odour impacts, as well as significant transport problems. This land is ripe for redevelopment.

Much of the land that is being promoted for development was protected for industrial use by planning policies. With the adoption of the Core Strategy this has changed and now the land is promoted for higher value, mixed use development.

This planned release has been considered and justified on the basis of the demand, supply and quality of land and premises in the borough. Additionally, the 'release' requires new business space to be provided $\dagger$ bat can be properly integrated with existing and new homes, with a ©) ©ortion at affordable rents.
8
Infrastructure and Investment Framework identifies specific forms of infrastructure required to support development within this growth area. This document provides a framework of infrastructure projects (e.g. streets, bridges, school premises) that must be delivered with the growth that has been identified in this document.

As well as enabling development through land use policy change and shaping development through planning policy the council will continue to take an active role to help facilitate delivery by:

- Working with developers to achieve the best and most sustainable solution for each site
- Supporting businesses that are affected
- Maintaining strong partnerships with housing associations

Northfields Industrial Estate remains protected for industrial use by the Mayor of London. The London Plan designates the land as a Strategic Industrial Location and the Core Strategy does not include the site within the Alperton Growth Area. This document does not introduce a revised policy position for the land.

Despite this, the masterplan includes an alternative development possibility for Northfields as the council feels that the site presents a major opportunity and will work with the Mayor of London to investigate a policy vehicle for releasing the potential of the site in the medium to long term. DELETED

Clockwise from top left: Northfield Industrial Estate, businesses in Wharfside Industrial Estate, Abbey Manufacturing Estate, Park Royal, Northfield Industrial Estate, private footbridge in Northfield Industrial Estate, Abbey Manufacturing Estate, Hand Car Wash sign, historical industrial buildings in Abbey Manufacturing Estate, now demolished.


### 6.0 Alperton Today

Alperton is situated in the south west of Brent, set within the wider environs of Park Royal. Alperton consists of 1930s suburban residential streets, culs-de-sacs and industrial estates sitting uneasily side by side. Alperton has a number of assets: a 1.6 km stretch of the Grand Union Canal, Ealing Road and the Shri Sanathan Hindu Temple, access to good public transport and it's proximity to Park Royal, the North Circular Road and Heathrow. Alperton is host to the largest Diwali festival outside India. Wembley is the closest and most accessible major town centre.

Alperton's greatest assets and attractions are clearly under used and do not enable an identifiable community to flourish. Ealing Road is constantly congested and the successful end of the high street does not extend down to Alperton Station. The canal is cut off from many residents in existing communities, with one long standing footbridge
from Mount Pleasant only now being supported by a new crossing
nnecting Atlip Road and Hazel Grove.
©
Dren spaces in and around the area are either of poor quality (Neather Park Drive, Alperton Recreation Ground) or inaccessible (One Tree Hill) and as a result they are not well used and have become hotspots for anti social behaviour.

Clockwise from top left: Shri Sanathan Hindu Temple, Alperton Underground Station, One Tree Hill, shops on Ealing Road, typical semi detached housing in Mount Pleasant, new footbridge at Atlip Road development, Ace Café, Middlesex House, Grand Union Canal


### 6.1 Existing Character

Alperton is an area of contrasts-open suburban residential streets abut fine grained, densely developed industrial estates with building typologies ranging from large scale industrial sheds to mixed use flatted development, late twentieth century office blocks and traditional suburban terraces. The existing built form in the growth area is more easily understood by looking at the three distinct areas that each have their own characteristics and common features.

The area at the western end of the masterplan around Alperton underground station and Ealing Road is characterised by relatively large building footprints arranged in a fairly ad-hoc manner. The principal organising structures are all linear in nature (Ealing Road, the canal and the railway arches), none of which are particularly well defined by the buildings that surround them.

The central character area probably has the most distinctive urban fom. It is fine grain, densely developed and intimate in scale. The合eets are narrow and difficult to navigate, which adds as well as detoxts from the experience. The buildings generally turn their backs on the canal, thus missing out on the potential of this attractive waterside location. Housing stock in this area is typically two and three storey, semi-detached.

The eastern character area, Northfields Industrial Estate, is currently designated as a Strategic Industrial Location by the GLA in the London Plan. The majority of the site is vacant but historically has been characterised by large low rise industrial buildings.

Alperton Today


### 6.2 Getting around

Permeability through the masterplan area is relatively poor at present, partly because of the severance created by the canal, rail line and the busy Ealing Road. In addition, much of the area is made up of derelict or semi derelict plots, most of which are only accessible directly from the nearest main road. Residential side roads provide access to some of the existing commercial uses; these roads are narrow and have become congested with on street parking.

Alperton growth area lies between Alperton Station (Piccadilly Line) and Stonebridge Park Station (Bakerloo Line and London Overground). These stations provide frequent and direct services to central London.

The western end of the growth area, close to Alperton station, benefits from good accessibility to bus services, while most of the remaining sites are only served by the currently infrequent number 224 which
Onnects to Alperton Station but does not serve Stonebridge Park Stan. The Public Transport Accessibility Level (PTAL) in the central char-雨ter area is therefore currently low.
®

Alperton Today






### 7.1 A canal runs through it

Our vision is to establish three distinctive new neighbourhoods linked by a high quality and lively stretch of canal, these are:

- Alperton's core: a cultural centre
- Waterside residential neighbourhood
- Northfields Industrial Estate

As you walk towards the canal from the cultural core of Alperton, you will encounter a series of green spaces, each with a different character, some active centres for play and gathering and others more tranquil spots for quiet relaxation.

Along the canal a new waterside residential neighbourhood will emerge with conveniently located bridges across the canal, connecting communities either side with local facilities, such as a doctor's sur-
Gry, library, learning centre, café, local jobs, and transport hubs,
若 industrial transition zone adjacent to Park Royal links the canal with anvider pedestrian and cycle network, through a new green corridor dNong the North Circular Road and Brent River Park, providing a pleasant and safe route through the area.

The canal is one of Alperton's unique assets and as such must be protected from inappropriate development and must be preserved for the benefit, enjoyment, health and wellbeing of Brent's residents (CP18).

There is also an opportunity to use Northfield Industrial Estate as a site for moving freight by the canal (CP20).

## Alperton Tomorrow



### 7.2 New routes and streets

When Alperton is transformed, pedestrians and cyclists will be able to move freely and easily through the area: across Ealing Road; across the canal; and into attractive and safe places and spaces.

Alperton will be tied together by a network of new streets, public spaces and footbridges. Both new and existing residents will be able to access the waterside and use straight forward connections to local amenities, shops and public transport connections. The onus will be on ease of movement through an attractive and safe public place.

Principal interventions include:

- Better connections to One Tree Hill from Ealing Road
- Improved access to Sainsbury's supermarket
- A new strategic connection linking Atlip Road and Mount Pleasant via Woodside End
Landscape improvements to the canal tow path
© $\mathbb{D}$ New access to the canal on the off side with public spaces close to the water
- An improved route to Stonebridge Park station through Northfields
- A new footbridge at Northfields


## key

New and improved routes and streets will be delivered by the individual development sites which they are spatially linked to; contributions towards wider public realm improvements will be commensurate with the scale of the development (CP6). Opportunities for road and junction improvements and traffic calming if necessary will be investigated as part of the transport assessment for each individual development site.

Developers should refer to The Brent Placemaking Guide which sets out public realm policy and design guidelines.
strategic connection
public realm works
new routes (pedestrian)
new routes (vehicular)
bridges
existing roadsunderground station
destination - open spacedestination - retail or cultural

## Alperton Tomorrow



### 7.3 Destinations and places

The Council recognises that in order for the transformation of Alperton to be a success, new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This aim to ensure a successful place is embedded within the Core Strategy (CP5),

Alperton will have excellent access to health and education facilities, a new community centre and new and improved open spaces (CP8). The changing needs of the community as the population increases have been calculated and are set out in the Brent Infrastructure and Investment Framework which includes indicative costs of infrastructure development, possible funding sources and prioritisation in terms of spend.

Aspart of the legible network of connections described in section 7.2, masterplan proposes a series of new public realm and open space合erventions. Active commercial and community uses including the sQrial infrastructure outlined above will be sited alongside public sPaces to provide activity and natural surveillance (Figure X).

A series of new small open spaces will be created as part of development proposals to provide public amenity and activity exploiting the unique setting of the canal. There is the potential to deliver larger new open spaces along the canal on certain development sites.

The SPD supports the delivery of a new public open space outside AIperton Station whose development could be linked to the redevelopment of Alperton Community School.

The six existing principal open spaces will be improved in terms of quality of landscape, facilities and accessibility, including play facilities and consistency and robustness of furniture and lighting (CP18).

Existing open spaces

- One Tree Hill
- Heather Park
- Alperton Recreation Ground
- Mount Pleasant green space
- Lyon Park School Playing Fields
- Grand Union Canal

Each character area section in this document lists specific improvements for existing destinations and places.

Amenity space will be provided for every new home within the development sites, using private amenity space standards and child plot standards for new development.

## Alperton Tomorrow





### 7.4 Reducing car use

Proposals must contribute to a sustainable transport strategy, including improved public transport, car clubs, car free developments, particularly around Alperton station and the rollout and subsidy of local controlled parking zones should be considered if it is in the interest of existing residents.

Legibility and connection is fundamental to the success of the masterplan SPD which has specific proposals for new connections, improved linkages to Alperton and Stonebridge Park stations, local shops and services and an improved bus service. Together, these measures will encourage people to walk, use bicycles and public transport.

With increased demand from passengers living in the new homes, bus route 224 will be improved in terms of frequency and capacity, providing a regular connection to Wembley and Park Royal, and connecting with both Alperton and Stonebridge Park stations. Additional bus stops E to be provided, particularly along Mount Pleasant and Beresford丳enve.
$\infty$
The council has an aspiration to secure a new bus route going through Alperton, linking Sainsbury's in the west with Beresford Avenue and Stonebridge Park Station.

Parking restraint measures are proposed across the masterplan area, with fewer spaces provided for cars in locations more accessible by public transport. To complement this, the roll out of car clubs will provide residents with access to cars at affordable rates as and when they need them, but reducing the overall number of cars on the roads. Charging points for electric cars will be required for new developments.

The proposals in the SPD have been designed so that, using the average parking ratios set out below, all new cars introduced to the area can be accommodated within the growth area boundary using a combination of on and off street parking.

Travel Plan

| Alperton's Core | 0.4 spaces per unit |
| :--- | :--- |
| The Waterside Residential <br> Neighbourhood | 0.6 spaces per unit |
| The Industrial Transition Zone | 0.65 spaces per unit |

Table X— Average parking ratios for the respective character areas

## Alperton Tomorrow

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### 7.5 Environmental Sustainability

The Core Strategy requires that all major housing proposals in Alperton are built to Code for Sustainable Homes Level 4, and non residential development to BREEAM "Excellent". Proposals will be expected to comply with Supplementary Planning Guidance SPPG 19 Sustainable Design and Construction and score a minimum of $50 \%$ on the Brent Sustainability Checklist. The extensive southern aspect of development sites offers potential for passive solar design, while a tight urban grain, particularly within the Waterside Residential Neighbourhood will provide opportunities for shading through orientation of buildings.

All proposals will be expected to incorporate the following principles of sustainable development:

- Use landform, layout, orientation, massing and landscaping to reduce energy demand
${ }^{\circ}$ T Connect to, or provide for future connection to decentralised energy if feasible
Provide multi-functional green spaces and green networks Prioritise sustainable drainage systems
Provide space for recycling and composting
- Promote active travel with suitable cycle parking, implement travel plans and provide a safe and attractive cycling and walking environment

New development in Alperton will need to be built to cope with the adverse effects of climate change, including higher summer temperature, increased risk of flooding, and reduced water availability and quality. Proposals should incorporate the following adaptation measures:

## Preventing overheating

- Shading and orientation of buildings
- Thermal mass to regulate temperature naturally
- Use of cool (light-coloured) or reflective building materials
- Natural ventilation and active cooling
- Provide cool \& attractive outdoor areas, green roofs, street trees \& living walls

Flood protection

- Limit surface water run off to green field runoff rate so flood risk is not increased off-site
- Evaluate the use of sustainable urban drainage methods in the following order of preference: living roofs, basins and ponds, filter strips and swales, infiltration devices, permeable surfaces and tanked systems.
- All flat roof space should be utilised for living roofs (or solar panels) where feasible


## Conserve water

- Use of water efficient fixtures and fittings
- Rainwater harvesting for reuse in buildings and for irrigation
- Grey water recycling
- Sustainable drainage systems to collect and store water

New development will place pressure on existing utilities infrastructure such as water and wastewater. The above measures will help to minimise this impact, in addition developers should demonstrate that adequate capacity exists or upgrades to utilities infrastructure will be required prior to occupation of the development.

Reducing the carbon footprint of new development in Alperton should first be addressed by ensuring energy efficient design and proposals will be encouraged to adopt best practice building fabric performance standards (e.g. FEES).

The proximity of the development sites and the mix of uses within the SPD facilitate the introduction of a decentralised network of Combined Cooling, Heat and Power (CCHP) systems, with the potential to connect adjacent sites as development proceeds. The presence of both commercial and residential floor space allows for heating and cooling to occur within respective buildings and neighbouring uses at different times of the day, maximising the potential of heat recovery. PV panels are a renewable technology compatible with CCHP. The feasibility and delivery of such a system would be contingent on the scale of development coming forward.

## Alperton Tomorrow



### 7.6 Environment protection and enhancement

Contaminated land
Land contamination is likely to be an issue on many development sites in the Alperton growth area. Appropriate site investigation and remediation measures will be required, with a preference for bioremediation, soil vapour extraction and soil washing methods, which are preferable to less sustainable dig and dump practices.

Canal wildlife protection and enhancement
The Grand Union Canal is an important resource for wildlife, and is designated Metropolitan Importance for Nature Conservation. Proposals affecting the canal should protect and enhance the canal habitat and improve public access. Water quality should be protected by preventing rainwater run-off entering the canal by using Sustainable Urban Drainage systems (SUDs).

| 0 |
| :--- |
| 0 |
| $\infty$ |
| $\infty$ |
| $\infty$ |
| 0 |

Protection measures

- Protecting canal side trees
- Removing invasive plants including Japanese Knotweed and Giant Hogweed
- Bats roost under many canal bridges and canal side structures avoid artificial lighting on bat roosts, entrance points and flight paths
- Ensure development include SUDs measures to manage run-off and water quality

Enhancement Measures

- Marginal vegetation planting
- Nesting rafts
- Install bird and bat bricks/boxes
- Create reedbeds and ponds
- Opportunities to provide soft planting along the towpath
- Aquatic planting within the canal
- Green roofs and living walls
- Tree and hedgerow planting
- Plant bare walls with climbers
- Wildflower planting
- New public access to canal and opening up public footpaths

Alperton Tomorrow


### 8.0 Alperton's Core: a cultural centre

"Alperton's local centre will be a lively, cosmopolitan destination catering for its culturally diverse population"

The canal acts as a spine connecting a network of open spaces that extend from the cultural core of Alperton at Ealing Road through a waterside residential neighbourhood and into an industrial transition zone next to the North Circular Road.

Emerging out of Alperton Station a new public space will be the start of a busy and energetic high street, linking in a selection of shops, restaurants and public transport facilities. Alperton Community School will be a local hub, providing extended services to the wider community.

This new flexible space will be capable of being closed to traffic for festivals such as Diwali. It will also provide a navigable and safe con-想tion between the Grand Union Canal and One Tree Hill.
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$\infty$ Oerton ('s local centre DELETE) will be a lively, cosmopolitan destinaon catering for its culturally diverse population. The Shri Sanathan Hindu Temple will re-enforce the cultural significance of the centre. Alperton is a popular shopping destination specialising in Asian food, fashion and music. The entrepreneurial spirit which exists will be nurtured and encouraged. Existing businesses will have room to expand in appropriate accommodation.

New and improved business premises will help further raise the aspirations of the existing business community and attract new investment. The new development at this centre will be high density and mixed use. Well designed tall buildings at the crossing of Ealing Road and the canal will mark the entrance to this destination.

The site adjacent to Alperton House, currently Jewsons builders yard is not within the growth area boundary but the council recognises this sites potential for mixed use development, residential, employment including managed workspace and potentially an area of public open space adjacent to the canal.

This image provides a three dimensional interpretation of how the vision for Alperton could be achieved and is for illustrative purposes only.


### 8.1 Regeneration principles

- Legible area defined by distinctive buildings up to 17 storeys in height in specific locations, including a refurbished Middlesex House.
- High density development, new housing is promoted for smaller households
- A busy urban area with high quality commercial uses at an active street level
- Enhancing viability and vitality of Ealing Road as a national destination
- Stimulate economic growth and provide opportunities for both businesses and the local community
- A coherent and less cluttered public realm with robust and attractive street furniture
- Promoting efficient movement in a more pedestrian friendly place with better, simpler and more useable connections.


## "O80

 Public access to the canal will be provided with activity in new public spaces.Canal side buildings will exploit the proximity to the water benefit$\infty$ ing from the increased sales value of buildings next to open water.

Interventions and projects which could be delivered

1. Redevelopment of Alperton Community Schoo
2. Alperton Station Square-A major new public space around Alperton Station.
3. Enhancements to Tree Hill Open Space including improved access from Ealing Road
4. A new public space at the former $B \& Q$ site
5. A new public space at Alperton House
6. Junction improvements to Ealing Road at Bridgewater Road and Mount Pleasant
7. Lighting scheme at Manor Farm and Ealing Road canal bridges
8. Complete connection from Atlip Road to Woodside End
9. Improved access to Sainsbury's


### 8.2 A place to live: housing types

Alperton's core will be a busy urban area with high density development, and new housing is promoted for smaller households, with a predominance of 1 and 2 bedroom homes. However at least $40 \%$ of social rented accommodation should preferably be 3 bedrooms and above in size.

New dwellings must meet the Standards of the Mayors Housing Design Guide on dwelling sizes. Developers should have regard to other standards within the design guide, noting that not all are mandatory.

Below is a suggested mix across tenures (\%)

## Affordable Rented

 Intermediate Drivate| 1 | 2 | 3 | 4 |
| ---: | ---: | ---: | ---: |
| 15 | 45 | 40 | 0 |
| 45 | 45 | 10 | 0 |
| 45 | 45 | 10 | 0 | 0

$\stackrel{\circ}{0}$
0
0


## North - South Section : Alperton's Core

Alperton's Core: a cultural centre


### 9.0 Waterside Neighbourhood: a new community

## "A new type of community which provides family homes in a compact modern environment"

Moving east along the canal a different neighbourhood emerges, quieter and more residential; a new type of community which provides family homes in a compact modern environment. New housing will activate the canal, taking advantage of the views and special character that is generated.

The scale of the new development will relate to the adjacent existing neighbourhoods to the north and south, with taller buildings making the transition into a different scale in the Northfield Estate. The homes will set high standards of environmentally sensitive design.

A series of public and private open spaces emerge with the new de, Opments. Open spaces along the canal will be the location for @w community facilities. Existing open spaces will be improved to Povide new recreation and sports facilities.

## N

The new residential neighbourhood will be made accessible by improvements to public transport. Initiatives could include a more frequent local bus route joining Alperton and Stonebridge stations and a 'fast bus' link to Wembley. Car clubs will be introduced to provide residents with an alternative to private car use.

The existing built form and physical location of this district offers the greatest opportunities to apply innovative design to create a neighbourhood with a very special and clearly distinguishable character. It is envisaged that mews and courtyard type of developments will be introduced, and other similar forms that entail relatively small front to front distances.

The concept for this area is to create a new canal side community, whilst retaining and reinforcing that which currently makes up the character of Alperton today. The proposed development seeks to achieve a unique identity for this new residential neighbourhood where streets and spaces are compact, urban and enclosed allowing housing targets to be achieved whilst maintaining a massing appropriate to the existing context.

Standards in existing planning policy such as physical separation have been challenged and it is suggested that good quality residential amenity can still be achieved through the careful design, placement and orientation of windows to prevent overlooking. The council will only be persuaded of this approach where designs and materials are of the highest quality.

Where new development interfaces with existing residential areas great care will be taken to protect the privacy outlook and amenity of the existing residents of Alperton.

This image provides a three dimensional interpretation of how the vision for Alperton could be achieved and is for illustrative purposes only.


### 9.1 Regeneration principles

- A permeable network of streets and spaces designed primarily for people.
- Building heights mainly three storeys to respect existing context
- Homes largely consisting of maisonettes and town houses with doors on the street.
- Proposals more closely respecting SPG17 separation standards where it interfaces with existing properties.
- Commercial activity within studios, workspaces and local shops.
- A new connection between Atlip Road and Mount Pleasant via Woodside End
- Better access to the canal
- New development should provide residential off street parking in line with the stated average parking ratios.
- Limited and controlled public on-street parking will be provided for visitors/servicing as part of integrated shared surface treatments
O Parking controls will be introduced to prevent residents in new (D) developments from parking in existing residential streets


## Projects and interventions

10. A series of open spaces adjacent to the canal
11. Reconfiguration of Mount Pleasant/Beresford Avenue junction
12. Improvements to Mount Pleasant play area
13. Completing of connection from Woodside End to Mount Pleasant

## Waterside Neighbourhood: a new community



### 9.2 A place to live: housing types

The Waterside Residential Neighbourhood is promoted as suitable for families, and as such housing types should be focussed more towards larger units, including townhouses and maisonettes. At least $60 \%$ of social rented accommodation should be 3 bedrooms and above in size.

New dwellings must meet the Standards of the Mayors Housing Design Guide on dwelling sizes. Developers should have regard to other standards within the design guide, noting that not all are mandatory.

Below is a suggested mix across tenures (\%)

Affordable Rented
Intermediate
Drivate

| 1 | 2 | 3 |  |
| ---: | ---: | ---: | ---: |
| 5 | 35 | 30 | 30 |
| 40 | 40 | 20 | 0 |
| 40 | 40 | 20 | 0 |


| 8 |
| :--- |
| 0 |
| 0 |
| 8 |



North - South Section : Waterside Neighbourhood

Waterside Neighbourhood: a new community


### 10.0 Northfields: a new working suburb

The 'Industrial transition zone' comprises of the Northfields Industrial Estate. This land is protected in the London Plan as a Strategic Industrial Location and this document does not propose a deviation from this.

Development on the Northfield Estate will provide new employment space where local industry can be relocated and consolidated. New development in this area will provide a mix of modern light industrial units, studios and managed workspaces.

There is also an opportunity to use Northfield Industrial Estate as a site for moving freight by the canal (CP20).

Open spaces and cafes will provide places where residents and businesses can feel connected. The Ace Café will continue to be a significant landmark and social hub for the area.

Dew access road to the North Circular will reduce existing conflicts国tween residential and employment land and improve established leosiness links to Park Royal. Any new bridge and junction works would be subject of a detailed transport study. There is a long-term ambition for Stonebridge Park Station to become a transport interchange.

However, an option is proposed where land adjacent to the canal is released for mixed use development as there is potential to create a new working suburbia which will combine new homes with modern business space for large and small operations.

The council is committed to securing the long term commercial and industrial role of the site and will seek to explore a policy and delivery vehicles to achieve this with partners, including the GLA. DELETE

All new development should be set back from the River Brent by a minimum of 8 metres and new development should show a commitment to naturalising, enhancing and restoring the river Brent corridor or parts of the Brent river corridor and a commitment to restoring natural floodplain and the provision of fluvial flood attenuation either in a designated flood alleviation scheme of attenuation of flood waters on

This image provides a three dimensional interpretation of how the vision for Alperton could be achieved and is for illustrative purposes only.


### 10.2 Regeneration principles

- An industrial character in the designs for new workspace.
- Providing business relocation space to enable redevelopment of the adjacent growth area
- Major pedestrian route connecting the waterside with the Ace Cafe and Stonebridge Park Station beyond.
- A new street moving south from Beresford Avenue providing effective separation from new workspaces and active frontages for commercial and community uses. DELETE
- Improved physical links to Park Royal with a road bridge across the River Brent to the North Circular Road.
- New public space at the 'knuckle' of the canal, with a crossing across the water.
- Support for naturalising, enhancing and restoring the Brent river corridor


## Projects and interventions

14. Vehicular Crossing to North Circular Road
15. Footbridge at Beresford Avenue
16. Heather Park Drive open space
17. Route to Stonebridge Park Station
18. New pedestrian crossings across Brent River
19. Public realm improvements to Queensbury Road Strategic Industrial Location (SIL) including signage, planting, lighting and landscaping.

## Northfields: a new working suburb



### 10.3 Opportunity to introduce residential development along the canal

An option is proposed where land adjacent to the canal is released for mixed use development as there is potential to create a new working suburbia which will combine new homes with modern business space for large and small operations.

New home-work units will provide a buffer zone between the lightindustrial and residential area. Taking advantage of the topographical changes at Northfields Industrial Estate, the uses will have a clearly defined separation.

## Housing tenure/ social mix

The Industrial Transition Zone is considered suitable for a wide range of unit sizes across

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 tenures, with large building footprints andwde open spaces between them. At least
嘸\% of social rented accommodation
sbould be 3 bedrooms and above in size.

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New dwellings must meet the standards
Mayor's Housing Design Guide.
Below is a suggested mix across tenures

Affordable Rented Intermediate Private

| 1 | 2 | 3 | 4 |
| ---: | ---: | ---: | ---: |
| 10 | 40 | 40 | 10 |
| 45 | 45 | 10 | 0 |
| 40 | 40 | 20 | 0 |

Northfields: a new working suburb


### 11.1 Working with partners

Much of the land in Alperton is within private ownership, either by existing businesses, property developers and investors or housing associations, who will deliver new homes, commercial and community space. Discussions with landowners and developers have been held in relation to almost all of the land within the growth area, reflecting a high degree of interest from the development market. Indeed, some sites now benefit from planning permissions.

The council's role in implementation is one of leading, enabling and facilitating change. The LDF Core Strategy has released planning protection upon employment land in Alperton, therefore establishing the principle of mixed use development. The preparation of the Vision for Alperton and this SPD has set a direction for what can Alperton become.

Tסfacilitate change in Alperton, the council will negotiate develop\&ient proposals through the planning system and secure benefits such © affordable housing, community facilities and public realm interven† ${ }^{\text {®n }}$. It will also continue to develop partnerships between delivery A- Encies to ensure local and regional players can collectively use their influence and obligations to shape Alperton.

The council will seek to maintain the links to the local community which have been established during the development of this SPD and will work with existing Alperton residents and businesses during delivery stage to eliminate concerns. Developers are encouraged to closely engage with existing communities including local faith groups, Neighbourhood Watch Groups and Resident Associations on the emerging proposals.

The council does have compulsory purchase powers and will consider using them to remove blockages to the transformation of Alperton to deliver the vision.

### 11.0 Making it happen



### 11.2 Business relocation

There is a clear message within this document - the run down dislocated industrial estates of Alperton will be transformed into a coherent sustainable mixed use community. Alperton has some of the worst quality industrial land in Brent. There are almost 100 hectares of vacant land and buildings elsewhere in the borough, including approximately 60 hectares in Park Royal - this is over 25 years supply of vacant land.

Although there are a small number of successful and sustainable businesses in the masterplan area, the vast majority of the units accommodate marginal car repair operations. Bad neighbour uses, such as car repair, spaying and scrapping can be better located away from established and growing residential areas. This situation requires a radical transformation and will not be possible to achieve the objectives of the masterplan while keeping some businesses in situ and redeveloping land around them, while there is such a large supply of suitable Id elsewhere in the borough.

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 Bry of the offer to release industrial land is for new mixed use develop-n- nt to include business space at affordable rents - some space has alieady been secured at the former $B \& Q$ superstore and the Minavil House proposals and is a policy requirement elsewhere in the masterplan area. Developers are encouraged to negotiate with occupiers to include businesses within new space that can sit comfortably and sensitively alongside residential development.A supply of space could be delivered that includes a number of units at a range of sizes. Rents could be "stair-cased" or "pump primed" so that early years were more affordable but could then increase as businesses grow. Units could be located around shared business administrative hubs (such as meeting venues, reception, copying).

Alternatively, the council will work with business to explore opportunities to relocate elsewhere in the wider Alperton or Park Royal area Interviews with existing businesses in the area indicate that there is an appetite for businesses to come together to purchase land and build units at Northfields as part of the comprehensive redevelopment. It is likely that this will require subsidy as part of the development.
11.0 Making it happen


### 11.3 Deliverability

An understanding of the deliverability and feasibility of the masterplan has informed and tested the formation of the design and commentary text. This has been an iterative process of testing and refining.

To understand the viability of future developments, an analysis of land ownership and exchange has been completed across the area to form an appreciation of existing use values, exchange of land and prices paid and any premiums to assemble land from fractured ownerships.

This analysis suggests that the highest value existing commercial uses appear to be in "Alperton's Core" with a combination of office and retail uses. However, the land is not fragmented and can be delivered as developable sites. Further east in the "Waterside Residential NDighbourhood" Avenue, existing use values are very low, but the Nnership is more fractured which may lead to costs relating to assEmbly. At the "Industrial Transition Zone", values are considered to low, and the land is already assembled, but there may be costs reiated to addressing physical, utilities and access constraints.

Using a development appraisal tool, the council understands development costs and sales values of what the SPD proposes. The conclusions are that high density flatted development cost significantly more to build than houses and maisonettes. Because they are denser, they often require physically more car parking spaces, often in basements. They also take longer to build and therefore longer to sell. Clearly, approximately 1,600 homes will not be built simultaneously or even within the same development cycle. It may be that some sites may not come forward without appreciation within the housing market.

The Core Strategy requires $50 \%$ affordable housing across the borough, supported by a 2009 Affordable Housing delivery study prepared by BNP Paribas. The appraisal of the SPD has sensitivity tested proportions of affordable housing to understand the impact on scheme viability.

Development sites and proposals within Alperton to date have a track record of producing a high proportion of affordable housing. The definition of affordable housing has now changed to be up to $80 \%$ of the local rental market, but housing benefit has now been capped.

Additionally, the level of grant funding available to deliver affordable housing is now lower than it was. The council will continue to expect affordable housing to be delivered and the policy requirement of the Core Strategy stands. Proposals will continue to be considered on a case by case basis using the GLA Affordable Housing Toolkit, Three Dragons or other appropriate tools.

### 11.0 Making it happen

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### 11.4 Funding sources

It is envisaged that the majority of development will come forward through private developers in a co-ordinated approach in line with the core objectives of this document. The council will have to achieve its wider economic, social, community and sustainability objectives mainly from that development and to use such funding creatively to attract other sources of funding.

Main sources of funding could include:
S106 funding through Standard Charge or by direct developer provision;
New Homes Bonus
Growth Area Funding or other Government programmes;
Brent Council's Capital Programme;
Greater London Authority including Transport for London:
Ther Agencies, e.g. Lottery
曾ect Government funding through education and other pro-
gammes.
Section 106 (S106) Strategy
Section 106 contribution is determined by the quantum and nature of proposed development. Development quanta have been suggested for the masterplan as a whole but the council will take into account viability and the achievement of other planning objectives in determining permissible levels of development. A range of infrastructure requirements is envisaged as a result of comprehensive redevelopment of the area.

The main infrastructure requirements required as a result of new housing and other development is set out in the councils Core Strategy (CP8). The SPD sets out in more detail where requirements such as open space may be located. In due course it is the councils intention to replace s106 planning obligations largely by implementation of the Community Infrastructure Levy (CIL) although the local infrastructure requirements such as bus contributions would still be sought in s106
planning obligations.

## Utilitities

All new development must fully consider water and wastewater infrastructure capacity both on and off the site in order to avoid any potential problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water and sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the statutory undertaker, then the developer needs to contact the undertaker to agree what improvements are required and how they will be funded prior to any occupation of the development

### 11.0 Making it happen



### 11.5 Infrastructure projects

|  | Projec $\dagger$ | Timeframe | Delivery partners | Comments |
| :---: | :---: | :---: | :---: | :---: |
| 1 | Alperton Community School | Ongoing | Brent Council <br> Alperton Community School <br> Development | The council will investigate delivery vehicles to bring forward a new school. New campus could include space for wider community facilities. |
| 2 | Alperton Station Square | Ongoing | Brent Council Development Alperton Community School Transport for London Mayor of London | A major new public space on Ealing Road redefining the setting and role of Alperton Station, Alperton Community School, Alperton Bus Garage and One Tree Hill. |
| 3 | One Tree Hill Open Space | Ongoing | Brent Council Development Alperton Community School | Access to open space will be integrated with Ealing Road Square. Improvements will include landscaping, furniture and play facilities. |
| 4 | Public space at the former B \& s site | By 2016 | Brent Council Development | Secured by planning permission. |
| $\begin{array}{\|l} \hline 0 \\ 0 \\ 0 \\ \hline 0 \end{array}$ | Public space at Alperton House | By 2016 | Brent Council Development | Will be required from development. |
| $\frac{1}{2}$ | Junction improvements to Ealing Road at Bridgewater Road and Mount Pleasant | By 2012 | Brent Council Development Transport for London | Bridgewater Road/Ealing Road secured by Minavil House planning permission. Mount Pleasant/Ealing Road delivered as part of public space at Ealing Road. |
| 7 | Lighting scheme at Manor Farm and Ealing Road canal bridges | By 2012 | Brent Council Development British Waterways | S106 monies could be pooled into a canal fund. |
| 8 | Facilitation of connection of Atlip Road to Woodside End in the adjacent character area | Ongoing | Brent Council Development |  |
| 9 | Improve access to Sainsbury's | By 2012 | Brent Council Development | Greater legibility of access to the superstore, including from the canal and a new crossing at Ealing Road |
| 10 | Public spaces adjacent to the canal | By 2018 | Brent Council Development | This will be secured through development. |

### 11.0 Making it happen

|  | Projec $\dagger$ | Timeframe | Delivery partners | Comments |
| :---: | :---: | :---: | :---: | :---: |
| 11 | Reconfiguration of Mount Pleasant/ Beresford Avenue junction | By 2018 | Brent Council Development | Redesign of junction will create public space on Mount Pleasant, secured through development. |
| 12 | Improvements to Mount Pleasant play area | By 2018 | Brent Council Development Playbuilder | Redesign of connection between Mount Pleasant and Stanley Avenue with improved boundary design. New play facilities. |
| 13 | Completing of connection from Woodside End to Mount Pleasant | By 2018 | Brent Council Development |  |
| 14 | Vehicular Crossing to North Circular Road | By 2020 | Brent Council Development Transport for London | To relieve Heather Park Drive of industrial traffic. Will help to integrate Northfields with the fabric of Park Royal. |
|  | Footbridge at Beresford Avenue | By 2020 | Brent Council Development British Waterways | Connecting towpath with Northfields. Will land at new public space and link with redefined connection to Heather Park open space. |
| 16 | Heather Park Drive open space | By 2020 | Brent Council Development | Increased accessibility from Beresford Avenue, new furniture and play space. |
| 17 | Route to Stonebridge Park Station | By 2020 | Brent Council Development Transport for London Network Rail | Use of water main through Northfields. Significant public realm and security improvements to space beneath the viaduct including lighting and decluttering. |
| 18 | New pedestrian crossings across Brent River | By 2020 | Brent Council Development British Waterways Environment Agency | Will connect masterplan area to North Circular Road bus routes. |
| 19 | Public realm improvements to Queensbury Road SIL including signage, planting, lighting and landscaping. | By 2020 | Brent Council Development | To support the continuing function of the industrial estate and improve the local environment. |

### 11.6 Infrastructure projects ...cont

### 11.5 Infrastructure projects

There are a number of projects that are not within character areas, or do not yet have identified locations. These include:

| Project | Delivery mechanism | Comments |
| :---: | :---: | :---: |
| Nursery places for 0-2 year olds. | Private operation Development | This is not a statutory obligation of the council. Opportunities for space within new developments will be explored. |
| New Lyon Park primary school and nursery places for 3 your olds. | Brent Council Lyon Park primary school Development | The space could be provided within an expanded Lyon Park primary school. |
| Approximately 2 hectares of public open space טָల | Brent Council Development | There are six existing open spaces which require significant improvement and a series of small public spaces will be created within developments and character areas. |
| ©) provements to Alperton Sports Ground and Mount Pleasant playground $\stackrel{\rightharpoonup}{\perp}$ | Brent Council Development Playbuilder | Improvements will be to accessibility to spaces, landscaping works, sports and changing facilities, play facilities and furniture. |
| Canal towpath improvements to planting, furniture, surface and lighting | Brent Council Development British Waterways | Developments on offside will pay into a canal fund for works on the towpath side as part of a cohesive strategy. |
| New doorstep play areas for the youngest children | Development | These must be delivered on site in line with the London Plan. |
| New play areas, including MUGAs for older children in local open spaces | Brent Council Development Playbuilder | These must be delivered in line with the requirements of the London Plan. |
| Health and fitness centre | Private operation Development | Opportunities for space within developments will be explored. |
| New health centre for doctors and dentists | Brent Council Brent PCT <br> Development | This could be provided as a community campus around Alperton Community School and Alperton Station. |
| Improved bus service along Mount Pleasant and Beresford Avenue | Brent Council Transport for London London Buses Development | Increased frequency and capacity and additional bus stops. |

### 11.0 Making it happen

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### 11.7 Site development dependencies

The masterplan does not include a phasing plan since the land is almost exclusively within private control. However the nature of the masterplan requires an understanding of dependencies related to specific sites, where ownerships and development sites site adjacent to each other and street connections transcend boundaries. The following table considers physical infrastructure items that require deliv-

| Development Site | Infrastructure dependency | Additional interventions |
| :---: | :---: | :---: |
| Alperton House, Bridgewater Road | Public realm and pedestrian crossing at Ealing Road Connection from Ealing Road to canal offside edge Canal offside edge improvements | Basin or shallow basin Commercial space |
| Middlesex House, Ealing Road 0 0 | Improved access to the canalside towpath | Boundary treatment to canalside towpath and Ealing Road |
| ©inavil House, Ealing Road か | Ealing Road widening and alignment works Introduction of access to canal offside from Ealing Road | Commercial space |
| Former B\&Q superstore, Ealing Road | Public space <br> Access from canalside towpath to Ealing Road <br> Canalside towpath improvements <br> Pedestrian crossing at Ealing Road to connect with Northwick Road | Community/commercial space Boundary treatment to Ealing Road |
| Atlip Road, off Ealing Road | Alperton Station square public space and public realm interventions <br> Connection to new street delivered to the south as part of the Mount Anvil proposals |  |
|  |  |  |

### 11.0 Making it happen

| Development site | Infrastructure dependency | Additional interventions |
| :---: | :---: | :---: |
| Sunleigh Road, off Mount Pleasant | Connection of Atlip Road to Woodside End Public space Canal offside edge improvements | Community/commercial space <br> Access to the canal alongside/between edge development <br> Corresponding towpath canalside improvements |
| Woodside Avenue, off Mount Pleasant | Connection of Woodside End to Mount Pleasant Connection of Woodside Place to Woodside Close via introduction of new internal street network Public space Integration of triangle site between Woodside Place and Woodside Close Canal offside edge improvements | Community/commercial space Access to the canal alongside/between edge development Corresponding towpath canalside improvements |
| \%ount Pleasant, Beresford Avenue $\stackrel{\rightharpoonup}{\rightharpoonup}$ | Connection of Woodside End to Mount Pleasant Public space Improved crossing access from offside to towpath side <br> Junction realignment between Mount Pleasant and Beresford Avenue <br> Canal offside edge improvements | Community/commercial space Access to the canal alongside/between edge development Corresponding towpath canalside improvements |
| Northfields, Beresford Avenue | Major new vehicular connection to the North Circular Road Footbridge from Beresford Avenue to towpath providing access across to Heather Park Drive open space <br> Public realm at Beresford Avenue crossing to Heather Improved pedestrian route to Stonebridge Park rail station <br> Park Drive open space | Public realm strategy for Abbeydale industrial estate |

### 11.8 Delivering design quality

The council intends to continue to improve design quality in terms of the buildings and their settings, including the public realm. Set out below are a number of tools which could be used at appropriate times to achieve improved design quality.

## Design Review Panel

To broaden the council's approach to assessment of design proposals, a review panel has been established. This will ensure that the council is keeping up with broader standards and comparators throughout London. The panel will develop its role inviting post-completion assessment and critique from which lessons can be learned.

## Submission of 3D Models

In order for the council to fully assess the impacts of the scale and massing of a proposed development, all major applications for devel-
\$ment are encouraged to submit basic 3D models in appropriate
边 D format.

## Dasign Codes

TPe design codes and principles set out in this document should be the primary guidance for any application within the masterplan area and proposals will be expected to fully justify departures.

## Local Planning Policy

Brent Council has established a credible policy framework through the UDP 2004 but it is improving the management of design within the Planning process through carefully composed and structured planning policies, which will be included in the Local Development Framework. The emerging Core Strategy seeks to allow for the use of CABE's 'Towards Excellence' to assess the quality of proposals.

## Supplementary Planning Guidance/Documents

The council considers that the fundamental requirements described as part of its Supplementary Planning Guidance 17 'Design Guide for New Development' are essential to ensure buildings demonstrate appropriate consideration of their context and the requirements of future occupiers.

## Strategic Coordination

Brent Council will develop its strategic design aspirations by coordinating policy and ambition with that of regional and national agencies, including CABE, GLA, EH, Design for London and other design focused organisations. Co-operation with and between these agencies will help create a credible and realistic policy base, enabling certainty from which high quality design can be brought forward.

## Design Champion

The council has an elected member who promotes good design as a principal consideration throughout all of the council's endeavours and activities. The Design Champion will expect the highest quality design in all proposals for redevelopment.

## Competitive Interviews \& Competitions

Where possible the council will encourage the procurement of significant landmark or signature buildings through competition. This should ensure the highest standards of design and innovation. The high quality architecture will set an example for others wishing to develop within Brent.

## Approved Architects List

A list of architects with experience and reputations for providing high quality design schemes will be developed. It will provide a professional resource for those wishing to develop within Brent and a database of practices from which invitees to competitions could be taken.

## Pre-application Advice

In order to expedite development proposals through the planning process and ensure the delivery of exemplar buildings, the council will offer pre-application advice through its Planning Service.

## Rigorous Design Statements

The council will require the submission of a thorough Design and Access Statement explaining the reasoning and philosophy behind a design including considerations of materials and details.

### 11.0 Making it happen

## Consultation Procedures

Often it is the shock of change, rather than the nature of change that causes problems in the delivery of good design. Brent Council will encourage applicants to carry out detailed and comprehensive independent consultation with local communities impacted by proposals. Consultation will enable local residents to be involved in the process of design development. All major landowners and key stakeholders, including the owner and/or operator of the National Stadium, should be consulted on all major developments. The Metropolitan Police Authority should be consulted on any proposed development consisting of over 100 residential units, 5,000 m² of floor space or 100 car parking spaces. Brent Council will also carry out its statutory duties in consulting with the local community before granting permissions.

## Design for Living

爵h quality design is not just about aesthetics, it must consider the Qeds of people, the quality of their lives and the environment in Wich they live, work and play. The assessment of design must go further than the external appearance of the building; it must consider the quality of the internal and external spaces to ensure that they are adequate for the needs of all potential occupants.

## Appendix 1

## Masterplan process

Alperton was initially identified for growth in 2005 through the preparation of the Core Strategy which was formally adopted as planning policy by the Council in July 2010. Sustainability Appraisal of growth and development in Alperton has been provided by the appraisal of the Core Strategy and Site Specific Allocations Development Plan Documents.

Masterplan preparation began with a visioning exercise in the summer of 2009. The importance of a robust vision document was established at the outset to set an ambitious aspiration and harness support from stakeholders. The vision was drafted through informal but extensive consultation with local businesses, residents (through community leaders and interviews in the street), school children and shoppers as well organisations such as British Waterways, the Greater London Authorand Transport for London. Consultants Fluid worked with LB Brent during this stage. N
Since Autumn 2009 the document has been developed in house by Brent Council with the support of CABE, the GLA, British Waterways and consultants MVA Transport.

Adoption of the masterplan as a Supplementary Planning Document requires at least six weeks of public consultation prior to seeking approval and adoption at Executive.

## Appendix 2

## Policy References

Brent Local Development Framework: Core Strategy
(adopted 2010).
Brent Local Development Framework: draft Site Specific Allocations (Examination in Public 2010).

Brent Supplementary Planning Document: Planning Obligations (2008).

Brent Supplementary Planning Guidance 17: Design
iUlide for New Development (200\#).
$\stackrel{\square}{\circ}$
ANayor of London: London Plan (consolidated with alterations 2008).

Mayor of London Park Royal Opportunity Area Planning Framework (2010).

Brent Affordable Housing Viability Study 2009
Brent Employment Land Study 2009
The Brent Placemaking Guide - Final Draft 2010

## Disclaimer

The information contained within this masterplan is, as far as Brent Council is aware, correct. However, developers should satisfy themselves about any information contained within it. The council is not responsible for any loss arising from any error of information contained in the document. Potential purchasers and developers are advised to consult the relevant Brent Council officers about their specific proposals before making any application for redevelopment within this area. The masterplan does not bind Brent Council to grant consent for any particular development within the area.

| Reference No | Name | Summary of representation | Policy heading | Councils response | How the SPD has been altered |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A001.0 | P Premasiri | Thank you very much for your letter and I give full support | Supportive comment | Supportive comment noted | No change proposed |
| A002.0 | Mahesh | I am strongly opposed to building more housing in alperton. It is already very over-crowded and any bit of land remaining is now taken up by housing. We are not attracting the right type of persons to the neighbourhood and this is shown by the new buildings on the old Alpine Horn pubsite and also new buildings nest to Clay Oven behind the old Dadoos supermarket. | Housing/ density | Response: The decision to support growth in Alperton was already set out in the Core Strategy as one of the Boroughs Growth Areas. The Core Strategy (CP2) sets out the borough's plan for a sustainable population growth of 28,000 people by 2017 and the provision of at least 22,000 additional homes between 2007 and 2026. Over $85 \%$ of these new homes will be delivered in five growth areas, one of which is Alperton, where mixed use regeneration is identified as having the capacity to delivery a minimum of 1,600 new homes. The masterplan has tested the acceptability of this target, which is also informed by the LDF Site Specific Allocations. No changes are proposed to the masterplan. |  |
| A002.1 | Mahesh | Any opportunity now I feel is being used to for social housing the council does very little to attract young professionals to Alperton and it is degrading the borough. | Housing/ density | The Masterplan is in line with London Plan and LDF policy in setting a strategic target that 50\% of new homes on development sites with the capacity to deliver 10 or more homes should be affordable. Affordable housing includes both affordable rented homes for people on the housing waiting list as well as intermediate homes below market prices and rents for more economically active people. The Alperton Masterplan provides guidance that supports development and growth across three distinct character areas that will deliver housing that will be able to meet a diverse range of housing needs, including a strong element of family housing for which there is a pressing need in the borough. | No change proposed |
| $\begin{aligned} & \stackrel{A}{A 002.2}_{A^{2}}^{N} \\ & \mathrm{U} \end{aligned}$ | Mahesh | The streets around the Sams Chicken shop are flithy full of litter. And young local polish men use the top of Sunleigh Road as an area to drink alcohol openly which for many young children, elderly people and women can be unerving especially on dark winter nights. I have seen no signs of improving this anti-socail behaviour and here we have a plan to add 1600 new homes I would be interesed to see what type of clients have been targeted for this housing I assume it to be people waiting on the social housing list. Because living in the borough since 1986 I have never seen it in such a bad shape. | ASB | Response: While the masterplan cannot deal with every individual or particular problems related to ASB, it does provide support to ensure that in planning dwellings and neighbourhoods attention is given to planning out crime by adopting important design principles such as ensuring overlooking of spaces, providing good lines of sight and so-on. An amendment is proposed in section 4.0 to underline this important issue. It it is recognised that the council will need to work closely with other teams including SNT, parks and streetcare as the area is developed to tackle such issuesand section 11.1 has been updated to show this. | 4.0 Achieving the vision 11.1 Working with partners |
| A002. 3 | Mahesh | The council seems to want to cram in more and more people into the brough without improving the infrastructure I can only make comments on what I see around me the housing development on the Alpine Horn site, the site next to Clay Oven, the site of the old Chequers pub on Ealing Road, the site of the Sainsbury supermarket the list is endless. It seems to me the borough is intent on this ugly high rise tower blocks. | Physical and social infrastructure | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision <br> 7.3 Destinations and places |
| A002.4 | Mahesh | I strongly oppose any further building of housing we now need to stop and look at building some facilites for existing residents there are very few entertainment areas in the borough and a very depressing place to live. | as above | as above | 4.0 Achieving the vision <br> 7.3 Destinations and places |

[^2]| A003.1 | tracey phipps | After seeing the draft master plan and listening to the presentation that Beth Kay gave at our neighbourhood watch scheme meeting i am very concerned in regard to the following: <br> parking especially in relation to the proposed development of homes on the Beresford Ave site, currently we do not have or wish to have controlled parking in this area and with the amount of dwellings planned to be built i fore see a definate parking problem which will impact on the streets around Beresford Ave. | Transport | Response: The proposals in the masterplan have been designed so that, using the average parking ratios set out in Section 7.4, all new cars introduced to the area can be accommodated within the growth area boundary using a combination of on and off street parking. Car clubs and car sharing will also be encouraged in new development to reduce car use. If new development has an affect on parking availability on existing streets then the introduciton of controlled parking should be considered if it is in the interest of existing residents. Some residents have suggested that a multi storey car park should be built or developments should consider underground car parking, neither of these solutions have been proposed in the masterplan as they are considered to be unviable and contrary to sustainable development and the design principles of the masterplan Section 7.4 has been updated to reinforce this approach. | 7.4 Reducing car use |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A003.2 | tracey phipps | I also see a problem with congestion around these sites especially during rush hour times, with heavy plant coming and going and materials being delivered to the sites. This area is already very busy and local residents and businesses will be very inconvenienced from site traffic. | Transport | Response: Minimising disturbance and inconvenience to the existing community caused by the construction site will be dealt with by condition with each project that gets planning permission. Site delivery times can be restricted if necessary and contractors are required to be considerate at all times through the considerate contractor scheme. | No change proposed |
| A003.3 <br>  <br> 0 <br> 0 <br> 0 <br> 0 | tracey phipps | The heather park open space is very popular during the summer with young football and cricket enthusiast, currently residents endure problems as a result of their fencing getting damaged and broken by footballs. Even more children using this small area will further impact on the current problems. <br> Further open space/park areas will need to be made with better play facilities for children and teenagers . | Physical and social infrastructure | Response: Section 7.3 - describes the councils approach to meeting open space requirements in Alperton, which includes improving existing open space and proposing locations of new open spaces which can be delivered through development. It has been noted that this section should provide more detail on how open spaces can be improved with a clear reference back to CP8 -Protection and enhancement of Open Space and the requirements of the Infrastructure Investment Framework. | 7.3 Destinations and places |
| $\mathrm{A}^{(03.4}$ | tracey phipps | i feel consideration also needs to be given to local amenties such as doctors surgeries, schools and hospitals, more will need to be built. | Amenities | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision 7.3 Destinations and places |
| A003.5 | tracey phipps | Around the heather park open space area the housing is currently low level, the Beresford Ave proposed development would need to be the same, no high rise structures. | Housing/ density | Response: The council has carried out a significant amount of testing of the layouts that are illustrated in the masterplan. Proposals within the central character area aim to show how the compact and tight-knit character described in the vision can be achieved whilst being sympathetic with the surrounding building heights and maintaining the spirit of existing planning requirements. The masterplan is intended to be clear about the scale of development that the council and local community expect whilst at the same time being flexible. In response to these comments Section 4.0 and Section 9.0 has been updated to reflect some of the comments received from developer/ landowners for example it has been made clear that maps and diagrams are for illustrative purposes only and that future applications will not be held up against them to get an exact match. | 4.0 Achieving the vision 9.0 Waterside neighbourhood |
| A003.6 | tracey phipps | I hope also hope areas will be set aside for nature, for dog walkers and ramblers to enjoy. | Environmental Sustainability | Response: Section 7.5 has been updated to include more guidance on sustainable development including relevant biodiversity and canal-side protection and enhancement measures which will be sought from development proposals and an additional section 7.6 has been added on Environmental Protection. | 7.3 Destinations and places |
| A004.0 | Sainsbury's Supermarkets Ltd | "Sainsbury's Supermarkets Ltd; is generally supportive of the draft Alperton Masterplan. We endorse the Masterplan's identification of the Sainsbury's store as a 'retail destination' and we support all proposals to improve pedestrian access to the site. | Supportive comment | Supportive comment noted | No change proposed |


| A004.1 | Sainsbury's Supermarkets Ltd | We would like the Masterplan to go one step further and identify the Sainsbury's store as a suitable site for the intensification of employment generating uses as set out in PPS4." | CA1 | The Sainsbury's store has not been identified for growth within the LDF Core Strategy DPD or the impending Site Specific Allocations DPD and it is not possible to allocate sites for within this SPD if not in conformaty with the DPDs. Furthermore, in the absense of detail, it could be premature to allocate the site without proper regard for the tests within PPS4 at this stage. The LPA is available for discussion regarding proposals should these materialise. | No amendment proposed |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A005.0 | Natural England | Linkage to Core Strategy Policies and Objectives <br> With regards to green space provision, biodiversity enhancement and climate change mitigation and adaptation, we are of the opinion that the Masterplan does not go far enough in delivering the following Core Strategy Policies and Objectives: <br> - Core Policy 18 - Protection and Enhancement of Open Space, Sports and Biodiversity. <br> - Core Policy 8 - Alperton Growth Area. <br> - Core Policy 19 - Climate Change Mitigation and Adaptation Measures. <br> - Core Strategy Objective 9 - To protect and enhance Brent's environment. <br> - Core Strategy Objective 10 - To achieve sustainable development, mitigate \& adapt to climate change. | Physical and social infrastructure | It is recognised that the masterplan needs to detail what open space improvements are proposed and the strategy to respond to CP8 open space infrastructure requirements, this will be covered in section 7.3 . All proposals in Alperton will be expected to comply with existing SPG19 Sustainable Design and Construction, and it is recognised that the masterplan could be improved to include reference to measures specific to Alperton and climate change adaptation measures which are not as fully covered in SPG19. | 7.3 Destinations and places <br> 7.5 Environmental sustainability |
| A005.1 <br> 0 <br> 0 | Natural England | The Masterplan states that regeneration will deliver an attractive high quality environment, however, there is little reference to the natural environment. Although reference is made to plans for improving access to nature conservation sites (e.g. Royal Park and the Royal Union Canal), the document does not mention proposals for greenspace creation and enhancement. Greenspace protection, creation and enhancement should be addressed within this document. The Masterplan also states that the Grand Union Canal is to be opened up. This document should detail how the Canal will be protected and enhanced. | Environmental Sustainability | Response: Section 7.5 has been updated to include more guidance on sustainable development including relevant biodiversity and canal-side protection and enhancement measures which will be sought from development proposals and an additional section 7.6 has been added on Environmental Protection. | 7.5 Environmental Sustainability 7.6 Environmental Protection |
|  | Natural England | Biodiversity and Landscape Enhancement <br> The following resources can assist the council with developing landscape enhancement proposals: <br> 1. London BAP Habitat Suitability maps, produced by Greenspace Information for Greater London (GiGL). These maps provide detailed information and guidance with regards to the suitability of creating habitats across Greater London: http://www.gigl.org.uk/Resources/Habitats/tabid/107/Default.aspx. This application can assist the council with delivering high quality Biodiversity Action Plan (BAP) habitat in line with Brent's BAP targets. <br> 2. The London Regional Landscape Framework, can assist the council with ensuring that the built and natural environments are connected and that the natural landscape of the area is considered within regeneration masterplan <br> http://www.naturalengland.org.uk/regions/london/ourwork/wildlondon/naturalsignatures/default.aspx | as above | as above | 7.5 Environmental Sustainability 7.6 Environmental Protection |
| A005.3 | Natural England | The regeneration principles outlined in the Masterplan need to be aligned closer to Core Strategy Policies (e.g. CP 8Alperton Growth Area and CP 18 - Protection and Enhancement of Open Space, Sports and Biodiversity). CP 8 states that 'the environment and the heritage of the canal will be the heart of the new community, providing amenity and connectivity'. However, the Masterplan does not reference and detail how the natural environment will be connected. In addition, aligning the Core Strategy proposals with the Alperton Masterplan is especially important with regards to Core Strategy Policy 19 (Climate Change Mitigation and Adaptation Measures) as there appears to be no mention of climate change, or consideration of mitigation and/or adaptation measures, proposed within the regeneration plan. We recommend that the Masterplan expands to address biodiversity/ landscape enhancement and climate change under individual sections. This can enable clear proposals to be established with regards to landscape enhancement and climate change mitigation/adaptation. [0 | Environmental Sustainability | The council accepts the recommendation that that Masterplan is expanded to included detail on biodiversity and climate change. This will be included in section 7.5 . | 7.3 Destinations and places <br> 7.5 Environmental sustainability |
| A005.4 | Natural England | We also recommend that Green Infrastructure (GI) be referenced within the Masterplan. GI refers to a network of greenspaces, places and features that thread through and surround urban areas. This includes public and private spaces, such as parks, gardens, allotments, cemeteries, trees, green roofs and natural habitats such as woodlands, grasslands and wetlands. GI can provide a range of benefits to the landscape, including enhancing greenspace and increasing wildlife connectivity, mitigating and adapting landscapes to climate change, improving a sense of place and providing areas for natural play. | as above | as above | 7.5 Environmental Sustainability 7.6 Environmental Protection |

Table of consultation comments

| A006.0 | Queen Victoria Ave RA | LONDON BOROUGH OF BRENT - ALPERTON MASTERPLAN SUPPLEMENTARY PLANNING DOCUMENT DRAFT CONSULTATION A 5 JANUARY 2011-25 FEBRUARY 2011 <br> The following is an appraisal of comments \concerns made by the residents of above neighbourhood areas in relation to the above Draft Masterplan. It is the intention of the residents to contribute to the process by highlighting the existing situation and circumstances and to propose necessary solutions to be incorporated in the adopted Supplementary Planning Document in May 2011. This document is supported by the residents by way of signed petition which is attached to this document. <br> INTRODUCTION <br> The draft document and Councils Plans are acknowledged and received as positive way forward for the area in general, however, the Masterplan is poorly prepared and lacks many important aspects that will ensure its proper implementation and maintenance without deteriorating it into future degeneration as history has proved in the BOROUGH (Stonebridge Park, Wembley Park and other similar estates built during the sixties \seventies) | Supportive comment | Supportive comment noted | No change proposed |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A006.1 <br>  <br>  <br> 0 | Queen Victoria Ave RA | ALPERTON MASTERPLAN DRAFT A <br> The draft document which was allegedly presented to the all local residents and neighbourhood areas had apparently failed to promote it in the streets in question which surround the Tree Hill Park (HR, QVA, NR, ER, BR, BA, and SJC \& BWR) Tree Hill Park is proposed in the document as one of the three main public open spaces for the 1600 new dwellings which are to be created. The document does not sufficiently demonstrate if the proposals have made any allowances for the creation of a further more local green open space\s for the new dwellings and therefore it is felt that the proposals will inevitably put further pressure on the three existing open spaces. The comments in this document are specifically related to the Tree Hill Park to the west of the proposed designated area of regeneration. It is indicated that the Masterplan proposes to create further pedestrian links to the THP; however, the document fails to provide specific information as to how this is to be achieved? | Physical and social infrastructure | Response: Section 7.3 - describes the councils approach to meeting open space requirements in Alperton, which includes improving existing open space and proposing locations of new open spaces which can be delivered through development. It has been noted that this section should provide more detail on how open spaces can be improved with a clear reference back to CP8 -Protection and enhancement of Open Space and the requirements of the Infrastructure Investment Framework. | 7.3 Destinations and places |
| $\begin{aligned} & \text { (AB)06.10 } \\ & \text { D } \\ & \cdots \\ & \mathrm{N} \\ & \hline 0 \end{aligned}$ | Queen Victoria Ave RA | INTRODUCTION OF SECTION 106 IN THE TERMS OF APPROVAL TO THE DEVELOPER TO PROVIDE THE FOLLWOING MEASURES FOR IMPROVEMENT <br> 1. FUNDNIG FOR PARK PETROL DURING NIGHTTIME HOURS 11PM TO EARLY HOURS <br> 2. SECURING THE PARK AT ALL ACCESS POINTS BY PROVIDNG LOCKABLE GATES EVERY NIGHT AT ALL TIMES (365 DAYS) <br> 3. FINANCIAL CONTRIBUTIONS TOWARDS SAFETY, MAINTENANCE AND PARK WARDENS TO ENABLE SAFE AND trouble free open Space <br> 4. PROVISION OF ALLOTMENTS TO CREATE A SEPARATION BETWEEN THE RESIDENTIAL PROPERTIES AND THE PARK TO ENSURE ADEQUATE BUFFER ZONE TO DISTANCE ANTI-SOCIAL ELEMENTS | Public Realm | Response: Brent Councils Placemaking Guide sets out the importance of having an adequately funded and coordinated street management and maintenance regime, all Council departments and other agencies whose actions have an impact on the public realm must adopt a philosophy of care and better design in the first instance can reduce maintenance costs in the long term. Section 7.3 has been updated to give stronger links back to the Brent Placemaking Guide and with more emphasis on management and maintenance. | 7.3 Destinations and places |
| A006.2 | Queen Victoria Ave RA | It is our view that this document is very poor in its content and has elements that are not properly researched and others omitted completely whether intentionally or otherwise. Whilst it is accepted that council has rightly identified the areas for future growth and generation of employment, it is generally felt that the high density high rise elements of social mix will generate more anti-social elements and will require better design, planning, safety security and allowance for future maintenance of the open spaces. There is no evidence of any of these elements in the draft document and therefore difficult to accept it as a serious attempt to create safe and better built environment for the future generations. Second main concern is the creation of 1600 new dwelling units that are suggested in the Masterplan can only be achieved by way of very high rise blocks, which are regrettable and will undoubtedly prove to be a disaster in years to come. Blocks of high rise flats if not properly managed, and maintained cause a serious decay over the years and attract elements of society and ultimately results in its demolition. History has proved this time and again and yet this route has been chosen without any care or due diligence. It is not too late and we make an urgent plea to stop this before it progresses further. Such a decision does not justify the long term interests of the area needs to be seriously reconsidered and improved before it is implemented. | Housing/ density | Response: The masterplan actually restricts taller, higher density housing to one area at the junction of Ealing Road and the canal near to Alperton Station. This area is considered suitable for higher density housing as it has good public transport links and is well served by a range of local services and amenities. Further, this area is characterised by taller buildings, such as Middlesex House, the recently completed development on Atlip Road, and the permitted proposal for the $B \& Q$ site, and therefore this form of development is considered to be in keeping with the existing built environment. No changes to the masterplan are proposed. | No change proposed |

Table of consultation comments

| A006. 3 | Queen Victoria Ave RA | TREE HILL PARK - EXISTING PUBLIC OPEN SPACE <br> CURRENT CONCERNS <br> (AS THEY EXIST PRIOR TO THE IMPLEMENTATION OF THE MASTERPLAN) <br> We as residents have a lot of concerns regarding the proposals. Following are some of the major problems we are currently faced with around Tree Hill Park; <br> - Issues around anti-social elements blight lives of people who live on the periphery of the public open spaces and is constantly under threat of violent behaviour of thugs and drug dealers <br> - Young children using the playground facilities are not allowed by teenage gangs who hog the play equipment <br> - Basket ball hard court is used for cricket and football causing all year round havoc <br> - Cricket and football is played adjacent to fences and damaging private properties <br> - Anti-social behaviour after dark causes damage to equipment, lighting, and furniture creating graffiti in the dark on a regular basis <br> - drug taking and noise with violent behaviour is a constant problem during weekends, starting from Friday nights after 10pm through the mid-night until early morning hours | ASB | Response: While the masterplan cannot deal with every individual or particular problems related to ASB, it does provide support to ensure that in planning dwellings and neighbourhoods attention is given to planning out crime by adopting important design principles such as ensuring overlooking of spaces, providing good lines of sight and so-on. An amendment is proposed in section 4.0 to underline this important issue. It it is recognised that the council will need to work closely with other teams including SNT, parks and streetcare as the area is developed to tackle such issuesand section 11.1 has been updated to show this. | 4.0 Achieving the vision 11.1 Working with partners |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | Queen Victoria Ave RA | - With the recent implementation of new open access gates from QVA has resulted in motorcycles racing taking place in the park at night and cyclists are also riding at high speeds from the public footpath which is a hazard and is a potential for a serious accident to happen? <br> - Persistent underage alcohol abuse takes place at Tree Hill park resulting in urinating and defecating of the footpaths in the park which is now a major concern <br> - There is zero surveillance by police or neighbourhood teams during weekends and night time when most of the trouble is taking place <br> - Evenings are a nightmare where gangs park cars and consume alcohol and leave bottles and debri on the roads at access points to the park thus creating lot of nuisance to the residents <br> - Lately lot of dog owners are using the park and not following the law by collecting dog faeces is causing a major nuisance to the users of the park and young children are at risk <br> - Visits by owners of dangerous dogs are fast becoming a major hazard - dogs are brought in vans and vehicles which is a becoming a threat to all users <br> - Cars are parked on double yellow lines and private drives are blocked without any traffic supervision <br> - During October \November months 2010 there is large amount of heavy duty fireworks being set late at nights by gangs - main threat being posed to private property as the fireworks are set off very close and in the direction of the surrounding properties during hours of midnight and early hours | Public Realm | Response: Brent Councils Placemaking Guide sets out the importance of having an adequately funded and coordinated street management and maintenance regime, all Council departments and other agencies whose actions have an impact on the public realm must adopt a philosophy of care and better design in the first instance can reduce maintenance costs in the long term. Section 7.3 has been updated to give stronger links back to the Brent Placemaking Guide and with more emphasis on management and maintenance. | 7.3 Destinations and places |
| A006.5 | Queen Victoria Ave RA | RESIDENTS MAJOR CONCERNS RELATING TO THE PROPOSED MASTER PLAN <br> - The principles of the proposal are acceptable and there are no objections to the regeneration plans <br> - The density and height of the development is of grave concern to the residents <br> - Mixed use of the proposed parcels of the land are not acceptable to the residents <br> - Mixed use developments in conjunction with high density social housing is doomed to failure based on past examples and therefore not supported. E.g. GEC Estate development by Balfour Beatty on East Lane is a disaster and a failure and additionally the traffic density has tripled on East Lane. <br> - The proposal for 1600 new dwellings will impact the Tree Hill Public Open space and enormously increase the existing anti-social problems faced and the residents are opposed to this increase without addressing the issues as highlighted above | Housing/ density | The adopted Core Strategy of the Brent Local Development Framework identifies the Alperton Growth Area for approximately 1600 new homes alongside supporting community infrastructure and local needs retail, over a period expected up to 2026. The residential is proposed to be mixed tenure (ie market housing and affordable housing) and a mix of densities to help secure a sizable proportion of family housing. The highest density housing is proposed to be located close to public transport, as suggested by national and regional planning policy. Most of the non residential development is likley to be accommodated within the Alperton Core character area, while smaller more localised non residential uses could be located alongside the new small open spaces. All new development will be expected to contribute to the improvements to facilities or access to existing open spaces. | No changes proposed |
| A006.5 | Queen Victoria Ave RA | - The increased access to the park without controls in the Masterplan is not acceptable and opposed by the residents <br> - Master plans has not addressed any issues relating to safer neighbourhood policy and neglected a major concern of all residents <br> High rise developments do not blend well with the existing surrounding streetscape and the residents are totally opposed to this in the Masterplan. <br> - The residents are concerned that Tree Hill Park is the largest open space in the area however by its definition as a 'Public Open Space' it does not receive any resources to tackle the anti-social problems faced and as such this activity will be further intensified. <br> - Issues raised in the first part of the Masterplan are not adequately addressed and it has been decided to carry this plan forward for approval by the Executive Committee and it should be subject to legal public hearing | as above | as above | 7.3 Destinations and places |

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| A006.7 | Queen Victoria Ave RA | RESIDENTS WISHES AND PROPOSED SOLUTIONS TO BE INCORPORATED IN THE DRAFT MASTERPLAN Following are some of the measures that the residents wish to be incorporated in the Masterplan to make it more acceptable and sustainable in terms of its viability; <br> ® SAFETY \& SECURITY (LIGHTING, CAMERAS, ETC) <br> @ MAKE ALLOWANCE TO TACKLE ANTI-SOCIAL ELEMENTS <br> - CONSIDER CHAING THE STATUS FROM ‘PUBLIC OPEN SPACE’ TO A ‘PUBLIC PARK’ WHICH WILL ATTRACT MORE RESOURCES <br> ®ADULT BALL SPORTS - SHOULD BE DISCOURAGED AND ENFORCED TO STOP | as above | as above | 4.0 Achieving the vision 11.1 Working with partners |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A006. 8 | Queen Victoria Ave RA | © DOGS - DEAL WITH THIS MAJOR PROLEM <br> @ WASTE COLLECTION MONITOR AND IMPLEMENT A CLEAN PARK POLICY <br> @ STREET LIGHTING IN THE FOOTPATHS NEED TO BE MAINTAINED <br> Q MONITORING \& ENFORCEMENT OF PARK <br> @ CONSIDER A PARK WARDEN AND NIGHT TIME CLOSURE OF PARK BY SECURING THE ACCESS POINTS AS IN OTHER <br> PARTS OF LONDON <br> @ PROVIDE NEIGHBOURHOOD WATCH DURING OUT OF HOURS TIMES WHEN THE PROBLEMS ARE GREATEST <br> © CATCH AND PUNISH GRAFFITI CREATORS HARSHLY <br> © HOLD FUTURE CONSULTATIONS\MEETINGS | as above | as above | 4.0 Achieving the vision 11.1 Working with partners |
| A006.9 <br>  <br> $D$ <br> 0 <br> $D$ <br> 1 <br> 0 | Queen Victoria Ave RA | @ SEEK CONTRIBUTIONS FROM RESIDENTS TOWARDS CCTV CAMERA INSTALLATIONS <br> @ CHARGE DRUG DEALERS AND GANGS WHO operate in the area as it is considered a soft spot <br> a traffic management issues during summer months on all strees surrounding the parksiopen SPACES <br> a ADOPT CRIME PREVENTION POLICY bEFORE DURING AND AFTER IMPLEMENTATION OF THE MASTERPLAN <br> Qensure the final scheme includes special care and attention to the above to justify a mixed use HIGH DENSITY SOCIAL POLICY <br> QLEARN FROM EARLIER FAILED MASTER PLANS AND ADOPT NEW METHODS TO PROVIDE SECURE FACE AND WORTH While environment for the local residents <br> © ENHANCE AREAS AND AVOID CREATION OF GHETTOS FOR SOCIAL UNREST AND VIOLENT BEHAVIOUR BY SMALL MINORITY | as above | as above | 4.0 Achieving the vision 11.1 Working with partners |
| A007.0 | ABBEY ESTATES LLP | 1. Introduction <br> We act on behalf of Abbey Estates LLP which is the owner of parcels of land within the central part of the Masterplan area (Sunleigh Road A5 and Woodside Avenue A6) and are pleased for the opportunity to take part in this consultation process. Our client has been pursuing the redevelopment of the land for a number of years and has taken part in the development of planning policy via the Core Strategy and the Site Specific Allocations Document. In addition, a number of meetings have been held with the Council's Planning Department. <br> Our Client remains keen to take forward redevelopment in the near future and welcomes the Council's Masterplan approach as a facilitator. | Supportive comment | Supportive comment noted | No change proposed |
| A007.01 | ABBEY ESTATES LLP | 2. 7.0 Alperton Tomorrow (Pages 20-23) <br> The Masterplan contains development layouts and 3-D images which we trust are only illustrative of one approach to development and not prescriptive. Whilst we appreciate that the Council has invested a good deal of time and expertise in drawing up the Masterplan, we assume that it does not wish to stifle innovation in design and will allow other forms of layout and building forms subject to these meeting the Council's aspirations for the redevelopment of the area. | Housing/ density | Response: The council has carried out a significant amount of testing of the layouts that are illustrated in the masterplan. Proposals within the central character area aim to show how the compact and tight-knit character described in the vision can be achieved whilst being sympathetic with the surrounding building heights and maintaining the spirit of existing planning requirements. The masterplan is intended to be clear about the scale of development that the council and local community expect whilst at the same time being flexible. In response to these comments Section 4.0 and Section 9.0 has been updated to reflect some of the comments received from developer/ landowners for example it has been made clear that maps and diagrams are for illustrative purposes only and that future applications will not be held up against them to get an exact match. | 4.0 Achieving the vision <br> 9.0 Waterside neighbourhood |

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| A007.02 | ABBEY ESTATES LLP | Assuming this to be the case, it would be helpful if the Masterplan could make clear that the layout and building form content of the document are only included for illustration and that other forms of development (subject to meeting the Council's other policy requirements) would not be found non-compliant. <br> These general comments also apply to the other layouts and 3-D images within the document, including at pages 41, 43 and 45. | as above | as above | 4.0 Achieving the vision 9.0 Waterside neighbourhood |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A007.04 | ABBEY ESTATES LLP | In parallel, the illustrative drawings show inlets from the Canal which appear to be used for mooring. The creation of such water spaces can be an expensive and complicated process and may not prove possible for viability or physical reasons. It would be helpful, therefore, if the Masterplan could make clear that such inlets are acceptable but not essential in any forthcoming development. | Waterside development | Response: The masterplan promotes the installation of a range of types of additional mooring points along the canal in appropriate locations and these have been proved to be deliverable by developments on the ground. To introduce canalside character alongside new developments, the masterplan does also suggest that it may be possible to introduce inlets at appropriate locations, which may be full depth or shallow constructions. The deliverability of specific proposals (technical and financial) would need to be properly investigated through the planning process. | 7.1 A canal runs through it 10.0 Northfields |
| A007.05 | ABBEY ESTATES LLP | 3. 9.0 Waterside Neighbourhood <br> Again, it is assumed that the suggested layout and form of development on pages 41 and 45 are not prescriptive and we request that this be made clear in the Masterplan text. Acceptable development could, clearly, be brought forward in other forms and we question why certain parts are only proposed for single storey development given the ongoing emphasis on the optimum use of Brownfield Sites. | as above | Comments as above, in addition the Council advises that single storey development has not been proposed. | as above |
| $\begin{aligned} & \text { A007.06 } \\ & \hline 0 \\ & 0 \\ & 0 \\ & \hline 0 \end{aligned}$ | ABBEY ESTATES LLP | Our client appreciates the Council's flexible approach to the application of planning policy standards in order to make the most of this regeneration site and achieve an attractive and sensitive layout which creates its own character. However, we do not believe that it is essential for development to be restricted to 3 storeys despite the presence of existing residential properties on neighbouring sites. Certainly, there appears to be no obvious need to apply a 3 storey height limit for properties on the canal edge where residential properties are remote. | as above | as above | 4.0 Achieving the vision 9.0 Waterside neighbourhood |
| $6007.07$ | ABBEY ESTATES LLP | In line with previous comments, our client does not feel that the Masterplan needs to be specific on building heights but, rather, set objectives for the creation of a form of development which respects the existing context and the privacy of existing and proposed residents of the area. This might simply be achieved by annotation to note that the North-South section through the Waterside Neighbourhood is illustrative only and the removal of the second bulletpoint on page 42. | Housing/ density | Response: As suggested within the document, the proposed masterplan is one interpretation of how development could come forward in Alperton, around suggested principles of streets and connections, adjacencies, use, character and housing mix. Suggested building heights are included to further explain the suggested interpretation and show consideration of the impact on adjacent and existing dwellings. Section 4.0 has been updated to make this intention clearer. | 4.0 Achieving the vision |
| A007.08 | ABBEY ESTATES LLP | Our client is also somewhat concerned that the Masterplan is predetermining the mix of unit types -the third bulletpoint stating that the new homes will largely consist of maisonettes and town houses with doors on the street. Redevelopment must, to a large degree, respond to market demand albeit that this need not compromise the Council's objectives for the design character and quality of the area. However, there is nothing within the Masterplan which suggests that maisonettes and town house are the only way of achieving this character or the street level activity which seem to be the aspiration. Developments with doors at street level and active frontages with natural surveillance can be achieved in a variety of residential forms and this should be recognised in the Masterplan. Consequently, we request that the third bullet-point be reworded to phrasing along or similar to the following lines; | as above | as above | 4.0 Achieving the vision |
| A007.09 | ABBEY ESTATES LLP | "Residential development which creates street activity and natural surveillance." <br> The fifth bullet point on page 42 makes reference to commercial activity within studios, workspaces and local shops. The Site Allocation is rather more extensive and refers to Use Classes B1, D1 and A. It would be more consistent if the Masterplan continued the type of Uses already recognised as acceptable in the Site Allocations Document. | SSA | Accepted. Propose changes to this section of the document to be more in line with types of uses suggested within the Site Specific Allocations Document. | 9.1 Regeneration principles |

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| A007.10 | ABBEY ESTATES LLP | 4. 9.3 Housing Types <br> The Table on page 46 suggests a total of 300 residential units across a range of unit sizes and tenures. However, the Site Allocations Document identifies Sites A5 and A6 for a total of 400 units -with this figure not set as a ceiling. For conformity, the Masterplan should reflect the 400 units included within the higher tier policy document. | SSA | as above | as above |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A007.11 | ABBEY ESTATES LLP | Our client is also surprised to note that the affordable rented and intermediate housing amounts to $77 \%$ of the total number of units, whereas the Core Strategy has a target of $50 \%$. There seems to be no obvious basis for the particularly high expectation of affordable housing in this part of the Alperton area. | Viability/ delivery | Response: On the basis of availability of information, the council has a broad understanding of costs and values in the masterplan area and these are not perceived to be prohibitive. The 2009 Affordable Housing Viability Study concludes that although circumstances vary from site to site, it is appropriate for the council to maintain the $50 \%$ borough wide target and this is included within the Adopted LDF Core Strategy (2011). Development proposals that come forward will be tested for viability through the planning process having regard for a number of factors, including the deliver of affordable housing. In any case, it is not possible for the masterplan to introduce a policy that differs from the Core Strategy. | 11.0 Delivery |
|  | ABBEY ESTATES LLP | The provision of affordable housing is, obviously, a material financial consideration in the achievement of a commercial and deliverable regeneration scheme. The Masterplan itself notes that the assembly of land in the Waterside area may lead to additional costs arising from the variety of ownerships. In addition, the Council's Affordable Housing Viability Study recognises the limitations of certain sites to deliver high levels of affordable housing. This latter document notes the additional financial costs of the remediation of former industrial sites to be used for residential and concludes that; <br> "We do not consider there to be sufficient evidence that sites in industrial use could necessarily provide more affordable housing than sites with other existing uses in the Borough." | Viability | Response: On the basis of availability of information, the council has a broad understanding of costs and values in the masterplan area and these are not perceived to be prohibitive. The 2009 Affordable Housing Viability Study concludes that although circumstances vary from site to site, it is appropriate for the council to maintain the $50 \%$ borough wide target and this is included within the Adopted LDF Core Strategy (2011). Development proposals that come forward will be tested for viability through the planning process having regard for a number of factors, including the deliver of affordable housing. In any case, it is not possible for the masterplan to introduce a policy that differs from the Core Strategy. |  |
| N | ABBEY ESTATES LLP | The same Study also investigated the question of whether a higher than a $50 \%$ affordable housing target should be adopted on sites of more than ten units. It concluded that the Council should adopt a $50 \%$ affordable housing target on Section 106 sites "which should be applied sensitively, taking full account of individual site circumstances, including financial viability." <br> The Study found that 50\% affordable housing was unlikely to be viable in all market conditions over the Plan period and in all areas across the Borough. It reported; <br> "The results suggest that the delivery of $50 \%$ affordable housing on every single site coming forward for development in the Borough is currently (and is likely to continue to be) an ambitious target that some of the sites coming forward will be unable to achieve." <br> There appears to be no evidence within the Council's background studies or within the Masterplan itself to suggest that the Waterside Neighbourhood could deliver 77\% affordable housing but, rather, to indicate that the costs of site assembly and remediation may make it difficult to achieve the Council's overall target of $50 \%$. For these reasons we request that the Table on page 46 be amended to make clear that no more than $50 \%$ of the indicative 400 total units need be within the affordable category. | Housing/ density | as above |  |
| A007.14 | ABBEY ESTATES LLP | 5. 11.2 Deliverability <br> Whilst we appreciate that the Council has adopted a thorough approach in the production of the draft Masterplan we are unable to find anything within the supporting documents which supports the claims on page 57 that there has been a financial assessment of deliverability and feasibility and that this has been applied in developing the Masterplan proposals. It would be helpful if those involved in the consultation process could also review and comment upon the development appraisal which appears to underpin the Council's understanding of development costs and sales values within the Masterplan proposals. <br> However, our client can confirm that, within the Waterside Neighbourhood, the assembly of land will be expensive and, in addition, so will the remediation and preparation of this contaminated industrial land to make it suitable for residential. [] | Viability | as above |  |

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| A007.15 | ABBEY ESTATES LLP | 6. 11.4 Site Development Dependencies and 11.5 Infrastructure Projects <br> Both sections of the Masterplan refer to "canal offside edge improvements and corresponding towpath canal side improvements" with particular reference to Sunleigh Road and Woodside Avenue. Section 11.5 suggests that development on the offside will pay into a canal fund for works on the towpath side. Our client objects to the assumption that development on the north side of the Canal should not only physically improve and provide access to the waterside but should also fund improvements to the towpath on the opposite side of the Canal. The towpath is the responsibility of British Waterways and it should not be expected that developers providing much needed housing via essential regeneration with associated public realm improvements should also fund the works which are essentially part of British Waterways' responsibility. For these reasons, we request that the Masterplan delete any reference to development also funding towpath improvements on the opposite side of the Canal. <br> Once again, we appreciate the opportunity to take part in the evolution of the Masterplan and would be happy to discuss further the above comments if you feel this would be of help. | Waterside development | Response: Although British Waterways will be principally responsible for the maintenance and upkeep of the tow path, new development in this area is likely to significantly increase the numbers of those using such spaces. The council will work together with developer partners and statutory undertakers in order to ensure that the canal is a successful public space and reasonable contributions to public realm improvements will be sought and negotiated upon as development comes forward. No change to the masterplan is proposed. | No change proposed |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A008.0 | Thames Water Utilities Ltd | Dear Sir or Madam: <br> Thank you for the opportunity to comment on the draft Alperton Masterplan SPD. Thames Water Utilities Ltd (Thames Water) is the statutory sewerage undertaker for the London Borough of Brent and the water supplier for part of the Borough although not the area covered by the proposed SPD. <br> Having reviewed the document and the adopted Core Strategy we have some concerns regarding the potential impact of development on water and wastewater infrastructure. While the SPD is not the place for specific policies in relation to water and wastewater infrastructure it is considered that the SPD should make reference to the issues. We would also like to take this consultation as an opportunity to highlight the issue and promote a suitable supportive policy to be provided in the forthcoming Development Policies DPD. | Environmental Sustainability | Reference to potential impact of development on water and waste water infrastructure and need to demonstrate adequate capacity will be added to section 7.5 . | 7.5 Environmental Sustainability |
| $\begin{aligned} & \mathbf{C O}^{08.1} \\ & (D) \\ & \omega \\ & \omega \end{aligned}$ | Thames Water Utilities Ltd | General Comments <br> Thames Water have previously made comments on the Core Strategy and Site Specific Allocations DPDs in relation to the need to provide supportive policies for water and wastewater infrastructure. <br> Within section 4.84 of the adopted Core Strategy for Brent it is identified that it is vitally important that the necessary supporting infrastructure is adequate if sustainable growth is to be supported. Such infrastructure includes water supply and drainage and sewerage. Section 4.99 of the Core Strategy relates to utilities infrastructure and states that it will have to be demonstrated that adequate capacity exists or can be provided ahead of the occupation of development. However, the requirements of Section 4.99 are not included within a policy in the Core Strategy and Policy CP15 of the Core Strategy focus on major development and infrastructure that can be provided through Section 106 agreements of the CIL. | as above | as above | 7.5 Environmental Sustainability |
| A008.2 | Thames Water Utilities Ltd | It is not only major development that can impact on the water and sewerage infrastructure. Minor developments could also result in adverse impacts such as low/no water pressure or sewer flooding if there is insufficient capacity either on or off site to support the development. Consequently it is essential to ensure that any necessary infrastructure upgrades are provided ahead of the occupation of development. | as above | as above | as above |
| A008.3 | Thames Water Utilities Ltd | The draft SPD states major proposals should have regard to the need for physical infrastructure and that this approach is embedded in Policy CP5 of the Core Strategy. However, Policy CP5 only relates to major proposals in growth areas and regeneration areas. <br> While the supporting text in the Core Strategy highlights the need to demonstrate that utilities infrastructure capacity exists this is not secured through a Policy. Section 106 agreements cannot be used to secure water or wastewater infrastructure upgrades and as such it is necessary for developers to demonstrate that capacity exists or that it can be provided ahead of the occupation of development. | as above | as above | as above |

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| A008. 4 | Thames Water Utilities Ltd | It would not be appropriate to have a policy to secure these requirements within the proposed SPD. However, reference should be made in the document to the need to ensure that any necessary water and wastewater infrastructure upgrades are required ahead of the occupation of development. In the absence of a suitable policy supporting water and wastewater infrastructure requirements within the Core Strategy we would highlight the need for such a policy within the forthcoming Development Policies DPD. | as above | as above | 7.5 Environmental Sustainability |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A008.5 | Thames Water Utilities Ltd | It is suggested that the following wording is included within the Alperton Masterplan SPD: <br> "All new development must fully consider water and wastewater infrastructure capacity both on and off site in order to avoid any potential problems for existing or new users. Developers will be required to demonstrate that adequate capacity exists and in some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water and sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the statutory undertaker, then the developer needs to contact the statutory undertaker to agree what improvements are required, how they will be funded and when they will be provided. Any upgrades required will need to be delivered prior to the occupation of development." | Environmental Sustainability | Proposed wording is considered to be overly detailed for the purposes of the SPD and is more suitable for Development Management policies DPD. Reference to potential impact of development on water and waste water infrastructure will be added to section 7.5 Environmental Sustainability. | No update required |
|  | Thames Water Utilities Ltd | In addition it is proposed that a policy in relation to water and wastewater infrastructure should be provided in the forthcoming Development Policies DPD following the suggested wording below: <br> "PROPOSED POLICY - WATER AND SEWERAGE INFRASTRUCTURE CAPACITY: <br> Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where: <br> 1. sufficient capacity already exists or <br> 2. extra capacity can be provided in time to serve the development which will ensure that the environment and the amenities of local residents are not adversely affected. <br> When there is a capacity problem and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the developer funds appropriate improvements which will be completed prior to occupation of the development." | Environmental Sustainability | Recommendations will be considered when Development Management Policies DPD is progressed. | No update required |
| A009.0 | Ms S Di Genova | I'm really not happy about the proposed new plans for Alperton and, quite sincerely, the idea of having to live with 10 years of upheaval puts me into a deep depression. <br> No! to the proposals on the following grounds: <br> - No to urbanization <br> - No to the increased congestion, both human and vehicular <br> - No to the long term major building work and disruption to local residents <br> - No on the grounds of loss of privacy <br> - No to the detrimental effects on the welfare of local residents <br> - No to the detrimental effects on the welfare of local wildlife | Unsupportive comment | Unsupportive comment noted | No change proposed |
| A009.01 | Ms S Di Genova | I have lived in Alperton nearly all my life. It used to be an idyllic place to live. All the houses had hedges; all the houses along Carlyon Road had luscious tall trees behind them (no doubt they became difficult to manage for people and so have been slowly removed over the years); there were very few cars on our streets; and the playing field at the bottom of the road was a 'field' and not what has practically now become a wooded area - thanks to the well meaning but totally inappropriate decision to plant even more trees there by 'Trees for Cities', Brent Council and the Mayor of London. | Public Realm | Response: Public realm improvements are a central part of the proposals for Alperton, in order to create a legible and identifiable place which is pleasant and safe to walk around. The masterplan is to be read in conjunction with The Brent Placemaking Guide which sets out public realm policy and design guidelines. Contributions to the management and maintenance of open spaces will be required as part of any development proposal. Section 7.2 has been updated to reinforce the requirement to refer back to the Placemaking Guide and Section 11.1 has been update to show a commitment to working with partners and the community to improve public realm design and management and maintenance. | 7.2 - Destinations and Places 11.1 - Working with partners |

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| A009.02 | Ms S Di Genova | The proposal's that are being made are hideous. The Council want to drag current residents even further into an urban landscape when what we actually want is more open spaces. There are far too many of us in a very small area already! The congestion is no joke. | Housing/ density | Response: The decision to support growth in Alperton was already set out in the Core Strategy as one of the Boroughs Growth Areas. The Core Strategy (CP2) sets out the borough's plan for a sustainable population growth of 28,000 people by 2017 and the provision of at least 22,000 additional homes between 2007 and 2026. Over $85 \%$ of these new homes will be delivered in five growth areas, one of which is Alperton, where mixed use regeneration is identified as having the capacity to delivery a minimum of 1,600 new homes. The masterplan has tested the acceptability of this target, which is also informed by the LDF Site Specific Allocations. No changes are proposed to the masterplan. | No change proposed |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A009.03 | Ms S Di Genova | Previous Indiscretions <br> When I think of the development that has gone on so far it beggars belief that the local planning office agreed to the building of such tall blocks (very recently) that now, already, have taken away my privacy and obstruct my view, and which are totally random and uncoordinated in style. Is this a taste of what we are to see in further new development? The buildings are monstrosities which never should have been allowed to be built, let alone to such a height. Did the Council think we would not realise this has been done in order to set a precedent, which would then allow future buildings of this height to be built? | Housing/ density | Response: The masterplan actually restricts taller, higher density housing to one area at the junction of Ealing Road and the canal near to Alperton Station. This area is considered suitable for higher density housing as it has good public transport links and is well served by a range of local services and amenities. Further, this area is characterised by taller buildings, such as Middlesex House, the recently completed development on Atlip Road, and the permitted proposal for the $B \& Q$ site, and therefore this form of development is considered to be in keeping with the existing built environment. No changes to the masterplan are proposed. | No changes proposed |
| $\begin{array}{\|l} \text { A009.04 } \\ \hline 0 \\ \hline 0 \\ 0 \\ \hline 0 \end{array}$ | Ms S Di Genova | I have seen evidence of the Council's lack of indiscretion before. Did a buildings inspector ever visit the site of the now Bluebell nursery on Carlyon Road? Again, although no doubt much needed, the building is out of character and too tall in comparison to neighbouring houses. It was built by a team of amateurs, and if not amateurs, then a team of builders that flouted every health and safety regulation there is. I personally witnessed outright dangerous behaviour on site during building work. Now the building looks somewhat ramshackle. | as above | as above |  |
| $\begin{aligned} & \begin{array}{l} \mathrm{ADOO9.05} \\ \omega \\ \omega \end{array} \\ & \Omega \end{aligned}$ | Ms S Di Genova | Who agreed to the placing of railings along the front of the row of shops in Carlyon Road. Not only is the path obstructed and individuals have to weave their way around them, they are unsightly and also dangerous. The railings were never secured properly. They have been loose and bent since they were installed. I saw one lifted out of the ground, it was so loose, and placed by the wall of the nursery - is this the best the Council could do to stop cars parking up on the pavement? We already had a few concrete posts, which at very least are more aesthetically pleasing, if absolutely necessary could not a few more of these have been used instead? We have four different types of post/ railing in front of these shops. | Public Realm | Response: Public realm improvements are a central part of the proposals for Alperton, in order to create a legible and identifiable place which is pleasant and safe to walk around. The masterplan is to be read in conjunction with The Brent Placemaking Guide which sets out public realm policy and design guidelines. Contributions to the management and maintenance of open spaces will be required as part of any development proposal. Section 7.2 has been updated to reinforce the requirement to refer back to the Placemaking Guide and Section 11.1 has been update to show a commitment to working with partners and the community to improve public realm design and management and maintenance. | 7.2 - Destinations and Places <br> 11.1- Working with partners |
| A009.06 | Ms S Di Genova | How has a mattress recycling plant been allowed to operate right next to people's homes on Carlyon Road? The unsavoury smell alone should mean that it should not be within a certain distance of a residential area. |  | Masterplan document suggests that development should result in better adjacences between residential and commercial uses, including existing dwellings. | No changes proposed. |
| A009.07 | Ms S Di Genova | Objection <br> I would disagree with anybody who says the canal side area is under appreciated, and I think that the heavy, long term development that is being proposed will be detrimental to the welfare of those who already live and work in the area. It will also be detrimental to the wild life which is only just returning. I very much doubt the Council has its resident's best interest at heart. | Waterside development | The council fully understands that there are many existing residents that use and appreciate the canal. However, we believe that the potential of this valuable asset is not fully realised. The document proposes significant improvements to the social and physical infrastructure including new open spaces and community facilities that should provide significant benefits to those already live and work in the area. In relation to the impact of development on local wildlife, there will be a significant number of new trees as well as new open spaces and developments with green and brown roofs, therefore the council considers that there will be major benefits to wildlife and biodiversity in the long term. | No changes proposed. |

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| A009.08 | Ms S Di Genova | If anything, I wonder if this is being considered as a money making venture. It's interesting to hear that the Council has 'changed planning policy so that residential developments can now be built on this land'. It also appears that the Council will be paying off those who already are situated in these areas (in one way or another) and allowing those who will generate more money for the Council in. |  | The council is required to plan for housing growth in the medium to long term by regional planning policy. Its strategy for identifying growth areas is contained within the adopted Local Development Framework Core Strategy. The justification for idenitifying growth areas, including Alperton is set out within the document. Areas that have good public transport, a supply of land and could benefit from improvements to the townscape or are showing signs of physical decay. Equally, the planned concentration of housing growth (through tools such as a masterplan) can fully understand the requirements of social and phycial infrastructure and ensure that a critical mass arises for their delivery at the right time in the right place. The Council does not own land in Alperton and will not stand to profit from development. | No change proposed |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A009.09 | Ms S Di Genova | Recommendation - Preferable Future <br> By all means improve the quality of the infrastructure, it has been long overdue. Low level housing would be in keeping with the principle character of the area. Improve existing areas, don't just build new homes and let the old ones go to rot. (For example, Wembley high street is still a disgrace following redevelopment in that area.) Be mindful that people like me do not want to live in urban areas, that is why we live on the outskirts of London. | Housing/ density | Response: The masterplan sets out the vision of how regeneration can transform Alperton into three distinct character areas and describes each of these areas in terms of overall feel and character, land use, building height, street hierarchy, public realm, open space improvements and housing density, types and tenure. Moreover, building upon the LDF position on the need for development to be sustainable and supported by adequate social and physical infrastructure, the masterplan details a series of interventions and projects that will support the growth in the number of people living and working in Alperton. | No change proposed |
|  | Ms S Di Genova | Lastly, for goodness sake and at very least, if the Council send representatives to local areas to discuss the proposals then please send those who know the local area! The Council should also be much more open and do a better job of advertising such events. <br> The Council is proposing a nightmare for local residents. I am not happy with the Council's proposals. |  | No response required |  |
| $05^{10.0}$ | Iver Consulting/ Aprirose | I write to you acting on behalf of Aprirose, managing agents for the landlord of the above property, Aprirose (Didsbury) LLP. <br> From appraising the above document my clients are concerned that such a key site has not been allocated within the master plan for residential led redevelopment. This view we outlined at a meeting with officers from your Planning department on the 17th November 2010. <br> This site, which comprises of circa 1.65 acres, is located adjacent to the basin of the canal and is currently leased to the builder's merchants, Jewson's. We feel it should be allocated for development for the following reasons; <br> - Its current use does not fully maximise the sites development potential. <br> - Sites exist within the nearby area which would enable Jewson's to be relocated within the Borough <br> - It is located in a highly sustainable location, being close to public transport links, schools and shops. • It offers a logical edge to the proposed area for re-development, offering clear defensible boundaries provided by road and canal, rather than the one currently proposed which uses an arbitrary line defined by land ownership rather than physical features. | CA1 | This site is not within growth area as set out in core strategy therefore cannot be fully included in this but an indicative development option can be shown. Additionally, the council could, in partnership with the landowner prepare a planning brief for the site. Section 8.0 has been updated with a general description to include this option/ future development | 8.0 Alpertons Core |

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| A010. 1 | Iver Consulting/ Aprirose | It would also provide the opportunity, whilst capable of being developed separately, to form part of a larger scale development with adjoining commercial sites should they become available. <br> Should the site be allocated for development my clients would be keen to work with the Council to bring forward a scheme which would provide the following; <br> - Flatted units located adjacent to the Canal taking advantage of the water aspect <br> - Houses being proposed adjacent to Manor Farm Road, thereby respecting the surrounding area <br> - The provision of an element of affordable housing, at a level and tenure mix which would still make the scheme financially viable to be brought forward for development <br> - Providing an area of public open space adjacent to the canal side, thereby enhancing public access <br> - If required an element of managed work space could be provided to off-set any concerns over the loss of employment land <br> We trust the Council will take on board the above and allocate the site for housing development, thereby enabling it to contribute towards the overall objective of the Alperton master plan of making Alperton into a place where people want to live, work and invest. <br> Should you wish to discuss the above myself and Aprirose would welcome the opportunity of further meetings with the Council to bring forward our re-development plans, working in partnership with the Council. | as above | as above |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A011.0 | Abbey Waterside Development Ltd | In general terms, AWDL welcomes the Masterplan approach and supports the overall aim of providing a catalyst for investment and regeneration through residential led comprehensive redevelopment in the area. | Supportive comment | Supportive comment noted | No change proposed |
| A011.01 <br> 0 <br> 0 <br> 0 <br> 0 <br> $\omega$ <br> 1 | Abbey Waterside Development Ltd | 2.2 AWDL has a number of objections to elements of the Masterplan. These can be summarised as; <br> - Unrealistic 50\% Affordable Housing Target | Viability/ delivery | Response: On the basis of availability of information, the council has a broad understanding of costs and values in the masterplan area and these are not perceived to be prohibitive. The 2009 Affordable Housing Viability Study concludes that although circumstances vary from site to site, it is appropriate for the council to maintain the $50 \%$ borough wide target and this is included within the Adopted LDF Core Strategy (2011). Development proposals that come forward will be tested for viability through the planning process having regard for a number of factors, including the deliver of affordable housing. In any case, it is not possible for the masterplan to introduce a policy that differs from the Core Strategy. | 11.0 Delivery |
| A011.10 | Abbey Waterside Development Ltd | - Questioning the sense of creating several new small parks when the existing local parks suffer from neglect - | Physical and social infrastructure | Response: Section 7.3 - describes the councils approach to meeting open space requirements in Alperton, which includes improving existing open space and proposing locations of new open spaces which can be delivered through development. It has been noted that this section should provide more detail on how open spaces can be improved with a clear reference back to CP8 -Protection and enhancement of Open Space and the requirements of the Infrastructure Investment Framework. | 7.3 Destinations and places |
| A011.06 | Abbey Waterside Development Ltd | - Over-reliance on a generic and out of date viability study - need for detailed site-specific viability appraisals. <br> - Over-emphasis on family housing, although we welcome this as part of a balanced mix -there must be more openness towards flatted residential units <br> - We object to the limiting statements on the height and type of buildings proposed for the Waterside Neighbourhood (page 42): <br> - Building heights mainly three stories to respect existing context. <br> - Homes largely consisting of maisonettes and town houses with doors on the street | Housing/ density | Response: As suggested within the document, the proposed masterplan is one interpretation of how development could come forward in Alperton, around suggested principles of streets and connections, adjacencies, use, character and housing mix. Suggested building heights are included to further explain the suggested interpretation and show consideration of the impact on adjacent and existing dwellings. Section 4.0 has been updated to make this intention clearer. | 11.0 Delivery |

[^3]| A011.07 | Abbey Waterside Development Ltd | The effect of limiting height to 'mainly three storeys' in this area, will be that the vision of a transformed Alperton will not be realised. We note that the images illustrate taller buildings, but the SPD cannot adopt such self limiting objectives in respect of height within its text. It will be immensely damaging to future delivery of the overall vision. | Housing/ density | Response: The council has carried out a significant amount of testing of the layouts that are illustrated in the masterplan. Proposals within the central character area aim to show how the compact and tight-knit character described in the vision can be achieved whilst being sympathetic with the surrounding building heights and maintaining the spirit of existing planning requirements. The masterplan is intended to be clear about the scale of development that the council and local community expect whilst at the same time being flexible. In response to these comments Section 4.0 and Section 9.0 has been updated to reflect some of the comments received from developer/ landowners for example it has been made clear that maps and diagrams are for illustrative purposes only and that future applications will not be held up against them to get an exact match. | 4.0 Achieving the vision 9.0 Waterside neighbourhood |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A011.08 | Abbey Waterside Development Ltd | There is no justification or architectural rationale for considering that buildings should be of "mainly three stories" when large areas of this zone are fully capable of sustaining buildings of greater height. | as above | as above |  |
| A011.09 | Abbey Waterside Development Ltd | - Objection to opening up a continuous route along the northern canal bank: conflicts with the historic pattern of canal development and risks diluting activity on the two path and perpetuating the sense of insecurity using it today. | Waterside development | Although there are a number of locations where public access will be possible, a continuous route along the northern side of the canal has not been proposed within this document. | No change necessary |
| A012.0 <br>  <br> 0 <br> 0 <br> 0 <br> D | Octavia Housing | Octavia Housing have worked alongside Brent Council on the masterplanning of Alperton and welcome development proposals. We are very supportive of the regeneration proposed to Alperton. <br> We are particular pleased to see the much needed face lift, canal side living will generate social activity and create a desirable place to live and work. | Supportive comment | Supportive comment noted | No change proposed |
| $\begin{aligned} & \omega \\ & \omega \\ & \infty \end{aligned}$ | Octavia Housing | We would comment specifically as follows; <br> Alperton's Core - The need for residential with high quality commercial space is particularly welcome, if successfully implemented this will help to stimulate economic growth and provide opportunities for both business and the local community whilst making Alperton a desirable place to live and work. | as above | Accepted. Section 8.0 updated | 8.0 Alperton's Core |
| A012.2 | Octavia Housing | Waterside residential neighbourhood - The proposals for medium to low rise development are welcome and will compliment the existing community. As a landlord we are always keen to see an integration between existing communities and new communities entering a community. The avoidance of high rise homes will minimise the impact on existing residential streets. | as above | as above | No change proposed |
| A012.3 | Octavia Housing | Industrial transitional zone - We would like to see some flexibility here with the possible introduction of residential as this is a large area which needs to be able to accommodate changes in the economy and meet increasing demand for housing. | Housing/ density | Response: The council believes that the site presents a major opportunity not only to provide additional homes but also contribute to the delivery of the essential social and physical infrastructure that Alperton needs including potentially a new open space and is disappointed that the GLA are not flexible enough to consider some enabling development to see this site come forward. Due to the specific concerns raised by the GLA however the council accepts reluctantly that any review of the site allocation will need to be completed through a Development Plan Document and so has withdrawn any reference to any alternative development option for this area. Section 10.3 has been withdrawn. | 10.3- Opportunity to introduce residential development |

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| A012.4 | Octavia Housing | General - the Local Authority, developers and housing providers need to be mindful of security and access to amenities particular for existing residents on roads that run off the Ealing Road, leading to or forming part of the Abbey Estate. The canal links have raised concern amongst residents who fear these could be used as escape routes for criminal activities and there is a perception existing communities may not be able to easily access new amenities arising out of proposals. | ASB | Response: While the masterplan cannot deal with every individual or particular problems related to ASB, it does provide support to ensure that in planning dwellings and neighbourhoods attention is given to planning out crime by adopting important design principles such as ensuring overlooking of spaces, providing good lines of sight and so-on. An amendment is proposed in section 4.0 to underline this important issue. It it is recognised that the council will need to work closely with other teams including SNT, parks and streetcare as the area is developed to tackle such issuesand section 11.1 has been updated to show this. | 4.0 Achieving the vision 11.1 Working with partners |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A012.5 |  | The proposals will general a high volume of housing and the mix of housing tenure will need to be carefully considered to ensure a balanced community and the encouragement of economic growth. | Housing/ density | Response: The masterplan sets out the vision of how regeneration can transform Alperton into three distinct character areas and describes each of these areas in terms of overall feel and character, land use, building height, street hierarchy, public realm, open space improvements and housing density, types and tenure. Moreover, building upon the LDF position on the need for development to be sustainable and supported by adequate social and physical infrastructure, the masterplan details a series of interventions and projects that will support the growth in the number of people living and working in Alperton. | No change proposed |
| A012.6 | Octavia Housing | Once again we would reiterate our support of the regeneration of Alperton. | as above | as above |  |
|  | Network Housing | ALPERTON MASTERPLAN - SUPPLEMENTARY PLANNING DOCUMENT NETWORK HOUSING REPRESENTATIONS <br> Thank you for the opportunity to comment upon the draft masterplan. As you know Network have been involved in this exercise and also have a large stock presence in the area. Network Housing Group is pleased to provide comments on the document and welcome the Council's initiative to prepare a framework for encouraging the regeneration of Alperton. <br> This letter provides a short response on the main policy change and the three sub-areas of the masterplan. |  | No response required |  |
| A013.1 | Network Housing | Release of Industrial Land for Other Uses <br> The master plan makes note of the amount of vacant and derelict industrial premises in Alperton. Network Housing Group agrees that this land is "ripe for development", and the removal of employment designations in key locations is therefore strongly supported. <br> The rationalisation of employment space would bring vacant and under-utilised land back into active use. The removal of restrictive policies will help encourage development now that higher value land uses (such as residential) will be permitted. | Supportive comment | Supportive comment noted | No change proposed |
| A013.2 | Network Housing | Alperton's Core <br> The proposal for a new public space at Alperton station is welcomed we feel this will enhance the area. This will create a sense of arrival for public transport users, and improve the current cluttered street scene. Similarly the open space shown in front of the Council's development on Ealing Road is also supported. This will improve the setting of the taller buildings around this junction. | as above | as above | No change proposed |
| A013.3 | Network Housing | Reference to a new lighting scheme on Ealing Road Bridge is supported. This will improve legibility and safety at night for residents at Middlesex House and Grand Union Heights, as well as potential residents at the former B\&Q site opposite. | as above | as above | No change proposed |
| A013.4 | Network Housing | The suggested housing mix for this area is correctly balanced towards smaller households given the Council's aspiration of creating a high density busy urban area. However, the statement in section 8.1 that "Development in Alperton's core will be more conventional in terms of current planning policy" is rather ambiguous, given the higher densities and smaller household sizes sought. | CA1 | Accepted, this section has been rewritten and this comment deleted | 8.1 Regeneration Principles |

Prepared by beth.kay 27/06/2011
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| A013.5 | Network Housing | Waterside Community The transition between the high density developments of Alperton's Core and the low rise warehouses of the Northfields Industrial estate present a number of land use challenges. Network Housing Group is supportive of Brent's ambitions to "open up" the canal side to new residential development, this would enhance the area and make any sales housing more marketable. The document states that new development should be mainly 3 stories in height. Such a building height would be in keeping with the scale of housing south of the river (Carlyon Road), but it is good to note that in cases of high quality design other standards (such as physical separation distances) may be relaxed to deliver appropriate development and ensure viability. | Housing/ density | Response: The council has carried out a significant amount of testing of the layouts that are illustrated in the masterplan. Proposals within the central character area aim to show how the compact and tight-knit character described in the vision can be achieved whilst being sympathetic with the surrounding building heights and maintaining the spirit of existing planning requirements. The masterplan is intended to be clear about the scale of development that the council and local community expect whilst at the same time being flexible. In response to these comments Section 4.0 and Section 9.0 has been updated to reflect some of the comments received from developer/ landowners for example it has been made clear that maps and diagrams are for illustrative purposes only and that future applications will not be held up against them to get an exact match. | $\begin{aligned} & \text { 4.0 Achieving the vision } \\ & \text { 9.0 Waterside neighbourhood } \end{aligned}$ |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A013.6 | Network Housing | Northfields Working Suburb <br> As mentioned earlier in the letter, the Council plans to remove restrictive employment designations from significant areas around Alperton. Network Housing Group believe that Brent have struck the correct balance between releasing land and consolidating employment uses at Northfields Industrial Estate as a strategic industrial location. This ensures that if businesses do relocate as a result of the changes, there is a recognised area for such activities. Demand will therefore be concentrated into the correct places; meanwhile less appropriate areas can now come forward for development. This will help consolidate industrial uses whilst at the same relieving other residential areas from the impact of "bad neighbour" activities. | Housing/ density | Response: The council believes that the site presents a major opportunity not only to provide additional homes but also contribute to the delivery of the essential social and physical infrastructure that Alperton needs including potentially a new open space and is disappointed that the GLA are not flexible enough to consider some enabling development to see this site come forward. Due to the specific concerns raised by the GLA however the council accepts reluctantly that any review of the site allocation will need to be completed through a Development Plan Document and so has withdrawn any reference to any alternative development option for this area. Section 10.3 has been withdrawn. | 10.3-Opportunity to introduce residential development |
| 0 |  |  |  |  |  |
|  | Network Housing | Notwithstanding this, the flexible approach to canal-side activities at Northfields is positive and will allow the authority to positively respond to developments which would enhance the industrial estate; even if the uses do not necessarily fall within the $\mathrm{B} 1, \mathrm{~B} 2$ or B 8 classifications for employment. | as above | as above | No change proposed |
| ${ }^{13.8}$ | Network Housing | General Comments - Housing Mix <br> The housing types and tenures stated for each of the three development areas provide helpful guidance. Smaller households are correctly directed towards the Core, whilst the Waterside Community is considered a more appropriate location for family housing. Nonetheless, for reasons of viability, it is important that these stated mixes are flexibly applied, and not too prescriptive. The reference to "suggested" mix is welcomed, and should remain to allow developers the ability to deviate from the tables specified in the document. | as above | as above | No change proposed |
| A013.9 | Network Housing | Summary <br> The release of under-utilised industrial sites to alternative uses will stimulate development. Furthermore, the package of supporting measures such as new public spaces and improved lighting will enhance the public realm. The masterplan is clear and considered, and Network Housing Group strongly the draft master plan <br> I am happy to discuss further with you or your team. | Public Realm | Response: Public realm improvements are a central part of the proposals for Alperton, in order to create a legible and identifiable place which is pleasant and safe to walk around. The masterplan is to be read in conjunction with The Brent Placemaking Guide which sets out public realm policy and design guidelines. Contributions to the management and maintenance of open spaces will be required as part of any development proposal. Section 7.2 has been updated to reinforce the requirement to refer back to the Placemaking Guide and Section 11.1 has been update to show a commitment to working with partners and the community to improve public realm design and management and maintenance. | 7.2 - Destinations and Places <br> 11.1 - Working with partners |

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| A014.0 | English Heritage | Thank you for consulting English Heritage on the London Borough of Brent's proposed Alperton Masterplan Supplementary Planning Document (SPD). <br> In 2010, the Government published Planning Policy Statement 5: Planning for the Historic Environment which sets out national planning policies on the conservation of the historic environment. The development plan making policies in this PPS (see HE2, HE3, HE4 and HE5) must be taken into account by local planning authorities in the preparation of local development documents. Local planning authorities should ensure, 1) plans are supported by a robust evidence base, 2) there is a 'positive, proactive strategy for the conservation and enjoyment of the historic environment' and 3) the impact of policies on heritage assets are monitored. |  | No response required |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A014.1 | English Heritage | As the Government's statutory advisor on the historic environment we have reviewed your consultation in light of PPS5, alongside other key national and regional planning policy, and wish to make two points concerning the SPD as follows: <br> - That it include the need for development to consider the setting of the London Borough of Ealing's Canalside Conservation Area which is adjacent to the proposed Masterplan area; and <br> - That it give some consideration as to whether there any existing elements in the masterplan area that might warrant local designation as heritage assets. | Conservation | Response: The Council will expect the usual detailed analysis of the impact of development on adjacent registered heritage assets, as part of any definite development proposal. The impact on views in and out of the Conservation Area will require testing and Brent Council will require the test as a part of any Design and Access statement. | No change proposed |
| A014.2 | English Heritage | English Heritage would strongly advise that the local authority's conservation staff are involved throughout the preparation and implementation of the SPD as they are often best placed to advise on; local historic environment issues and priorities; sources of data; and, consideration of options relating to the historic environment. | Conservation | The Council's Urban Designer contributed to the development of the SPD and has experience of heritage analysis and protection - he will continie to be closely involved in the delivery of the Masterplan | No update required |
|  | English Heritage | Finally, it must be noted that this advice is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the SPD, and which may have adverse effects on the historic environment. |  | No response required |  |
| 1915.0 | Environment Agency | Restoration of the River Brent <br> The Thames Catchment Flood Management Plan (CFMP) Brent Policy Unit has identified that there are massive opportunities to reduce flood risk through redevelopment for the Brent catchment. Long term adaptation actions have been recommended and include the re-creation of river corridors so that there is space for the river to flow more naturally and space for the floodplain where water can be attenuated. <br> Policy 4A. 13 'Flood Risk Management' of the Mayor's London Plan also encourages the setting back of permanent built development and taking opportunities to identify and utilise areas for flood risk management, including the creation of new floodplain or the restoration of all or part of the natural floodplain to its original function, as well as using open space in the flood plain for the attenuation of flood water. <br> CP18 of the borough's Core Strategy has also stated that open space (including waterways) of local value will be protected from inappropriate development and will be preserved and Objective 9 to 'protect and enhance Brent's environment by enhancing the boroughs green and blue infrastructure by returning rivers to their more natural courses' and 'creating new and enhanced open spaces'. | Waterside development | Response: Section 7.3 states that a series of new green spaces will be created as well as proposing improvements to existing open spaces which are detailed in the character area chapters. It is recognised that the masterplan could usefully provide more guidance on how the canal should be protected and enhanced. Relevant biodiversity and canal-side protection and enhancement measures that will be sought from development proposals will be added to section 7.5. | 7.5 Environmental Sustainability |
| A015.0 | Environment Agency | Alperton Masterplan Supplementary Planning Document - Public Consultation. Thank you for your consultation on the Alperton Masterplan Supplementary Planning Document. We hope you will find the following comments helpful. <br> We can see the benefits the proposed transformation will bring to the Alperton area over the next ten years, however, were concerned that some major considerations have not been addressed in this document. These are addresses under the headings below. |  | No response required |  |
| A015.01 | Environment Agency | In addition to the above, we require an 8 metre buffer zone along the River Brent to be maintained, free from permanent structures. This is to maintain access to the watercourse for routine and emergency maintenance works and to ensure the structural integrity of the river bank is not adversely affected. In addition the buffer zone has biodiversity and increased water quality benefits. | Waterside development | The requirement for an 8 m buffer along the Brent river is noted | Section 10 - Northfields |

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| A015.10 | Environment Agency | We were pleased to see that Residential Development must achieve Code for Sustainable Homes Level 4 on page 10 and Page 29. Achieving a water efficiency standard of $1051 / \mathrm{h} / \mathrm{d}$ within new homes can be accomplished at very little extra cost (under $£ 125$ extra per home) and typically only involves low/dual flush toilets, low flow/aerated taps and showerheads and efficient appliances (dishwasher and washing machines) and does not require more expensive rain or greywater technologies. | Supportive comment | Supportive comment noted | No change proposed |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A015.11 | Environment Agency | Contaminated Land \& Waste Section 5.0 Change of use: supporting growth states that some locations have been subject to industrial usage and land which is ripe for development. We feel it is important here to make reference to Planning Policy Statement 23 Planning and Pollution Control as investigative reports into the nature of possible contamination and then remediation plans if contamination is identified will need to be made before these areas are developed. <br> Reference should be made to the fact that a waste management strategy in terms of waste reuse and treatment for site which have been displaced and pollution prevention measures must be made available. | Environmental Sustainability | Reference to potential impact of development on water and waste water infrastructure and need to demonstrate adequate capacity will be added to section 7.5. | 7.5 Environmental Sustainability |
| A015.12 | Environment Agency | This document should recognise the importance of providing the timely provision of services and infrastructure to meet development aspirations, in particular investigation should be carried out to ensure there are appropriate levels of capacity in the foul sewer network in the area to cope with the additional burden caused by this redevelopment. We would not want to see an application for a large sewage discharge into the canal as this would compromise the current ecological status. | as above | as above | 7.5 Environmental Sustainability |
| A015.13 <br> 0 <br> 0 <br> 0 <br> 0 <br> 0 | Environment Agency | We recommend the following aims be added to the Alperton Masterplan: <br> - We will work with the water and sewerage providers to ensure that appropriate capacity is available to serve new development. <br> - We will phase development in line with the available infrastructure capacity and work with these providers where new infrastructure is required. <br> We hope you take our comments on board, I will be happy to meet up with you again to discuss anything further. Yours sincerely | as above | as above | 7.5 Environmental Sustainability |
| A05.02 | Environment Agency | This Masterplan should bring all of these policies and recommendations forward and make a commitment to: <br> - set all new development back a minimum of 8 metres from the River Brent <br> - a commitment to naturalising, enhancing and restoring the river Brent corridor or parts of the Brent river corridor. <br> - a commitment to restoring natural floodplain and the provision of fluvial flood attenuation either in a designated flood alleviation scheme of attenuation of flood waters on new open space | Waterside development | as above | Section 10 - Northfields |
| A015.03 | Environment Agency | As Tokynton Park where 1 km of the River was restored is upstream of the Northfields area it would be a good opportunity to do some similar restoration works. We are aware that a second phase of restoration involving another 1 km is planned when funding can be found. <br> The River Brent is at its most heavily modified state in the Alperton part of Brent, as it is a concrete bed and banks, with surface run off quick due to the heavily urbanised environment. Currently there is no in-channel or marginal vegetation to speak of and the sediments and gravel and rubbish in channel are shunted downstream with each pulse of high flow. The area is also heavily contaminated with Japanese Knotweed (which has the potential to cause some structural damage to the concrete flood defences and other structures) and some Himalayan Balsam and Giant Hogweed. | Waterside development | The aspiration to naturalise this element of the Brent river is fully acknowledged and supported by the council, however any restoration work would be contingent upon securing the necessary funding. | No change proposed |
| A015.04 | Environment Agency | There is mention of s106 money and a canal fund on pages 36 and 61 . We propose a project for a river restoration fund could also be included and section 106 money could go towards: <br> - Treatment of Japanese Knotweed along the Alperton/Brent section of the River Brent Corridor <br> - Implementation of Phase 2 of the Tokynton Park River Restoration project. [⿴囗 | Waterside development | The idea of a canal fund has been put forward due to the strategic importance of the canal in relation to the regeneration of Alperton. Although the restoration of the river Brent is supported, it is not a strategic priority. The council wishes to focus the limited funds available on achieving this strategic priority and will relate improvements to the river directly to development within close proximity. | No change proposed |

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| A015.05 | Environment Agency | These would break the Brent out of its concrete and help adaptation to climate change and would help meet the Water Framework Directive agenda. <br> The boroughs Level 1 Strategic Flood Risk Assessment (SFRA) has put forward a Development Control Recommendation for 'a minimum 8 metre buffer zone to be provided to 'top of bank' within sites immediately adjoining a main river corridor (River Brent) and a 5 metre minimum buffer zone to be provided adjacent to ordinary watercourses (Grand Union Canal). We recommend the Alperton Masterplan should also show commitment to setting back development. <br> Set back from the Grand Union Canal We can see the benefits of developing alongside the canal area in order to make it more accessible to residents and this waterside location has great potential. We were concerned with one of the Regeneration Principles in Section 8.1 Page 33 <br> that 'Canal side buildings will exploit the proximity to the water benefiting from the increased sales vale of buildings next to open water.' | as above | as above |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A015.055 |  | We would request a 5 metre minimum buffer zone to be provided adjacent to ordinary watercourses such as the Grand Union Canal. The canal does offer an important wildlife corridor through London and the upkeep of natural habitat is important. Where the 5 metre set back is not possible, we would look for compensation in terms of the installation of floating reed beds and artificial spawning mats for fish as that artificial light is kept to minimum lux levels and focused away from the water together with no shading of the watercourse through close proximity and height of new buildings particularly to the south side. | Waterside development | The Grand Union Canal is a man made watercourse accommodating canal based traffic. The provision of set backs and reedbeds does not sit well with its character nor its functional requirements. However the SPD encourages the enhancement of nature features that improve or enhance the biodiversity. | No change proposed |
| A015.06 <br> 0 <br> 0 <br> 0 <br> D <br> D | Environment Agency | We recommend the following regeneration principle be added: <br> Canal side buildings will be built with consideration of the canal as an important wildlife corridor, seeking a 5 metre set back and where not possible providing ecological enhancements along the canal. <br> Currently the Grand Union Canal has been reviewed under the Water Framework Directive as having a Good Ecological Potential. This is the best status it can be as a Heavily Modified Waterbody. Therefore we would be reluctant to allow any physical or structural changes if it is thought that they could go against the No Deterioration policy. All new housing in the area should ensure that the drainage is connected correctly to prevent any deterioration to surface water quality. Industrial sites should also be connected to drainage correctly. | Environmental Sustainability | Response: Section 7.5 has been updated to include more guidance on sustainable development including relevant biodiversity and canal-side protection and enhancement measures which will be sought from development proposals and an additional section 7.6 has been added on Environmental Protection. | 7.5 Environmental Sustainability 7.6 Environmental Protection |
| A015.07 | Environment Agency | Development with regard to Flood Risk <br> As this document had been developed to inform and influence developers and guide proposals (as stated on Page 9 Chapter 4.0) we think that the findings and Development Control Recommendations within the borough's SFRA should be integrated into the site requirements. As the document is intended to guide proposals then reference should be made that developments should reduce surface water run-off rates to green field run off rates. The reduction of site runoff rates to Greenfield run off rates is also supported by Policy 4A. 14 Sustainable Drainage of the Mayor's London Plan. <br> We are concerned that the Alperton Materplan has not demonstrated how surface water flooding will be managed and reduced. The majority of the Alperton area lies within Flood Zone 1 but the boroughs SFRA has identified this area as relatively susceptible to 'flash flooding' due to the intense urban development and natural clay geology. It has also highlighted that surface water flooding should be expected during intense rainfall and with a changing climate, it is expected that intense storms of this nature will become increasingly common. The SFRA recognises that the application of Sustainable Drainage Systems (SuDS) as part of all future development will assist in reducing the risk of flooding to the borough and the following recommendation should be added to Section 4.0 Achieving the Vision Section on Page 9-10: | as above | as above |  |

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| A015.08 | Environment Agency | Implement SuDS to ensure that runoff from the site (post redevelopment) does not exceed Greenfield runoff rates. By reducing the rates and volumes of surface water leaving sites in the Alperton Masterplan area this will be supporting Core Policy 19 by contributing towards <br> achieving sustainable development including climate change mitigation and adaptation. <br> The above recommendation could also fit in section 7.5 Environmental Sustainability of the Alperton Masterplan under a separate Flood Risk Section. <br> Under this same section we would recommend that reference be made to maximising the use of SuDS including green roofs using the SuDS hierarchy (our <br> "Practical Guide to SuDS" including the hierarchy is attached). Green roofs are the most sustainable option at the top of the hierarchy but a full range of SuDS can be used to manage surface water and achieve greenfield run off rates. <br> Policy 4A. 11 Living Roofs of the Mayor's London Plan encourages the use of green roofs. <br> By maximising the use of SuDS using the hierarchy, and committing to the use of green roofs the Alperton Masterplan will be supporting a number of core policies. <br> - CP5 by incorporating green infrastructure at different levels <br> - CP8 by improving the quality of open spaces <br> - CP18 as this will guide developers to improve open space and the built environment for biodiversity and nature conservation | Environmental Sustainability | Section 7.5 has been updated to incorporate these recommendations | 7.5 Environmental Protection |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | Environment Agency | We recommend that the Alperton Masterplan is updated to commit to and include the following: <br> - Green roofs will be maximised wherever practical and feasible within the Alperton area in line with Policy 4A. 11 of the London Plan. <br> - All new paved areas will be permeable paving. <br> - Surface water will be restricted to Greenfield run-off rates (post development) through the use of SuDS. <br> This would meet the boroughs objective on Page 11 of 'Working with developers to achieve the best and most sustainable solution for each site'. | as above | as above |  |
|  | Ajay Nehra | With respect to your proposed plans for Site Specific Allocations (DPD) with respect to the 1.6 hectares Off Mount Pleasant Road, Alperton, HAO; we would like to withdraw our property, known as Continental House, 497 Sunleigh Road, Alperton, Middlesex, HAO 4LY (or HAO 4ZZ) from your proposed changes area. <br> We are a successful business centre running for over 10 years with a foot fall of over 100 people per day. We would not be seeking to relocate or close-down within at least the next 20 years. | CA2 | BK has had a meeting with this land owner and explained the purpose of the masterplan and the Councils desire to support successful businesses through and changes. | No change proposed |
| A017.0 | Mr Suresh Patel | Improvements to Ealing Road, improve roads and routes, need better buses and accessibility for elderly people | Transport | Response: As a council we have an aspiration to secure a new bus route through the Borough which will go through Alperton, linking Sainsbury in the west with Beresford Avenue and Stonebridge Park Station. The council wil continue to work closely with Transport for London to negotiate improved frequency of the 224 bus route and the potentially new bus route as the new homes are delivered and demand increases. Section 7.4 has been updated with more information on the proposed new bus route. | 7.4 Reducing car use |
| A018.0 | Alice Francszzzuk | Doesn't see the point in consultation as Brent Council did not listen to concerns about Chequers Pub demolition. Parking too expensive for small businesses on Ealing Road. Low quality housing being built. Generally dissatisfied. | Transport | Unsupportive comment noted | No change proposed |
| A019.0 | No name left | Images on website not clear enough, wants to see plans, will come to event |  | No answer required | No change proposed |
| A020.0 | Madeleine Shea | General clarification of masterplan area. Requested email copy of masterplan. Subsequent email raised questions regarding the delivery and whether her property would be demolished. |  | Responded 12/01/2011 | No change proposed |

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| A021.0 | PS Dissanayaki | Paan spitting is still a real issue, spreads TB and is massively unhygienic, posters are not translated so people do not understand. Shops should not be allowed to sell the stuff. Lived here for 26 years, this has got very bad recently. | ASB | Response: While the masterplan cannot deal with every individual or particular problems related to ASB, it does provide support to ensure that in planning dwellings and neighbourhoods attention is given to planning out crime by adopting important design principles such as ensuring overlooking of spaces, providing good lines of sight and so-on. An amendment is proposed in section 4.0 to underline this important issue. It it is recognised that the council will need to work closely with other teams including SNT, parks and streetcare as the area is developed to tackle such issuesand section 11.1 has been updated to show this. | 4.0 Achieving the vision 11.1 Working with partners |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A022.0 | Dhiresh Bhagat/ Malik | Support growth in Alperton, want to see their own land developed but is currently shown as open space in CA2, would rather a 14 storey tower | CA2 | BK has had a meeting with this land owner and explained the purpose of the masterplan and the Councils desire to support local landowners. | No change proposed |
| A023.0 | GLA | Thank you for your letter on 6 January 2011 consulting the Mayor of London on this draft of the Alperton Masterplan Supplementary Planning Document (SPD). The Mayor has afforded me delegated authority to make comments on his behalf on emerging SPDs. The GLA welcomes the opportunity to consider the document at this draft stage. These comments are officer-level only and do not preclude any further comment the Mayor may make on future consultation phases of the Council's Local Development Framework. <br> The SPD appears comprehensive and should prove to be a useful tool for both planners and prospective developers. However, the SPD does raise a number of issues that would benefit from being considered in greater detail, which are set out in more detail below. | Supportive comment noted | No change proposed |  |
|  | GLA | Designation of Alperton <br> Brent Council's Core Strategy (2010) identifies Alperton as a Growth Area with the capacity to accommodate 1,600 residential units. The approach of preparing an SPD to provide further detail to guide development in this area is acceptable. However, the SPD may benefit from more clearly setting out the relationship between the Alperton SPD, the Core Strategy DPD and the London Plan at the beginning of the document. <br> The London Plan or adopted Core Strategy do not specifically identify Alperton as a 'local centre'. However, section 8.0 of the SPD refers to Alperton as a 'local centre'. These differences in definition could cause some confusion and should be addressed. <br> The Alperton Growth Area boundary appears different in the Core Strategy and Site Specific Alterations DPD's to the boundary shown in the SPD. The exact boundary of the area should be clarified. There are also differences in the boundary shown in the diagram on page 11 and the map on page 9 of the SPD. |  | Further explanation of relationship between Core Strategy, London Plan and SPD proposed. Reference to Alperton as a local centre changed to avoid confusion. Map boundaries clarified | 8.0-Alperton's Core |
| A023.10 | GLA | Blue ribbon network <br> The SPD promotes access the better management of the canal and the canal edge, which is strongly supported and is line with London Plan policies $4 \mathrm{C} .10,4 \mathrm{C} .11$ and 4 C .12 . Any proposals to build new bridges over the canal will need to carefully consider their impact on navigation, hydrology and biodiversity as set out in London Plan policy 4C.14. <br> The movement of people and freight on the water should be encouraged and therefore potential use of the canal to move freight needs to be acknowledged and ideally promoted within the SPD, in line with the London Freight Plan and taking account of the findings of the West London Canal Study available from Tfl's website: <br> http://www.tf.gov.uk/microsites/freight/water_freight.aspx <br> Reference is made to the possible release of land adjacent to the canal for mixed use development as there is potential to create a new working suburbia. The use of the river for freight and possible degradation of the residential amenity may undermine this approach. The Council should provide further evidence showing how these concerns would be addressed. | Waterside development | Consider affect on surrounding residential amenity, support for using canal to transport freight | 10.0 - Northfields |

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| A023.11 | GLA | Transport <br> The public transport use of Alperton Bus Garage should be expected to be retained in any redevelopment of the area. Specific protection for this site should be highlighted. The site should be protected from a change of use unless agreed with the GLA and TfL, either by relocation or no longer required. This is particularly important if the redevelopment plans are changing the character of the area such that there may be pressure to release the land for a different use. <br> The principle of improving the interchange is supported but care should be taken that proposals don't delay buses or add unnecessary mileage. However, the document could be more explicit in stating that transport improvements in the area will need to be funded externally. The following wording is suggested... "Contributions will be sought for transport infrastructure and service improvements to ensure that efficiency and capacity on the transport network is maintained and that the impact of the development on the transport network is mitigated. In circumstances where the combined impact of a number of developments creates the need for the provision of additional transport infrastructure and or services, it will be appropriate to pool the contributions from these developments having regard to the limitations on pooling arrangements imposed by the Community Infrastructure Regulations 2010. The level of contribution, whether pooled from a number of developments or not, may be based on a formula or standard charge which reflects the actual impact of the development." A further discussion on this would be welcomed. | Transport | Response: As a council we have an aspiration to secure a new bus route through the Borough which will go through Alperton, linking Sainsbury in the west with Beresford Avenue and Stonebridge Park Station. The council wil continue to work closely with Transport for London to negotiate improved frequency of the 224 bus route and the potentially new bus route as the new homes are delivered and demand increases. Section 7.4 has been updated with more information on the proposed new bus route. | 7.4 Reducing car use |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | GLA | A clear distinction should be made between a Community Infrastructure Levy (CIL), and legally binding planning obligations to avoid limiting the scope for funds; this is particularly important for Bus Network contributions which at present are not considered as infrastructure under the CIL. | Viability/ delivery | The council proposes a clarification on this point. The main infrastructure requirements required as a result of new housing and other development is set out in the councils Core Strategy (CP8). The SPD sets out in more detail where requirements such as open space may be located. In due course it is the councils intention to replace s 106 planning obligations largely by implementation of the Community Infrastructure Levy (CIL) although the local infrastructure requirements such as bus contributions would still be sought in s106 planning obligations. | 11.2 Deliverbility |
| Q023.125 | GLA | A road bridge link across the River Brent to connect to the North Circular Road is referenced. TfL understands that this may involve works within or close to our highway boundary and may have traffic implications for the connections to the A406 but is unlikely to have an impact on the A406 itself, which is grade separated at this point. However, further detailed work on this new connection is required. <br> The impact on the A406, Transport for London Road Network is likely to be manageable. However, the operation of the grade separated junction at Abbey Road and A404 Harrow Road onto the A406 should be reviewed. | CA3 | The representation is notes and text in section 10.2 changed to note that any new bridge and junction would be the subject of a detailed study to ensure that its elements are workable. | 10.2 - Northfields |
| A023.13 | GLA | The preparation of a strategic transport assessment should be promoted for each development site. This would simplify what is required and set a basis for transport contributions for buses and other modes. Reference to reducing car use is supported. However, collaboration is required to improve public transport accessibility and integrate bus stops and bus facilities into the development area. In the same context access by road (for goods and people) does need to be maintained/catered for appropriately and considered both in relation to the Masterplan and in relation to individual development proposal. | Transport | Response: The council has refered concerns raised about existing safety on Beresford Aveue to the Highways Department who are investigating this item. Opportunities for road and junction improvements and traffic calming if necessary will be investigated as part of the transport assessment for each individual development site. | No change proposed |

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| A023.14 | GLA | Walking can often be quicker than public transport, yet inconsistent signage and confusion about distances between areas put many people off walking. Legible London tackles these issues by presenting information in a range of ways, including on maps and signs, to help people find their way on foot. The application of Legible London within the SPD area would be supported and further information is available from TfL's website:http://www.tfl.gov.uk/microsites/legible-london/52.aspx <br> TfL will need to be consulted regarding any works at Alperton and Stonebridge Park stations, particularly with regards to bus stop layout. | Public Realm | Response: Public realm improvements are a central part of the proposals for Alperton, in order to create a legible and identifiable place which is pleasant and safe to walk around. The masterplan is to be read in conjunction with The Brent Placemaking Guide which sets out public realm policy and design guidelines. Contributions to the management and maintenance of open spaces will be required as part of any development proposal. Section 7.2 has been updated to reinforce the requirement to refer back to the Placemaking Guide and Section 11.1 has been update to show a commitment to working with partners and the community to improve public realm design and management and maintenance. | 7.2 - Destinations and Places 11.1 - Working with partners |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A023.15 | GLA | Energy <br> Section 7.5 recognises the potential role of decentralised energy system in this area. This is supported, however, the SPD presents an opportunity to carry out further work on the feasibility and delivery of such a system and it is recommended that further work be undertaken to help realise this potential. | Environmental sustainability | Feasibility and delivery of such a system would be contingent on the scale of development coming forward. | No change proposed |
| A023.02 | GLA | Infrastructure <br> The growth area is separated into three distinct character areas. Each area includes a series of 'projects or interventions' with associated delivery partners, which is supported. However, it may be beneficial to set out how these projects compare to the list of 'anticipated infrastructure' requirements set out in CP8 of the Core Strategy. | Physical and social infrastructure | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision <br> 7.3 Destinations and places |
|  | GLA | Employment land <br> Core Strategy policy CP2 identifies Alperton as a mixed use regeneration area along the Grand Union canal. The area will become an enterprise hub, with a new supply of modern light industrial units, studios and managed workspaces for creative industries, local business and artists to reinvigorate the local economy. This does not include the Northfields Industrial Estate, which is identified as Strategic Industrial Land. <br> The SPD separates the Alperton growth area into three areas, each with a different land use focus. The Alperton core area would be mixed use; the waterside community would be residential; and the Northfields estate has two options - option 1) industrial uses compatible with Strategic Industrial Land designation or option 2) residential led development with a mix of uses. <br> The proposed mix of uses for the Alperton core area and the waterside community are acceptable. However, the proposal for the Northfields estate raises a strategic planning policy concern. Option 1) 'a working suburb' promotes industrial uses only, which is acceptable; however, option 2) promotes an 'opportunity to introduce residential development along the canal', which is unacceptable. This approach is contrary to London Plan policy 2A.10, policy 3 B4 and policy 2.17 of the draft replacement London Plan (2009), the adopted Park Royal OAPF (2011), and Brent Council's adopted Core Strategy and Site Specific Allocations DPD. Any site specific amendment to this SIL boundary would need to be set out in a DPD and would need to be based on a detailed land and site review and agreed with the Greater London Authority. <br> Whilst the SPD does recognise the existing Strategic Industrial Land designation, the inclusion of option 2) in this SPD and the potential for residential development would cause confusion about the role of this area, and as such is not supported. | Housing/ density | Response: The council believes that the site presents a major opportunity not only to provide additional homes but also contribute to the delivery of the essential social and physical infrastructure that Alperton needs including potentially a new open space and is disappointed that the GLA are not flexible enough to consider some enabling development to see this site come forward. Due to the specific concerns raised by the GLA however the council accepts reluctantly that any review of the site allocation will need to be completed through a Development Plan Document and so has withdrawn any reference to any alternative development option for this area. Section 10.3 has been withdrawn. | 10.3- Opportunity to introduce residential development |
| A023.04 | GLA | Affordable housing and tenure <br> The SPD promotes the development of 1600 new homes within the Alperton Growth Area with supporting social and physical infrastructure. This level of housing is supported by the adopted Core Strategy, and does not raise a strategic planning policy concern. The Council should confirm that this level of housing is not dependent on delivery of housing as part of the Northfields Estate. <br> The SPD states that new residential development would have a target of $50 \%$ affordable housing, which is the same affordable housing target figure in the Core Strategy, which is acceptable. This figure is based on an affordable housing review undertaken by BNP Paribas. <br> A further discussion with the Council is required to explore the impacts that current changes to the affordable housing model and tenure split would have on affordable housing delivery in this area. | Housing/ density | The 1600 homes is not dependant on Northfields Industrial Estate so this figure does not need to change with its deletion as a housing site. In terms of $50 \%$ housing target, the council has prefaced the target with considerations of viability, notably because with the new grant regime, and the need to fulfil other planning objectives, such targets are appeaingto be increasingly unobtainable. | Note consequentially chnages on the housing targets |


| A023.05 | GLA | Housing mix <br> The Mayors housing strategy seeks $42 \%$ of social rented be provided as 3 bed + units. However, this is a London wide housing need, and it may be appropriate to adopt local variations. This SPD proposes a mix of unit types (by tenure) for each character area. This approach is broadly acceptable, however, these variations should be based on local evidence (taking account of need and viability) and this evidence should be provided to support the proposed housing mixes. <br> The three character areas have different housing mixes, including; flatted, higher density with a greater number of one and two beds in the Alperton Core Area; and lower rise, lower density family units in the waterside community area. The proposed approach of providing a different housing mix in each area is acceptable. [ | Housing/ density | noted |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A023.06 | GLA | Residential design standards <br> The proposal that all residential units meet the Mayor's Housing Design Guide is welcomed. However, the Council should recognise that not all of the standards in the Housing Design Guide are mandatory, and the SPD may benefit from highlighting those aspects of the guide that new residential development in this area would be expected to follow and setting out why. [] | Housing/ density | A discussion on whether the standards apply is too detailed for this document. It is proposed to make reference to the Housing Design Guide space standards in particular to provide emphasis and note that general consideration will be given to meeting other aspects. Each character area has been updated in line with this comment. | 8.4 - Alperton's core: a place to live 9.4- Waterside neighbourhood: a place to live |
| A023.07 | GLA | Building heights <br> The Alperton SPD states that taller buildings would be appropriate in the Alperton core area where there are some existing tall buildings, up to 17 -storeys in height. The principle of providing taller buildings in this accessible location, where there are other existing and permitted tall buildings is broadly acceptable. <br> However, further work on the location of these tall buildings within the core area could be included. It would be appropriate for the SPD to highlight those locations within the core area where taller buildings should be located. These decisions should be based on sound urban design principles, and an understanding of the impacts of a tall building on the surrounding area. This information is not clearly set out in the SPD and further detail should be provided. <br> The proposed waterside community has building heights of 'mainly' three stories. The approach is acceptable; however, the term 'mainly' could have a broader interpretation at the detailed planning application stage. To avoid confusion the SPD could benefit from setting out those circumstances where a building taller than 3 -storeys may be appropriate. [] | Housing/ density | Response: The masterplan actually restricts taller, higher density housing to one area at the junction of Ealing Road and the canal near to Alperton Station. This area is considered suitable for higher density housing as it has good public transport links and is well served by a range of local services and amenities. Further, this area is characterised by taller buildings, such as Middlesex House, the recently completed development on Atlip Road, and the permitted proposal for the $\mathrm{B} \& \mathrm{Q}$ site, and therefore this form of development is considered to be in keeping with the existing built environment. No changes to the masterplan are proposed. | No change proposed |
| $00^{23.08}$ | GLA | Design <br> The SPD proposes the development of three distinct areas, determined by design, land use, building form and typology, which is acceptable. The three areas are: <br> - Alperton's core <br> - The waterside residential neighbourhood <br> - Industrial transition zone - including Northfields <br> The SPD seeks to create a legible, permeable place, with improved connections with the wider area and promotes the development of an area that moves away from the current 'cul-de-sac' character of the area, which is supported. | Housing/ density | Supportive comment noted | No change proposed |
| A023.09 | GLA | The level of design detail included for each area is welcomed. It provides a clear understanding of layouts and building form. However, the SPD could be clearer about how prescriptive the proposed images are, and if there is scope within individual planning applications to vary development proposals from those included in the SPD. If this is the case there may be benefit in highlighting the 'key principles' required for each area. | Housing/ density | Response: The council has carried out a significant amount of testing of the layouts that are illustrated in the masterplan. Proposals within the central character area aim to show how the compact and tight-knit character described in the vision can be achieved whilst being sympathetic with the surrounding building heights and maintaining the spirit of existing planning requirements. The masterplan is intended to be clear about the scale of development that the council and local community expect whilst at the same time being flexible. In response to these comments Section 4.0 and Section 9.0 has been updated to reflect some of the comments received from developer/ landowners for example it has been made clear that maps and diagrams are for illustrative purposes only and that future applications will not be held up against them to get an exact match. | 4.0 Achieving the vision 9.0 Waterside neighbourhood |

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| A024.0 | Dr Bhatool | Interested in setting up and managing an elderly care home in Brent and that considers a location in Alperton to be suitable due to its residential nature, proximity to local shops and services, the Middlesex Hospital and your existing GP surgery at the Hillside Primary Care Centre. <br> Idea for the care home is that it is: <br> - A modern up to date care homes for the elderly <br> - Compliant with the latest EU regulations (which you are familiar with as you have experience in this field) <br> - A facility which has a multicultural use and caters to different cultures <br> - A facility that could be combined with a GP surgery, mobility shop and pharmacy <br> - $25-50$ bed facility <br> - 1 in 4 residents would require a parking space <br> - The facility must be a new build as it is not cost effective to refurbish existing properties to meet current regulations | Amenities | Response: Supported housing need in the borough accommodates a wide range of client groups, which include the some of the most vulnerable people in the borough, including frail elderly people and individuals and households with multiple, complex needs. The provision of new care and support accommodation, as well as the remodelling of existing facilities, to enable people to live more independently is a strategic priority for the borough (CP21). The extent, number and location of such housing should come out of a borough wide assessment of needs and analysis of available resources and this will inform the next version of the IIF for the Borough. No changes to the masterplan are proposed. | No change proposed |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A025.0 | Rev John Root | I have sent on my own comments about the plan, which particularly relate to the need for more provision for community activities. Our Church Centre in Stanley Avenue is in constant use with a full time nursery and often with other events such as parents and toddlers or after-school classes happening at the same time, as well as church services. We are very booked with our own services all through Sunday, and often turn down requests from independent congregations who are looking for a place to meet. I am sure if there was a facility like that in the canal area of the community it would get good use. | Physical and social infrastructure | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision 7.3 Destinations and places |
|  | Rev John Root | Looking through the document the number of new homes seems to be about nine hundred, although I have heard higher figures quoted, such as sixteen hundred. Is it possible for you to confirm how many homes you expect to be built as part of the development, and some idea of the population increase? | Housing/ density | Response: The decision to support growth in Alperton was already set out in the Core Strategy as one of the Boroughs Growth Areas. The Core Strategy (CP2) sets out the borough's plan for a sustainable population growth of 28,000 people by 2017 and the provision of at least 22,000 additional homes between 2007 and 2026. Over $85 \%$ of these new homes will be delivered in five growth areas, one of which is Alperton, where mixed use regeneration is identified as having the capacity to delivery a minimum of 1,600 new homes. The masterplan has tested the acceptability of this target, which is also informed by the LDF Site Specific Allocations. No changes are proposed to the masterplan. | No change proposed |
| $\underbrace{26.0}$ | Mr Narendra Morar | Please ensure public has access to all canal side, with disabled parking near the canal. | Waterside development | The proposals should ensure significantly enhanced access to the canal on the north side with new spaces for moorings. The south side will remain fully publicly accessible. | No change proposed |
| A026.1 | Mr Narendra Morar | Please also ensure there are lots of mooring points for canal boats and also shops and leisure facilities to make the area a destination poin for shopping and leisure. | Waterside development | Response: The masterplan promotes the installation of a range of types of additional mooring points along the canal in appropriate locations and these have been proved to be deliverable by developments on the ground. To introduce canalside character alongside new developments, the masterplan does also suggest that it may be possible to introduce inlets at appropriate locations, which may be full depth or shallow constructions. The deliverability of specific proposals (technical and financial) would need to be properly investigated through the planning process. | 7.1 A canal runs through it 10.0 Northfields |
| A026.2 | Mr Narendra Morar | I understand you design plan is to encourage a greener environment, but \| think there shoud be some mulitstory parking facilities for shoppers and tourists. | Transport | Response: The proposals in the masterplan have been designed so that, using the average parking ratios set out in Section 7.4, all new cars introduced to the area can be accommodated within the growth area boundary using a combination of on and off street parking. Car clubs and car sharing will also be encouraged in new development to reduce car use. If new development has an affect on parking availability on existing streets then the introduciton of controlled parking should be considered if it is in the interest of existing residents. Some residents have suggested that a multi storey car park should be built or developments should consider underground car parking, neither of these solutions have been proposed in the masterplan as they are considered to be unviable and contrary to sustainable development and the design principles of the masterplan Section 7.4 has been updated to reinforce this approach. | 7.4 Reducing car use |

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| A027.0 | Anon 01 | There is a lack of communty facilities in Alperton, doctors, post offices banks parks etc. | Physical and social infrastructure | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision 7.3 Destinations and places |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A027.1 | Anon 01 | I don't know about the new housing but there must be more services and facilities for new residents | as above | as above | 4.0 Achieving the vision 7.3 Destinations and places |
| A028.0 | Anon 02 | More accesses in ACS (i.e. more forms of entry for Alperton Community School) | Physical and social infrastructure | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision <br> 7.3 Destinations and places |
| A028.1 | Anon 02 | Cleaning up the canal area and redevelop the area | Waterside development | Response: Section 7.3 states that a series of new green spaces will be created as well as proposing improvements to existing open spaces which are detailed in the character area chapters. It is recognised that the masterplan could usefully provide more guidance on how the canal should be protected and enhanced. Relevant biodiversity and canal-side protection and enhancement measures that will be sought from development proposals will be added to section 7.5. | No change proposed |
| $e^{29.0}$ | Anon 03 | Carlyon Avenue width restriction beginning of road before bridge better signage to stop trucks passing through area. Should be access to NCR from Carlyon Road. | Transport | Response: Public realm improvements are a central part of the proposals for Alperton, in order to create a legible and identifiable place which is pleasant and safe to walk around. The masterplan is to be read in conjunction with The Brent Placemaking Guide which sets out public realm policy and design guidelines. Contributions to the management and maintenance of open spaces will be required as part of any development proposal. Section 7.2 has been updated to reinforce the requirement to refer back to the Placemaking Guide and Section 11.1 has been update to show a commitment to working with partners and the community to improve public realm design and management and maintenance. | 7.2 - Destinations and Places <br> 11.1 - Working with partners |
| A029.1 | Anon 03 | Should be underground parking. | Transport | Response: The proposals in the masterplan have been designed so that, using the average parking ratios set out in Section 7.4, all new cars introduced to the area can be accommodated within the growth area boundary using a combination of on and off street parking. Car clubs and car sharing will also be encouraged in new development to reduce car use. If new development has an affect on parking availability on existing streets then the introduciton of controlled parking should be considered if it is in the interest of existing residents. Some residents have suggested that a multi storey car park should be built or developments should consider underground car parking, neither of these solutions have been proposed in the masterplan as they are considered to be unviable and contrary to sustainable development and the design principles of the masterplan Section 7.4 has been updated to reinforce this approach. | 7.4 Reducing car use |
| A029.2 | Anon 03 | Woodside end should not be a thorughfare for traffic at Northfields. Should be accessto NCR but only allowing access for residents. | Transport | Response: Traffic calming and good street design including the introduction of home zones will ensure that this route does not become a rat run. No changes to the masterplan proposed. | No change proposed |

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| A030.0 | Anon 04 | Traffic calming on Beresford Avenue. | Transport | Response: The council has refered concerns raised about existing safety on Beresford Aveue to the Highways Department who are investigating this item. Opportunities for road and junction improvements and traffic calming if necessary will be investigated as part of the transport assessment for each individual development site. | No change proposed |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A030.1 | Anon 04 | Use canal to transport rubble | Waterside development | Consider affect on surrounding residential amenity, support for using canal to transport freight | 10.0 - Northfields |
| A031.0 | Anon 05 | Post offices | Physical and social infrastructure | The provision of post offices is outside of the councils control, the national policy currently is to reduce the number of post offices. | No change proposed |
| A031.1 |  | ... and GP's | Physical and social infrastructure | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision 7.3 Destinations and places |
| $\underbrace{\text { A032.0 }}$ | Anon 06 | More school places more GPs | Physical and social infrastructure | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision <br> 7.3 Destinations and places |
|  | Anon 06 | Do not bring extra cars | Transport | Response: The proposals in the masterplan have been designed so that, using the average parking ratios set out in Section 7.4, all new cars introduced to the area can be accommodated within the growth area boundary using a combination of on and off street parking. Car clubs and car sharing will also be encouraged in new development to reduce car use. If new development has an affect on parking availability on existing streets then the introduciton of controlled parking should be considered if it is in the interest of existing residents. Some residents have suggested that a multi storey car park should be built or developments should consider underground car parking, neither of these solutions have been proposed in the masterplan as they are considered to be unviable and contrary to sustainable development and the design principles of the masterplan Section 7.4 has been updated to reinforce this approach. | No change proposed |
| A033.0 | Anon 07 | Post offices, | Physical and social infrastructure | The provision of post offices is outside of the councils control, the national policy currently is to reduce the number of post offices. | No change proposed |
| A033.1 | Anon 07 | GP s and schools | Physical and social infrastructure | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision 7.3 Destinations and places |

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| A033.2 | Anon 07 | \|tidy up Carylon Road, | Public Realm | Response: Public realm improvements are a central part of the proposals for Alperton, in order to create a legible and identifiable place which is pleasant and safe to walk around. The masterplan is to be read in conjunction with The Brent Placemaking Guide which sets out public realm policy and design guidelines. Contributions to the management and maintenance of open spaces will be required as part of any development proposal. Section 7.2 has been updated to reinforce the requirement to refer back to the Placemaking Guide and Section 11.1 has been update to show a commitment to working with partners and the community to improve public realm design and management and maintenance. | 7.2 - Destinations and Places 11.1 - Working with partners |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A033.3 | Anon 07 | concerns about car parking | Transport | Response: The proposals in the masterplan have been designed so that, using the average parking ratios set out in Section 7.4 , all new cars introduced to the area can be accommodated within the growth area boundary using a combination of on and off street parking. Car clubs and car sharing will also be encouraged in new development to reduce car use. If new development has an affect on parking availability on existing streets then the introduciton of controlled parking should be considered if it is in the interest of existing residents. Some residents have suggested that a multi storey car park should be built or developments should consider underground car parking, neither of these solutions have been proposed in the masterplan as they are considered to be unviable and contrary to sustainable development and the design principles of the masterplan Section 7.4 has been updated to reinforce this approach. | No change proposed |
| $\begin{aligned} & \frac{0}{\left(\frac{a}{2}\right)^{33.4}} \\ & \frac{1}{D} \end{aligned}$ | Anon 07 | Water gas supply on Carylon Road pressure |  | It is the duty of the Statutory Undertaker to supply water and gas effectively, this is not in the councils control. | No change proposed |
| $\mathrm{N}^{4.0}$ | Anon 08 | Don't want shops spilling onto pavements more post offices | Public Realm | Response: Public realm improvements are a central part of the proposals for Alperton, in order to create a legible and identifiable place which is pleasant and safe to walk around. The masterplan is to be read in conjunction with The Brent Placemaking Guide which sets out public realm policy and design guidelines. Contributions to the management and maintenance of open spaces will be required as part of any development proposal. Section 7.2 has been updated to reinforce the requirement to refer back to the Placemaking Guide and Section 11.1 has been update to show a commitment to working with partners and the community to improve public realm design and management and maintenance. | 7.2 - Destinations and Places <br> 11.1-Working with partners |
| A034.1 | Anon 08 | More post offices | Physical and social infrastructure | The provision of post offices is outside of the councils control, the national policy currently is to reduce the number of post offices. | No change proposed |
| A035.0 | Ernest Griffith | Will it ever get delivered | Viability/ delivery | Response: The masterplan sets out a broad interpretation of the vision for Alperton, including building massing that is able to deliver approximately 1600 homes, as identified within the Core Strategy. On the basis of estimations of land values, construction costs and sales values, the council is comfortable that the proposals are deliverable across medium to long term development cycles. The viability of specific proposals will be tested through the planning process having consideration for the need to deliver mixed and sustainable development, including infrastructure to support development and affordable housing. | 11.0 Delivery |
| A035.1 | Ernest Griffith | Public toilets on High Street | Physical and social infrastructure | The council will look to take forward opportunities for more public toilets within the tight financial contstraints taken upon it. | No change proposed |

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| A040.4 | Dr Aadil Ali Khan | Residential care homes, nursing homes mobility shops. | Physical and social infrastructure | Response: Supported housing need in the borough accommodates a wide range of client groups, which include the some of the most vulnerable people in the borough, including frail elderly people and individuals and households with multiple, complex needs. The provision of new care and support accommodation, as well as the remodelling of existing facilities, to enable people to live more independently is a strategic priority for the borough (CP21). The extent, number and location of such housing should come out of a borough wide assessment of needs and analysis of available resources and this will inform the next version of the IIF for the Borough. No changes to the masterplan are proposed. | No change proposed |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A040.5 | Dr Aadil Ali Khan | Need for children and elderly. Elderly Care Homes, Part III Warden controlled accommodations | as above | as above | No change proposed |
| A041.0 | Karisma/ Vivek/ Soniya | Sports Club | Physical and social infrastructure | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision 7.3 Destinations and places |
| ${ }^{\text {A042.0 }}$ | Brian Gannon | Beresford Avenue not suitable for commercial vehicles - rat run which causes problems for businesses | Transport | Comment in line with intentions of masterplan | No change proposed |
| $\stackrel{A 043.0}{0}_{\square}$ | Dolores O'Connor | This development is long overdue it will enhance the usage of the undeveloped land and solve the housing needs | Supportive comment | Supportive comment noted | No change proposed |
| $\begin{aligned} & \stackrel{A}{2}^{(23.1} \\ & \frac{1}{D} \\ & \frac{1}{A} \\ & A \end{aligned}$ | Dolores O'Connor | There is a widespread industrial area in Park Royal already which could be further developed. Alperton should look at mainly residential development | Housing/ density | Response: As suggested within the document, the proposed masterplan is one interpretation of how development could come forward in Alperton, around suggested principles of streets and connections, adjacencies, use, character and housing mix. Suggested building heights are included to further explain the suggested interpretation and show consideration of the impact on adjacent and existing dwellings. Section 4.0 has been updated to make this intention clearer. | No change proposed |
| A043.2 | Dolores O'Connor | The development should have enough open area school and residnetial care homes for the local elderly also a doctors surgery and a dentist | Physical and social infrastructure | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision 7.3 Destinations and places |
| A043.3 | Dolores O'Connor | residnetial care homes | Physical and social infrastructure | Response: Supported housing need in the borough accommodates a wide range of client groups, which include the some of the most vulnerable people in the borough, including frail elderly people and individuals and households with multiple, complex needs. The provision of new care and support accommodation, as well as the remodelling of existing facilities, to enable people to live more independently is a strategic priority for the borough (CP21). The extent, number and location of such housing should come out of a borough wide assessment of needs and analysis of available resources and this will inform the next version of the IIF for the Borough. No changes to the masterplan are proposed. | No change proposed |
| A043.4 | Dolores O'Connor | Residential care homes and nursing care, doctors surgery and dentist | as above | as above | as above |
| A044.0 | V Paranthaman | This development is long overdue | Supportive comment | Supportive comment noted | No change proposed |

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| A044.1 | V Paranthaman | Further development could improve the park royal area | Supportive comment | Response: On the basis of availability of information, the council has a broad understanding of costs and values in the masterplan area and these are not perceived to be prohibitive. The 2009 Affordable Housing Viability Study concludes that although circumstances vary from site to site, it is appropriate for the council to maintain the $50 \%$ borough wide target and this is included within the Adopted LDF Core Strategy (2011). Development proposals that come forward will be tested for viability through the planning process having regard for a number of factors, including the deliver of affordable housing. In any case, it is not possible for the masterplan to introduce a policy that differs from the Core Strategy. | 10.3- Opportunity to introduce residential development |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A044.2 | V Paranthaman | Development should have schools and police station | Physical and social infrastructure | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision 7.3 Destinations and places |
|  | V Paranthaman | Residential care homes and nursing care, doctors surgery, dentist and pharmacy | Physical and social infrastructure | Response: Supported housing need in the borough accommodates a wide range of client groups, which include the some of the most vulnerable people in the borough, including frail elderly people and individuals and households with multiple, complex needs. The provision of new care and support accommodation, as well as the remodelling of existing facilities, to enable people to live more independently is a strategic priority for the borough (CP21). The extent, number and location of such housing should come out of a borough wide assessment of needs and analysis of available resources and this will inform the next version of the IIF for the Borough. No changes to the masterplan are proposed. | No change proposed |
| $87^{24.0} 8$ | Mr M A A Khan | This development is long overdue. It will enhance the usuage of the underdevelopment land and solve the housing needs | Supportive comment | Response: On the basis of availability of information, the council has a broad understanding of costs and values in the masterplan area and these are not perceived to be prohibitive. The 2009 Affordable Housing Viability Study concludes that although circumstances vary from site to site, it is appropriate for the council to maintain the $50 \%$ borough wide target and this is included within the Adopted LDF Core Strategy (2011). Development proposals that come forward will be tested for viability through the planning process having regard for a number of factors, including the deliver of affordable housing. In any case, it is not possible for the masterplan to introduce a policy that differs from the Core Strategy. | No change proposed |
| A045.1 | Mr M A A Khan | There is a widespread industrial area in Park Royal already which could be further developed. Alperton should look at mainly residential development. Improved communications and infrastructure will help | Housing/ density | Comment in line with intentions of masterplan | No change proposed |
| A045.2 | Mr M A A Khan | The development and regeneration shold have enough open areas, school and residential care homes for the local elderly. Also a doctor's surgery and dentist | Physical and social infrastructure | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision 7.3 Destinations and places |


| A045.3 | Mr M A A Khan | Residential care homesand nursing care, doctor's surgery, dentist | Physical and social infrastructure | Response: Supported housing need in the borough accommodates a wide range of client groups, which include the some of the most vulnerable people in the borough, including frail elderly people and individuals and households with multiple, complex needs. The provision of new care and support accommodation, as well as the remodelling of existing facilities, to enable people to live more independently is a strategic priority for the borough (CP21). The extent, number and location of such housing should come out of a borough wide assessment of needs and analysis of available resources and this will inform the next version of the IIF for the Borough. No changes to the masterplan are proposed. | No change proposed |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A046.0 | Abida Khan/ Ahmed Khan | Development within the social community is essential at this point in time. Creating the appropriate infrastructure will help greatly to enhance the community spirit with the generally neglected elderly | Physical and social infrastructure | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision <br> 7.3 Destinations and places |
| A047.1 | Abida Khan/ Ahmed Khan | There is a vast amount of industrial buildings that could be developed to support the elderly community. In addition to regeneration of buildings, transport requirements should also be considered | Transport | Response: The council has refered concerns raised about existing safety on Beresford Aveue to the Highways Department who are investigating this item. Opportunities for road and junction improvements and traffic calming if necessary will be investigated as part of the transport assessment for each individual development site. | No change proposed |
| U |  |  |  |  |  |
|  | Abida Khan/ Ahmed Khan | The development needs to provide appropriate social and community services which should at the very best include school, residential housing and medical services for the elderly | Physical and social infrastructure | Response: Supported housing need in the borough accommodates a wide range of client groups, which include the some of the most vulnerable people in the borough, including frail elderly people and individuals and households with multiple, complex needs. The provision of new care and support accommodation, as well as the remodelling of existing facilities, to enable people to live more independently is a strategic priority for the borough (CP21). The extent, number and location of such housing should come out of a borough wide assessment of needs and analysis of available resources and this will inform the next version of the IIF for the Borough. No changes to the masterplan are proposed. | No change proposed |
| A048.3 | Abida Khan/ Ahmed Khan | Care homes, doctors, dentist, pharmacy, entertainment centre | as above | as above | as above |
| A049.0 | Anon 19 | The riverside banks underdeveloped and neglected | Waterside development | Response: Section 7.3 states that a series of new green spaces will be created as well as proposing improvements to existing open spaces which are detailed in the character area chapters. It is recognised that the masterplan could usefully provide more guidance on how the canal should be protected and enhanced. Relevant biodiversity and canal-side protection and enhancement measures that will be sought from development proposals will be added to section 7.5 . | No change proposed |
| A049. 1 | Anon 19 | Needs a lot of capital to develop as planned. Private sector involvement is essential. | Housing/ density | Response: The masterplan sets out the vision of how regeneration can transform Alperton into three distinct character areas and describes each of these areas in terms of overall feel and character, land use, building height, street hierarchy, public realm, open space improvements and housing density, types and tenure. Moreover, building upon the LDF position on the need for development to be sustainable and supported by adequate social and physical infrastructure, the masterplan details a series of interventions and projects that will support the growth in the number of people living and working in Alperton. | No change proposed |

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| A049.12 |  | Energy efficient development. | Environmental Sustainability | Response: Section 7.5 has been updated to include more guidance on sustainable development including relevant biodiversity and canal-side protection and enhancement measures which will be sought from development proposals and an additional section 7.6 has been added on Environmental Protection. |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A049.13 |  | May lose the old architecture and replaced by modern building without character | Housing/ density | Response: The masterplan sets out the vision of how regeneration can transform Alperton into three distinct character areas and describes each of these areas in terms of overall feel and character, land use, building height, street hierarchy, public realm, open space improvements and housing density, types and tenure. Moreover, building upon the LDF position on the need for development to be sustainable and supported by adequate social and physical infrastructure, the masterplan details a series of interventions and projects that will support the growth in the number of people living and working in Alperton. | No change proposed |
|  <br> A049.2 <br>  <br> 0 <br> 0 <br> 0 <br> 0 | Anon 19 | Not well publicised for all people to know about the development, curretly I see there is lot of redundant land and underdeveloped. I can see from the master plan this is addressed to some degree | Housing/ density | Response: The council believes that the site presents a major opportunity not only to provide additional homes but also contribute to the delivery of the essential social and physical infrastructure that Alperton needs including potentially a new open space and is disappointed that the GLA are not flexible enough to consider some enabling development to see this site come forward. Due to the specific concerns raised by the GLA however the council accepts reluctantly that any review of the site allocation will need to be completed through a Development Plan Document and so has withdrawn any reference to any alternative development option for this area. Section 10.3 has been withdrawn. | 10.3- Opportunity to introduce residential development |
| $\begin{aligned} & \hline \mathbb{D}^{49.3} \\ & \mathbf{C} \\ & \underset{\sim}{c} \end{aligned}$ | Anon 19 | In view of the ongoing population there should be provision for residential and nursng homes in this new development. | Physical and social infrastructure | Response: Supported housing need in the borough accommodates a wide range of client groups, which include the some of the most vulnerable people in the borough, including frail elderly people and individuals and households with multiple, complex needs. The provision of new care and support accommodation, as well as the remodelling of existing facilities, to enable people to live more independently is a strategic priority for the borough (CP21). The extent, number and location of such housing should come out of a borough wide assessment of needs and analysis of available resources and this will inform the next version of the IIF for the Borough. No changes to the masterplan are proposed. | No change proposed |
| A049.4 | Anon 19 | None. Already too much space occupied by warehouses and industrial units | as above | as above | No change proposed |
| A049.5 | Anon 24 | Lack of car parking is a major issue | Transport | Response: The proposals in the masterplan have been designed so that, using the average parking ratios set out in Section 7.4, all new cars introduced to the area can be accommodated within the growth area boundary using a combination of on and off street parking. Car clubs and car sharing will also be encouraged in new development to reduce car use. If new development has an affect on parking availability on existing streets then the introduciton of controlled parking should be considered if it is in the interest of existing residents. Some residents have suggested that a multi storey car park should be built or developments should consider underground car parking, neither of these solutions have been proposed in the masterplan as they are considered to be unviable and contrary to sustainable development and the design principles of the masterplan Section 7.4 has been updated to reinforce this approach. | 7.4 Reducing car use |
| A049.6 | Anon 24 | More car parking required in the new development | as above | as above | as above |

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| A050.0 | Brian Wilson | GP provision, Parking, | Physical and social infrastructure | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision <br> 7.3 Destinations and places |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A050.1 | Brian Wilson | Green and open spaces | Physical and social infrastructure | Response: Section 7.3 - describes the councils approach to meeting open space requirements in Alperton, which includes improving existing open space and proposing locations of new open spaces which can be delivered through development. It has been noted that this section should provide more detail on how open spaces can be improved with a clear reference back to CP8 -Protection and enhancement of Open Space and the requirements of the Infrastructure Investment Framework. | 7.3 Destinations and places |
|  | Brian Wilson | Too many cars, parking lots, car ratios are not realistic | Transport | Response: The proposals in the masterplan have been designed so that, using the average parking ratios set out in Section 7.4, all new cars introduced to the area can be accommodated within the growth area boundary using a combination of on and off street parking. Car clubs and car sharing will also be encouraged in new development to reduce car use. If new development has an affect on parking availability on existing streets then the introduciton of controlled parking should be considered if it is in the interest of existing residents. Some residents have suggested that a multi storey car park should be built or developments should consider underground car parking, neither of these solutions have been proposed in the masterplan as they are considered to be unviable and contrary to sustainable development and the design principles of the masterplan Section 7.4 has been updated to reinforce this approach. | 7.4 Reducing car use |
| 9050.3 | Brian Wilson | Traffic calming on Beresford Avenue: Lights, sleeping policemen, cars parked on both sides | Transport | Response: The council has refered concerns raised about existing safety on Beresford Aveue to the Highways Department who are investigating this item. Opportunities for road and junction improvements and traffic calming if necessary will be investigated as part of the transport assessment for each individual development site. | No change proposed |
| A051.0 | C George | Better transport system forthe elderly. Quite difficult for them to travel with shopping from Sainsbury without trabnsport | Transport | Response: As a council we have an aspiration to secure a new bus route through the Borough which will go through Alperton, linking Sainsbury in the west with Beresford Avenue and Stonebridge Park Station. The council wil continue to work closely with Transport for London to negotiate improved frequency of the 224 bus route and the potentially new bus route as the new homes are delivered and demand increases. Section 7.4 has been updated with more information on the proposed new bus route. | 7.4 Reducing car use |
| A051.1 | C George | Create a new link from Atlip Road to Woodside End Improve access to Sainsburys | Public Realm | Comment in line with intentions of masterplan | No change proposed |
| A051.2 | C George | New road linking Woodside End and Mount Pleasant | as above | as above | No change proposed |

[^4]| A051.3 | C George | Improvements to Queensbury Road industrial estate. $\hat{A}$ Speed bumps on Carylon Road and some of the avenues.Some motorists seen these road as a motorway.Â Make Avenue in Abbey Estate either one way up or one way down. | Transport | Response: The council has refered concerns raised about existing safety on Beresford Aveue to the Highways Department who are investigating this item. Opportunities for road and junction improvements and traffic calming if necessary will be investigated as part of the transport assessment for each individual development site. | No change proposed |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A052.0 | Ms Rachel VictorSampson | Ealing Road from Alperton Station to Hgh Rd Wembley is the main area for congestion. Extending controlled parking and parking provision needs to be carefully considered. Residents around Mount Pleasant previously rejected a council proposal for this as parking is not an issue in certain areas. | Transport | Response: The proposals in the masterplan have been designed so that, using the average parking ratios set out in Section 7.4, all new cars introduced to the area can be accommodated within the growth area boundary using a combination of on and off street parking. Car clubs and car sharing will also be encouraged in new development to reduce car use. If new development has an affect on parking availability on existing streets then the introduciton of controlled parking should be considered if it is in the interest of existing residents. Some residents have suggested that a multi storey car park should be built or developments should consider underground car parking, neither of these solutions have been proposed in the masterplan as they are considered to be unviable and contrary to sustainable development and the design principles of the masterplan Section 7.4 has been updated to reinforce this approach. | 7.4 Reducing car use |
| A052.1 <br>  <br> 0 <br> 0 <br> 0 <br> 0 | Ms Rachel VictorSampson | This is an opportunity to enhance communitiy identity which will change with new communities coming into the area. It is important to allow some scope for those communities to shape Alperton also. The hindu temple is a beautiful building but not in character with it's surroundings. Keen to see how you will use these assets to development adistinctive character. Some sensitivity needed here as people of different faiths and heritage reside in the borough. | Housing/ density | Response: The masterplan sets out the vision of how regeneration can transform Alperton into three distinct character areas and describes each of these areas in terms of overall feel and character, land use, building height, street hierarchy, public realm, open space improvements and housing density, types and tenure. Moreover, building upon the LDF position on the need for development to be sustainable and supported by adequate social and physical infrastructure, the masterplan details a series of interventions and projects that will support the growth in the number of people living and working in Alperton. | No change proposed |
| $0^{2} 2.2$ | Ms Rachel VictorSampson | Should the big vision involve the creating of vibrant waterside space. Aside from housing could this are not be used to generate visitors, build the economy - look at areas like Paddington basin, Camden Lock. | Waterside development | Comment in line with intentions of masterplan | No change proposed |
| A052.3 | Ms Rachel VictorSampson | At present space in front of Alperton Staion allows passengers to be dropped off. This is a good thing as it does not create congestions. I would not like to see this change. Also bus stops congested. | Transport | Response: The council has refered concerns raised about existing safety on Beresford Aveue to the Highways Department who are investigating this item. Opportunities for road and junction improvements and traffic calming if necessary will be investigated as part of the transport assessment for each individual development site. | No change proposed |
| A052.4 | Ms Rachel VictorSampson | Youth provision is very poor in this area. Open spaces are unattractive. Scope to generate some community spirit warden schemes. Etc Heather Park Open space terribly underused. Scope to generate some community competition again around ideas, etc..Need to raise the ambition here and create some lovely low maintenance spaces. | Physical and social infrastructure | Response: Section 7.3 - describes the councils approach to meeting open space requirements in Alperton, which includes improving existing open space and proposing locations of new open spaces which can be delivered through development. It has been noted that this section should provide more detail on how open spaces can be improved with a clear reference back to CP8 -Protection and enhancement of Open Space and the requirements of the Infrastructure Investment Framework. | 7.3 Destinations and places |
| A052.5 | Ms Rachel VictorSampson | Comments re: Heather Park Open space on previous. | as above | as above | as above |
| A053.0 | M H Noor Khan | Thanks for asking Housing Needs and Public toilets have been your priroties for ages. I am sure still it is on your priorty list | Physical and social infrastructure | The council will look to take forward opportunities for more public toilets within the tight financial contstraints taken upon it. | No change proposed |

Table of consultation comments

| A053.1 | M H Noor Khan | Industrial area has been developed but residential area still needs attention | Public Realm | Response: Public realm improvements are a central part of the proposals for Alperton, in order to create a legible and identifiable place which is pleasant and safe to walk around. The masterplan is to be read in conjunction with The Brent Placemaking Guide which sets out public realm policy and design guidelines. Contributions to the management and maintenance of open spaces will be required as part of any development proposal. Section 7.2 has been updated to reinforce the requirement to refer back to the Placemaking Guide and Section 11.1 has been update to show a commitment to working with partners and the community to improve public realm design and management and maintenance. | 7.2 - Destinations and Places 11.1 - Working with partners |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A053.2 | M H Noor Khan | Schools and residnetial care homes for the local elderly. Doctors surgery, dentist, chiropodist and keep fit facility for elderly required | Physical and social infrastructure | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision 7.3 Destinations and places |
|  | M H Noor Khan | Residential care houses and hursing case, Doctors surgery, detish, pharmacy, chiropodist, keep fit for elderly, | Physical and social infrastructure | Response: Supported housing need in the borough accommodates a wide range of client groups, which include the some of the most vulnerable people in the borough, including frail elderly people and individuals and households with multiple, complex needs. The provision of new care and support accommodation, as well as the remodelling of existing facilities, to enable people to live more independently is a strategic priority for the borough (CP21). The extent, number and location of such housing should come out of a borough wide assessment of needs and analysis of available resources and this will inform the next version of the IIF for the Borough. No changes to the masterplan are proposed. | No change proposed |
| Cob3.4 |  | ... public toilets are required. | Physical and social infrastructure | The council will look to take forward opportunities for more public toilets within the tight financial contstraints taken upon it. | No change proposed |
| A054.0 | P Pandya | Footbridge between Queensbury Rd \& Nth Circular no lighting in poor repair. | Public Realm | Response: Brent Councils Placemaking Guide sets out the importance of having an adequately funded and coordinated street management and maintenance regime, all Council departments and other agencies whose actions have an impact on the public realm must adopt a philosophy of care and better design in the first instance can reduce maintenance costs in the long term. Section 7.3 has been updated to give stronger links back to the Brent Placemaking Guide and with more emphasis on management and maintenance. | 7.3 Destinations and places |
| A054.1 |  | Bus needed into the Abbey Estate. | Transport | Response: As a council we have an aspiration to secure a new bus route through the Borough which will go through Alperton, linking Sainsbury in the west with Beresford Avenue and Stonebridge Park Station. The council wil continue to work closely with Transport for London to negotiate improved frequency of the 224 bus route and the potentially new bus route as the new homes are delivered and demand increases. Section 7.4 has been updated with more information on the proposed new bus route. | 7.4 Reducing car use |
| A054.2 |  | Overgrown. No HGVs past Brent Vale Ave, Carlyon Rd. The tear up the road and break the pavements Where is the neighbourhood watch scheme.doesit exist?Pavements and roads in Abbey Rd estate broken | as above | as above | 7.3 Destinations and places |

Table of consultation comments

| A054.3 | P Pandya | No to the tower blocks especially the 12 storey ones. | Housing/ density | Response: The masterplan actually restricts taller, higher density housing to one area at the junction of Ealing Road and the canal near to Alperton Station. This area is considered suitable for higher density housing as it has good public transport links and is well served by a range of local services and amenities. Further, this area is characterised by taller buildings, such as Middlesex House, the recently completed development on Atlip Road, and the permitted proposal for the B\&Q site, and therefore this form of development is considered to be in keeping with the existing built environment. No changes to the masterplan are proposed. | No change proposed |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A054.4 |  | Why is the Abbey Estate being left out. While theresto fo Alperton gets a makeover?No flats at Carlyon Road entrance | Housing/ density | The growth area includes only land which is currently industrial in use, existing residential communities which surround the growth area are still included in the transformation agenda. During the development of the SPD Abbey Estate has been has consistently engaged and included and will continue to be. | No change proposed |
| A054.5 | P Pandya | Help improve Abbey Estate.Roads are torn up by HGV's pavements broken, a bus link is needed into the estate | Transport | Response: As a council we have an aspiration to secure a new bus route through the Borough which will go through Alperton, linking Sainsbury in the west with Beresford Avenue and Stonebridge Park Station. The council wil continue to work closely with Transport for London to negotiate improved frequency of the 224 bus route and the potentially new bus route as the new homes are delivered and demand increases. Section 7.4 has been updated with more information on the proposed new bus route. | 7.4 Reducing car use |
| $\begin{aligned} & \tilde{U}^{4.6} \\ & \text { مu } \\ & \hline \text { en } \end{aligned}$ | P Pandya | Why do you need to consolidate all the industries around the estate? | CA3 | The SPD suggests that any displaced businesses could be relocated to Northfields Industrial Estate, the council would support the development of new affordable workspaces for local businesses. | No change proposed |
| $\mathrm{A}_{55.0}$ | R P Spearpoint | Prefer low rise buildings especially for housing, tall buildings also create strong winds between them. | Housing/ density | Comment in line with intentions of masterplan | No change proposed |
| $1$ | R P Spearpoint | Industry - how to create new employment. |  | The SPD aims to protect and enhance the viability and vitality of Ealing Road as a District Centre and also to exploit Alpertons proximity to Park Royal Industrial Estate to create more jobs. The SPD also encourages the provision of affordable workspace and modern business space for economic growth. | No change proposed |
| A055.2 | R P Spearpoint | Need to consider medical services/dentists/school places. | Physical and social infrastructure | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision <br> 7.3 Destinations and places |
| A055.3 | R P Spearpoint | Utilising - drainage/infrastructure/water supply/heat etc |  | It is the duty of the Statutory Undertaker to supply water and gas effectively, this is not in the councils control. | No change proposed |
| A055.4 | R P Spearpoint | Local residents should decide | Viability/ delivery | Response: Section 11.1 has been update to show a commitment to working with partners and the community during delivery stage. | 11.1 Working with partners |
| A056.0 | Rev John Root | There is a great need for more commounity spaces and community centre. St James Church Centre is in full use through the wreck usually with 2 or 3 events concurrently. In particular we have request for after school education and for church services of other denominations. What thought has been given to the need for extra school spaces | Physical and social infrastructure | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision <br> 7.3 Destinations and places |

Prepared by beth.kay 27/06/2011
Table of consultation comments

| A057.0 | Robert Hastings | You have proposed nothing it up to the private builder to propose and the council accept planning permission which will be high rise flats and all the problem with them. | Housing/ density | Response: The masterplan actually restricts taller, higher density housing to one area at the junction of Ealing Road and the canal near to Alperton Station. This area is considered suitable for higher density housing as it has good public transport links and is well served by a range of local services and amenities. Further, this area is characterised by taller buildings, such as Middlesex House, the recently completed development on Atlip Road, and the permitted proposal for the B\&Q site, and therefore this form of development is considered to be in keeping with the existing built environment. No changes to the masterplan are proposed. | No change proposed |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A057.1 |  | What I have been informaed is that: <br> a) The whole project will cost nothing to the cuoncil (which is good) <br> b) Because the land is not owned by the council will delay the contract by at least a further 10 years <br> c) Cost as the council have no idea what the build will be able to build far sale let [0 | Viability/ delivery | Response: The masterplan sets out a broad interpretation of the vision for Alperton, including building massing that is able to deliver approximately 1600 homes, as identified within the Core Strategy. On the basis of estimations of land values, construction costs and sales values, the council is comfortable that the proposals are deliverable across medium to long term development cycles. The viability of specific proposals will be tested through the planning process having consideration for the need to deliver mixed and sustainable development, including infrastructure to support development and affordable housing. | 11.0 Delivery |
|  |  | d) services provided such as extra school plaecs/ doctors <br> e) when constructing large blocks the land around has to be kept open. I think you try far too much and show spread over longer period | Physical and social infrastructure | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision <br> 7.3 Destinations and places |
| $\overline{\text { (1) }} 57.3$ | Robert Hastings | I think you should inspect what Ealing Road building along the canal. And contact them if any problem occur.Â The building contractor will only build if he can sell as at Wembley Park Â | as above | as above | 11.0 Delivery |
| $\mathrm{N}^{8} 58.0$ | Geoff Lumley | Need community hall space for workship, meetings, gatherings all existing such buildings are on Ealing road (Stanley Avenue) not in the development site | Physical and social infrastructure | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision 7.3 Destinations and places |
| A058.1 | Geoff Lumley | As before - more community space indoors | as above | as above | as above |
| A059.0 | M J Ranchhoddas | The area recent development is already congested. | Housing/ density | Response: The decision to support growth in Alperton was already set out in the Core Strategy as one of the Boroughs Growth Areas. The Core Strategy (CP2) sets out the borough's plan for a sustainable population growth of 28,000 people by 2017 and the provision of at least 22,000 additional homes between 2007 and 2026. Over $85 \%$ of these new homes will be delivered in five growth areas, one of which is Alperton, where mixed use regeneration is identified as having the capacity to delivery a minimum of 1,600 new homes. The masterplan has tested the acceptability of this target, which is also informed by the LDF Site Specific Allocations. No changes are proposed to the masterplan. | No change proposed |
| A059.1 | M J Ranchhoddas | No improvements to the basics like propert tube station, proper bus stops, | Transport | Response: As a council we have an aspiration to secure a new bus route through the Borough which will go through Alperton, linking Sainsbury in the west with Beresford Avenue and Stonebridge Park Station. The council wil continue to work closely with Transport for London to negotiate improved frequency of the 224 bus route and the potentially new bus route as the new homes are delivered and demand increases. Section 7.4 has been updated with more information on the proposed new bus route. | 7.4 Reducing car use |

[^5]| A059.2 | M J Ranchhoddas | proper pavements, blocked drainage on roads pot holes on roads, railings not kept proper. Resurfacing work carried out on road from Alperton School to Bridgewater Road is substandard, water already seeping near Alperton School | Public Realm | Response: Public realm improvements are a central part of the proposals for Alperton, in order to create a legible and identifiable place which is pleasant and safe to walk around. The masterplan is to be read in conjunction with The Brent Placemaking Guide which sets out public realm policy and design guidelines. Contributions to the management and maintenance of open spaces will be required as part of any development proposal. Section 7.2 has been updated to reinforce the requirement to refer back to the Placemaking Guide and Section 11.1 has been update to show a commitment to working with partners and the community to improve public realm design and management and maintenance. | 7.2 - Destinations and Places <br> 11.1 - Working with partners |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A059.3 | M J Ranchhoddas | I would like the area proposed for development $\mathrm{i}, \mathrm{e}$ behind Woodside Avenue needs specific plans and not just say we want to develop | Housing/ density | Comment in line with intentions of masterplan | No change proposed |
| A059.4 | M J Ranchhoddas | The approach should be specific plans. Basic to put right for existing residents. Road linking Woodside End and Mount Pleasant which will create RAT RUN is not acceptable | Transport | Response: Traffic calming and good street design including the introduction of home zones will ensure that this route does not become a rat run. No changes to the masterplan proposed. | No change proposed |
| A059.5 | M J Ranchhoddas | Open space at B\&Q site. | Physical and social infrastructure | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision <br> 7.3 Destinations and places |
|  |  | Road improvements at junction of Ealing Road and Mount Pleasant. | Transport | Response: The council has refered concerns raised about existing safety on Beresford Aveue to the Highways Department who are investigating this item. Opportunities for road and junction improvements and traffic calming if necessary will be investigated as part of the transport assessment for each individual development site. | No change proposed |
| $\omega^{8.59 .7}$ |  | Do not agree with Create a new link for Atlip Road to Woodside End. | as above | as above | No change proposed |
| A059.8 |  | Do not agree to improve access to Sainsburys. | Public Realm | Unsupportive comment noted | No change proposed |
| A059.9 |  | It would be better to link Mt Pleasant to Ealing Rd over the CANAL for traffic not congestion to residential area existing at the moment at Woodside Aveetc, as your present proposal would only create problem to joing Mt Pleasant via Woodside Avenue | as above | as above | No change proposed |
| A060.0 | M McCann | It does need updating and more facilities for families. But we do not want High rise ghetto style estates | Physical and social infrastructure | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision <br> 7.3 Destinations and places |
| A060.1 | M McCann | Health, Doctros, Surgeries will need to be improved due to increase size of opoulation. also education needs will have to be improved. At present there is no bus service on the Abbey Estate itself - so travel when yu are a carer for someone who is a wheelchair user is very difficult to access | as above | as above | 4.0 Achieving the vision <br> 7.3 Destinations and places |


| A060.1 | M McCann | Provided the housing is not to high and tenants respect their surrondings and neighbours. | Housing/ density | Response: The masterplan actually restricts taller, higher density housing to one area at the junction of Ealing Road and the canal near to Alperton Station. This area is considered suitable for higher density housing as it has good public transport links and is well served by a range of local services and amenities. Further, this area is characterised by taller buildings, such as Middlesex House, the recently completed development on Atlip Road, and the permitted proposal for the B\&Q site, and therefore this form of development is considered to be in keeping with the existing built environment. No changes to the masterplan are proposed. | No change proposed |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A061.0 | Miss Selladurai Kalanee | Improve access to sainsbury |  |  |  |
| A062.0 | Mr \& Mrs Danish | This development is necessary. It will booost the usage of underdeveloped places and solve the housing need | Supportive comment | Supportive comment noted | No change proposed |
|  | Mr \& Mrs Danish | Alperton already has got a sufficient industrial area which could be more developed. It needs more residential development, improved communication and infrastructure | Housing/ density | Response: The council believes that the site presents a major opportunity not only to provide additional homes but also contribute to the delivery of the essential social and physical infrastructure that Alperton needs including potentially a new open space and is disappointed that the GLA are not flexible enough to consider some enabling development to see this site come forward. Due to the specific concerns raised by the GLA however the council accepts reluctantly that any review of the site allocation will need to be completed through a Development Plan Document and so has withdrawn any reference to any alternative development option for this area. Section 10.3 has been withdrawn. | 10.3- Opportunity to introduce residential development |
| $\frac{1}{8^{682.2}}$ | Mr \& Mrs Danish | There should be more places of enjoyment and sports for young children. | Physical and social infrastructure | Response: Section 7.3 - describes the councils approach to meeting open space requirements in Alperton, which includes improving existing open space and proposing locations of new open spaces which can be delivered through development. It has been noted that this section should provide more detail on how open spaces can be improved with a clear reference back to CP8 -Protection and enhancement of Open Space and the requirements of the Infrastructure Investment Framework. | 7.3 Destinations and places |
| A062.3 | Mr \& Mrs Danish | Doctors surgery, Nursing Homes, Pharmacy | Physical and social infrastructure | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision 7.3 Destinations and places |
| A062.4 | Mr \& Mrs Danish | More old age centres will help local elderly people | Physical and social infrastructure | Response: Supported housing need in the borough accommodates a wide range of client groups, which include the some of the most vulnerable people in the borough, including frail elderly people and individuals and households with multiple, complex needs. The provision of new care and support accommodation, as well as the remodelling of existing facilities, to enable people to live more independently is a strategic priority for the borough (CP21). The extent, number and location of such housing should come out of a borough wide assessment of needs and analysis of available resources and this will inform the next version of the IIF for the Borough. No changes to the masterplan are proposed. | No change proposed |

Table of consultation comments

| A063.0 | Mr Narendra Morar | Please ensure public has access to all canal side, with disabled parking near the canal. | Waterside development | Response: On the basis of availability of information, the council has a broad understanding of costs and values in the masterplan area and these are not perceived to be prohibitive. The 2009 Affordable Housing Viability Study concludes that although circumstances vary from site to site, it is appropriate for the council to maintain the $50 \%$ borough wide target and this is included within the Adopted LDF Core Strategy (2011). Development proposals that come forward will be tested for viability through the planning process having regard for a number of factors, including the deliver of affordable housing. In any case, it is not possible for the masterplan to introduce a policy that differs from the Core Strategy. | No change proposed |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A063.1 | Mr Narendra Morar | Please also ensure there are lots of mooring points for canal boats and also shops and leisure facilities to make the area a destination point for shopping and leisure. | Waterside development | Response: The masterplan promotes the installation of a range of types of additional mooring points along the canal in appropriate locations and these have been proved to be deliverable by developments on the ground. To introduce canalside character alongside new developments, the masterplan does also suggest that it may be possible to introduce inlets at appropriate locations, which may be full depth or shallow constructions. The deliverability of specific proposals (technical and financial) would need to be properly investigated through the planning process. | 7.1 A canal runs through it 10.0 Northfields |
|  | Mr Narendra Morar | I understand you design plan is to encourage a greener environment, but \| think there shoud be some mulitstory parking facilities for shoppers and tourists. | Transport | Response: The proposals in the masterplan have been designed so that, using the average parking ratios set out in Section 7.4, all new cars introduced to the area can be accommodated within the growth area boundary using a combination of on and off street parking. Car clubs and car sharing will also be encouraged in new development to reduce car use. If new development has an affect on parking availability on existing streets then the introduciton of controlled parking should be considered if it is in the interest of existing residents. Some residents have suggested that a multi storey car park should be built or developments should consider underground car parking, neither of these solutions have been proposed in the masterplan as they are considered to be unviable and contrary to sustainable development and the design principles of the masterplan Section 7.4 has been updated to reinforce this approach. | 7.4 Reducing car use |
| A064.0 | QARA Group of Associations (Robert Dunwell) | Throughout this Alperton Master Plan there is either no or very little flow down of quantum, type or descriptive requirements from the respective parts of the Core Strategy that refer to the Alperton Growth area. This whole Masterplan lacks any of the aforementioned detail that is normally expected from such a document; specified in National statutory guidances and requirements. | Housing/ density | Large parts of the document have been rewritten to reinforce the relationship with the Core Strategy | Whole document |
| A064.1 | QARA Group of Associations (Robert Dunwell) | As but one example of this is the way that the Core stategy requiremnts for open space are but mentioned in vague / most general terms such as " open space will be provided" and suchlike. No attempt has been made to quantify flowed down requirements of open space and its use for all the masterplan individual sites as is given in various parts of the Core Strategy. | Physical and social infrastructure | Response: Section 7.3 - describes the councils approach to meeting open space requirements in Alperton, which includes improving existing open space and proposing locations of new open spaces which can be delivered through development. It has been noted that this section should provide more detail on how open spaces can be improved with a clear reference back to CP8 -Protection and enhancement of Open Space and the requirements of the Infrastructure Investment Framework. | 7.3 Destinations and places |
| A064.2 |  | This near total lack of definition in the Masterplan gives no assurity whatesoever that the requirements of the Core Strategy will or can be met. The whole document needs rewriting with respective details as indicated above been taken from the Core Strategy, National and London statutory planning, architectural ( good practice guides) and building documentation. |  | As a result of the comments received many parts of the SPD have been rewritten to strengthen the references back to the Core Strategy and other local and national policy. However, it is not the intention of this document to repeat policy which already exists, rather this document acts a supplementary document to the Core Strategy in policies therein. |  |
| A065.0 | Solomon Rojohn | The ACE cafe poses problems quite often with bikers racing between the Ace Cafe and Stonebridge Park blocking the NCRoad. Planners need to take this into account | Transport |  |  |

Table of consultation comments

| A065.1 | Solomon Rojohn | Concerns over increased number of sewers blocked near station causes floods in Ealing Road. | Environmental Sustainability | Reference to potential impact of development on water and waste water infrastructure and need to demonstrate adequate capacity will be added to section 7.5. | 7.5 Environmental Sustainability |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A065.2 | Solomon Rojohn | Also how will the road system cope with increased traffic. | Transport | Response: The council has refered concerns raised about existing safety on Beresford Aveue to the Highways Department who are investigating this item. Opportunities for road and junction improvements and traffic calming if necessary will be investigated as part of the transport assessment for each individual development site. | No change proposed |
| A065.3 | Solomon Rojohn | Need for more doctors surgery, dentists, schools. | Physical and social infrastructure | Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer. | 4.0 Achieving the vision <br> 7.3 Destinations and places |
| A065.4 | Solomon Rojohn | Better transport system needed. Too many heavy goods vehicles when buidligns strain n local needs of local residents. Atlip Road development shows increased traffic. Any compensation for residnets because of this? | Transport | Response: The council has refered concerns raised about existing safety on Beresford Aveue to the Highways Department who are investigating this item. Opportunities for road and junction improvements and traffic calming if necessary will be investigated as part of the transport assessment for each individual development site. | No change proposed |
| $\stackrel{0}{0}_{0^{66.0}}^{0^{0}}$ | Tracy Hall | The towpath along the canal is my biggest concern. There are no longer any benches to sit and rest. there are no bins and rubbish fills the grass and shrubbery alongside the path | Waterside development | Response: Section 7.3 states that a series of new green spaces will be created as well as proposing improvements to existing open spaces which are detailed in the character area chapters. It is recognised that the masterplan could usefully provide more guidance on how the canal should be protected and enhanced. Relevant biodiversity and canal-side protection and enhancement measures that will be sought from development proposals will be added to section 7.5. | 7.3 - Destinations and places 7.5 - Environmental sustainability |
| A066.1 | Tracy Hall | I think the shrubbery and mess can be removed from the canal path to widen it to allow room for cyclists and walkers to use it more safely. Also benches, rubbish bins and dog waste could be added to enhance the use of the path. I use thepath everyday and would like to see changes like this | Waterside development | Response: Although British Waterways will be principally responsible for the maintenance and upkeep of the tow path, new development in this area is likely to significantly increase the numbers of those using such spaces. The council will work together with developer partners and statutory undertakers in order to ensure that the canal is a successful public space and reasonable contributions to public realm improvements will be sought and negotiated upon as development comes forward. No change to the masterplan is proposed. | No change proposed |
| A066.2 | Tracy Hall | It would be nice to see this actually happen and not just be talked about | Viability/ delivery | Response: The masterplan sets out a broad interpretation of the vision for Alperton, including building massing that is able to deliver approximately 1600 homes, as identified within the Core Strategy. On the basis of estimations of land values, construction costs and sales values, the council is comfortable that the proposals are deliverable across medium to long term development cycles. The viability of specific proposals will be tested through the planning process having consideration for the need to deliver mixed and sustainable development, including infrastructure to support development and affordable housing. | 11.0 Delivery |


| A066.3 | Tracy Hall | Widening of tow path and addig of benches and bins | Waterside development | Response: Section 7.3 states that a series of new green spaces will be created as well as proposing improvements to existing open spaces which are detailed in the character area chapters. It is recognised that the masterplan could usefully provide more guidance on how the canal should be protected and enhanced. Relevant biodiversity and canal-side protection and enhancement measures that will be sought from development proposals will be added to section 7.5. | 7.5 Environmental Sustainability |
| :---: | :---: | :---: | :---: | :---: | :---: |
| A066.4 | Tracy Hall | The lights on ealing road opposite Ford garage from Hanger Lae should make access easier to Carylon Road by addiing a filter right arrow. Lanes should be better designed for this. This would make safety better. Please could this go to next local implementation plan (brent transportation department) | Transport | Response: The council has refered concerns raised about existing safety on Beresford Aveue to the Highways Department who are investigating this item. Opportunities for road and junction improvements and traffic calming if necessary will be investigated as part of the transport assessment for each individual development site. | 7.4 Reducing car use |
| A066.5 | Tracy Hall | On Carylon Road is a small row of shop including a newsagent, hairdresser. In between are at least 3 unused shops that could be re-opened as Fish \& Chip[s, Bakers, grocers etc | Retail |  |  |

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Brent Council - Planning Committee 12 July 2011
ALPERTON MASTERPLAN SPD
Appendix 2
Consultation Report - JUNE 2011

## 1. Introduction

1.1. The draft Alperton Masterplan SPD underwent formal (statutory) consultation in January and February 2011. This document has been prepared as a record of the consultation carried out; it provides an overview of the results of the consultation and a commentary on the representations received.
2. Brent's Consultation Strategy
2.1. Brent Council is committed to listening to what local people have to say about services and what they want to see happen in their area. We want to continue to develop and build services on what people want.
2.2. The following principles and quality standards are mandatory for all consultation undertaken by Brent Council:

- Procedural - All consultation activity will be discussed with the council's corporate consultation team at the planning stage and all such planned activity will be logged on the corporate consultation database; 'Consultation Tracker'
- We will explain why we're consulting and how we're going to take people's views into account.
- We will involve the widest spectrum of the community in our consultations, including under-represented, marginalised and 'hard to reach' groups.
- We will organise consultation in ways which are convenient and accessible to the people whose views we are seeking.
- We will act on the findings to improve services, programmes and quality of life for local residents.
- We will report back to the public what they've told us during the consultation and what we've done as a result of it.


## 3. Background

3.1. In December 2009 the council's Executive approved a vision for Alperton, which was illustrated and published in a prospectus document used to describe the vision to stakeholders and statutory partners. The vision for Alperton was generated through consultation with residents, local businesses, Council Officers, landowners and Statutory Partners. Details of
this consultation are set out in the Alperton Consultation Report dated 12 August 2009.
3.2. The draft Alperton Masterplan SPD was then developed by the project team during 2010, using the vision document as a foundation for the proposals.
3.3. Support for the document to proceed to public consultation was given at CMT in September 2010. Approval to carry out public consultation on the SPD was given by Planning Committee in October 2010. The draft SPD was formerly consulted on in January and February 2011.
3.4. The consultation commenced on the $5^{\text {th }}$ January 2011 and closed on $25^{\text {th }}$ February 2011, a total period of seven weeks. The public consultation was carried out in line with the Council's statutory obligations set out in the Planning and Compulsory Purchase Act 2004. This act seeks to ensure greater public participation and transparency in the planning process.
3.5. The Council has followed the general consultation process for a Supplementary Planning Document as set out in the Statement for Community Involvement (SCI) and has actually gone over and above these minimum requirements in order to ensure that the content of the SPD genuinely reflects the wants and needs of the local community.
4. Information/ raising awareness:
4.1. The following outlines the methods of communication used to raised awareness of the consultation, this took place in the weeks leading up to the launch of the consultation period:

- Letter sent to approximately 2500 residents and local businesses in Alperton to inform them of the consultation taking place - refer to figure 1 for a map showing the extent of the mail drop.
- Public notice published in Wembley Times
- Consultation website prepared - using Objective (Planning Portal) which allows consultees to view the SPD and directly enter their comments through a web-hosted version of the SPD
- Brent Council website www.brent.gov.uk/alperton updated with a summary of document and downloadable pdf of the SPD
- Email address set up (alperton@brent.gov.uk)
- E-mails sent to:
- All known major landowners within SPD area
- Statutory consultees: British Waterways, English Heritage, Environment Agency, Natural England, CABE, GLA, GoL, London Development Agency, Network Rail, Thames Water, Transport for London, Natural

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England, Department for Business, Innovation and Skills etc, Ealing Council

- Residents associations and youth groups in Alperton
- Other stakeholders: Councillors, RSLs
- SPD hard copies made available at for viewing at Brent House One Stop Shop, Town Hall One Stop Shop, Town Hall Library, Ealing Road Library, Tokygnton Library, also St James Church, Stanley Avenue
- Posters in local Schools for display
- Notices tied onto lamp posts inside the area and at the main junctions entering the SPD area
- One to one meetings with local Councillors

5. Display of the SPD and Public Exhibitions:
5.1. A summary of the SPD was prepared as the SPD itself was considered to be too long to be genuinely accessible to members of the local community, this summary was published with the SPD in all the forums listed above, a copy of this summary is included in Appendix 3.
5.2. The Council organised five exhibitions which took place at a range of venues across Alperton at different times of day and days during the week. This was to ensure that the exhibition was accessible to a wide cross section of the community and so that as many people as possible could attend. A minimum of two officers were present at each event to answer questions; an interpreter was present at one of the exhibitions which was held on a Sunday at the Shri Sanathan Hindu Mandir.
5.3. The times and locations of the exhibitions are listed below:

Tuesday $18^{\text {th }}$ January 2011 - Alperton Community Upper School
Venue: Alperton Community Upper School, Stanley Avenue, HA0 4JE
Time: 14:00-17:00
No of people attended: 23 recorded
Wednesday $19^{\text {th }}$ January 2011 - Abbey Estate Community Centre Venue: Abbey Estate Community Centre, Queensbury Road, HAO 1NL Time: 16:00-20:00
No of people attended: 31 recorded (+ 20 unrecorded)
Thursday $20^{\text {th }}$ January 2011 - Alperton Community Lower School Venue: Alperton Community Lower School, Ealing Road, HA0 4PW Time: 17:00-20:00
No of people attended: 11 recorded

Thursday $20^{\text {th }}$ January 2011 - Heather Park Neighbourhood Watch meeting Venue: Heather Park Pub, Heather Park Drive
Time: 19:00-20:00
No of people attended: 33 recorded
Sunday $23^{\text {rd }}$ January 2011 - Shri Sanatan Hindu Mandir
Venue: Shri Sanatan Hindu Mandir, Ealing Road
Time: 10:00-13:00
No of people attended: 3 recorded (+ 6 unrecorded)
5.4. In total 127 people attended these events.
5.5. Several one to one meetings were also held with interested parties including local businesses, developer/ landowners and the headmistress at Alperton Community School. A presentation was made to the Heather Park Neighbourhood Watch group and since January 2011 a second presentation has been made updating this group on the progress of the project.
5.6. Comments and feedback on the SPD were gathered in several different ways in order to ensure that as many different members of the community could have the opportunity to give their opinions as possible.
6. Results of Questionnaire
6.1. A questionnaire was prepared and made available to be filled in online using the Planning Portal as well as being made available as hard copies at the exhibitions. A total of four people completed the online questionnaire and a further 33 completed hard copies.
6.2. The questionnaire, based on the summary document in Appendix 3, focused on firstly whether the individual agreed with the description of Alperton, the aims and ambitions of the vision and the delivery strategy and then asked the individual whether they agreed with the aims and ambitions for each character area. There was also an opportunity to choose from a list of possible projects and interventions for each character areas which they considered to be the most important.
6.3. A total of 37 questionnaires were collected, the results are summarised below:

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6.4. Alperton today - Do you agree with this description of Alperton today?

6.5. The vision - Do you agree with this vision of what Alperton could be like in the future?

6.6. Delivery - Do you agree with this approach to transforming Alperton?


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6.7. Alperton's core - Do you agree with the description?

6.8. Alperton's core - We have proposed a series of projects which new development could contribute towards which will help to make Alperton a better place to live, work and visit. Which three projects do you think are the most important?


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6.9. Waterside Residential Neighbourhood - Do you agree with the description?

6.10. Waterside Residential Neighbourhood - - We have proposed a series of projects which new development could contribute towards which will help to make Alperton a better place to live, work and visit. Which three projects do you think are the most important?


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6.11. Industrial transition zone - Do you agree with the description?

6.12. Industrial transition zone - We have proposed a series of projects which new development could contribute towards which will help to make Alperton a better place to live, work and visit. Which three projects do you think are the most important?


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## 7. Letters, e-mails and other representations:

7.1. In addition to this 26 letters and e-mails were received, two of these representing a residents association with several signatories attached and also five telephone conversations were recorded. The table below shows the division of representations received.

7.2. Of the letters and e-mails received the majority of representations have been supportive of the proposals and have provided suggestions for where the document could be improved or have raised particular issues. Only three of the representations received were entirely unsupportive of the proposal.

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7.3. In total 63 pieces of source material have been collected. Approximately 270 individual comments have been extracted from this source material and each of these have been tabulated. The table below summarises the comments received:


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7.4. Whilst the sample size was too small to carry out any statistical analysis some key issues could be identified. All comments can be found in the appendix, a summary of this is in the table below:


## 8. Council responses to representations:

8.1. The following is a summary of the key issues in the table above and the Councils response to these:

### 8.2. Social and Physical Infrastructure

8.2.1. Almost half of the representations received have said that it is important to provide sufficient additional social and physical infrastructure to support the existing growth including GPs, dentists, school places, nursery places and community facilities. Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This approach is set out in Section 4.0 and 7.3 and section 7.3 has been amended to make this intention clearer.
8.2.2. Representations received have raised concerns about the lack of open space for recreation and particularly for young people. Response: Section 7.3 - describes the councils approach to meeting open space requirements in Alperton, which includes improving existing open space and proposing locations of new open spaces which can be delivered through development. It has been noted that this section should provide more detail on how open spaces can be improved with a clear reference back to CP8 -Protection and enhancement of Open Space and the requirements of the Infrastructure Investment Framework.
8.2.3. Some representations has suggested that the masterplan should have stronger links back to Core Policy with regards to open space provision, improvements to open space, biodiversity, climate change etc Response: It is recognised that the masterplan needs to detail what open space improvements are proposed and the strategy to respond to CP8 open space infrastructure requirements, this will be covered in section 7.3. All proposals in Alperton will be expected to comply with existing SPG19 Sustainable Design and Construction, and it is recognised that the masterplan could be improved to include reference to measures specific to Alperton and climate change adaptation measures which are not as fully covered in SPG19.
8.2.4. Several comments have also been received about lack of support for the elderly and vulnerable members of the community and the need for more elderly care homes. Response: Supported housing need in the borough accommodates a wide range of client groups, which include the some of the most vulnerable people in the borough, including frail elderly people and individuals and households with multiple, complex needs. The provision of
new care and support accommodation, as well as the remodelling of existing facilities, to enable people to live more independently is a strategic priority for the borough (CP21). The extent, number and location of such housing should come out of a borough wide assessment of needs and analysis of available resources and this will inform the next version of the IIF for the Borough. No changes to the masterplan are proposed.

### 8.2.5. Concerns have been raised about the lack of public toilets

8.2.6. Concerns have been raised about the lack of post offices

### 8.3. Anti Social Behaviour (ASB)

8.3.1. Concerns about ASB including dog fouling, littering, vandalism and aggressive behaviour have been recorded. Response: While the masterplan cannot deal with every individual or particular problems related to ASB, it does provide support to ensure that in planning dwellings and neighbourhoods attention is given to planning out crime by adopting important design principles such as ensuring overlooking of spaces, providing good lines of sight and so-on. An amendment is proposed in section 4.0 to underline this important issue. It it is recognised that the council will need to work closely with other teams including SNT, parks and streetcare as the area is developed to tackle such issuesand section 11.1 has been updated to show this.

### 8.4. Conservation

8.5. Comments have been received that there should be more consideration for the historic environment. Response: The Council will expect the usual detailed analysis of the impact of development on adjacent registered heritage assets, as part of any definite development proposal. The impact on views in and out of the Conservation Area will require testing and Brent Council will require the test as a part of any Design and Access statement.

### 8.6. The Environment

8.6.1. Comments have been made that more detail is required on the impact of new development on water and waste water infrastructure. Response: Reference to potential impact of development on water and waste water infrastructure and need to demonstrate adequate capacity will be added to section 7.5.
8.6.2. Comments have been made that there should be more detail on how green and open spaces including the canal and Brent River will be protected and enhanced, also more emphasis on sustainable development and the effects

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of climate change has been requested. Response: Section 7.5 has been updated to include more guidance on sustainable development including relevant biodiversity and canal-side protection and enhancement measures which will be sought from development proposals and an additional section 7.6 has been added on Environmental Protection.

### 8.7. Housing / density

8.7.1. Some residents have raised concerns about the planned growth in the area, stating issues of overcrowding and congestion. Response: The decision to support growth in Alperton was already set out in the Core Strategy as one of the Boroughs Growth Areas. The Core Strategy (CP2) sets out the borough's plan for a sustainable population growth of 28,000 people by 2017 and the provision of at least 22,000 additional homes between 2007 and 2026. Over $85 \%$ of these new homes will be delivered in five growth areas, one of which is Alperton, where mixed use regeneration is identified as having the capacity to delivery a minimum of 1,600 new homes. The masterplan has tested the acceptability of this target, which is also informed by the LDF Site Specific Allocations. No changes are proposed to the masterplan.
8.7.2. Several comments have been recorded about the massing and density of the new homes within the masterplan and the low rise approach in the central character area- "Waterside Residential Neighbourhood". Typically comments from the existing community have expressed support for the ambition to restrict the height of new development so that it is in keeping with the existing massing and landowners and developers have expressed concerns that the proposed low rise development is too restrictive stating that the masterplan should be more flexible. Response: The council has carried out a significant amount of testing of the layouts that are illustrated in the masterplan. Proposals within the central character area aim to show how the compact and tight-knit character described in the vision can be achieved whilst being sympathetic with the surrounding building heights and maintaining the spirit of existing planning requirements. The masterplan is intended to be clear about the scale of development that the council and local community expect whilst at the same time being flexible. In response to these comments Section 4.0 and Section 9.0 has been updated to reflect some of the comments received from developer/ landowners for example it has been made clear that maps and diagrams are for illustrative purposes only and that future applications will not be held up against them to get an exact match.
8.7.3. Local residents have expressed concerns about building more high rise buildings in Alperton. Response: The masterplan actually restricts taller, higher density housing to one area at the junction of Ealing Road and the

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canal near to Alperton Station. This area is considered suitable for higher density housing as it has good public transport links and is well served by a range of local services and amenities. Further, this area is characterised by taller buildings, such as Middlesex House, the recently completed development on Atlip Road, and the permitted proposal for the B\&Q site, and therefore this form of development is considered to be in keeping with the existing built environment. No changes to the masterplan are proposed.
8.7.4. Concerns have been raised about the new development having a lack of character or contributing to the loss of character in Alperton. Response: The masterplan sets out the vision of how regeneration can transform Alperton into three distinct character areas and describes each of these areas in terms of overall feel and character, land use, building height, street hierarchy, public realm, open space improvements and housing density, types and tenure. Moreover, building upon the LDF position on the need for development to be sustainable and supported by adequate social and physical infrastructure, the masterplan details a series of interventions and projects that will support the growth in the number of people living and working in Alperton.
8.7.5. Concerns linked to concerns about viability have been recorded about the emphasis on the provision of family housing in the central character area.
Response: As suggested within the document, the proposed masterplan is one interpretation of how development could come forward in Alperton, around suggested principles of streets and connections, adjacencies, use, character and housing mix. Suggested building heights are included to further explain the suggested interpretation and show consideration of the impact on adjacent and existing dwellings. Section 4.0 has been updated to make this intention clearer.
8.7.6. Comments have been received that support the alternative option to develop part of Northfield Industrial Estate for residential use but the representation from the GLA has been very clear that they cannot support this option as the Northfield Industrial Estate remains protected by the Mayor of London as a Strategic Industrial Location. Response: The council believes that the site presents a major opportunity not only to provide additional homes but also contribute to the delivery of the essential social and physical infrastructure that Alperton needs including potentially a new open space and is disappointed that the GLA are not flexible enough to consider some enabling development to see this site come forward. Due to the specific concerns raised by the GLA however the council accepts reluctantly that any review of the site allocation will need to be completed through a Development Plan Document and so has withdrawn any reference to any alternative development option for this area. Section 10.3 has been withdrawn.

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### 8.8. Public realm, management and maintenance

8.8.1. Support for improvements to the public realm have been recorded alongside concerns that the public realm is not/ will not be maintained adequately.
Response: Public realm improvements are a central part of the proposals for Alperton, in order to create a legible and identifiable place which is pleasant and safe to walk around. The masterplan is to be read in conjunction with The Brent Placemaking Guide which sets out public realm policy and design guidelines. Contributions to the management and maintenance of open spaces will be required as part of any development proposal. Section 7.2 has been updated to reinforce the requirement to refer back to the Placemaking Guide and Section 11.1 has been update to show a commitment to working with partners and the community to improve public realm design and management and maintenance.
8.8.2 Comments have been received about the need to adequately maintain new and existing public realm and open spaces. Response: Brent Councils Placemaking Guide sets out the importance of having an adequately funded and coordinated street management and maintenance regime, all Council departments and other agencies whose actions have an impact on the public realm must adopt a philosophy of care and better design in the first instance can reduce maintenance costs in the long term. Section 7.3 has been updated to give stronger links back to the Brent Placemaking Guide and with more emphasis on management and maintenance.

### 8.9. Transport

8.9.1. Existing residents are concerned about the number of new cars which will be introduced to Alperton as a result of the new development and are concerned about increased congestion and in particular increased strain on parking in the area. Response: The proposals in the masterplan have been designed so that, using the average parking ratios set out in Section 7.4, all new cars introduced to the area can be accommodated within the growth area boundary using a combination of on and off street parking. Car clubs and car sharing will also be encouraged in new development to reduce car use. If new development has an affect on parking availability on existing streets then the introduciton of controlled parking should be considered if it is in the interest of existing residents. Some residents have suggested that a multi storey car park should be built or developments should consider underground car parking, neither of these solutions have been proposed in the masterplan as they are considered to be unviable and contrary to sustainable development and the design principles of the masterplan Section 7.4 has been updated to reinforce this approach.

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8.9.2. Concerns have been recorded about the impactof additional cars on road safety, specifically on Beresford Avenue and Mount Pleasant which is already considered to be dangerous. Response: The council has refered concerns raised about existing safety on Beresford Aveue to the Highways Department who are investigating this item. Opportunities for road and junction improvements and traffic calming if necessary will be investigated as part of the transport assessment for each individual development site.
8.9.3. Support for better public transport has been noted, in particular more bus routes and increased frequency of existing routes. Residents have advised that they would like a bus routes to link Beresford Avenue to Stonebridge Park Station. Response: As a council we have an aspiration to secure a new bus route through the Borough which will go through Alperton, linking Sainsbury in the west with Beresford Avenue and Stonebridge Park Station. The council wil continue to work closely with Transport for London to negotiate improved frequency of the 224 bus route and the potentially new bus route as the new homes are delivered and demand increases. Section 7.4 has been updated with more information on the proposed new bus route.
8.9.4. Concerns have been raised that the proposed link from Atlip Road and Woodside End could become a rat run. Response: Traffic calming and good street design including the introduction of home zones will ensure that this route does not become a rat run. No changes to the masterplan proposed.
8.9.5. Concerns have been raised about congestion caused by construction site traffic. Response: Minimising disturbance and inconvenience to the existing community caused by the construction site will be dealt with by condition with each project that gets planning permission. Site delivery times can be restricted if necessary and contractors are required to be considerate at all times through the considerate contractor scheme.

### 8.10. Viability

8.10.1. Concerns have been recorded that the proposals are unrealistic and undeliverable. Response: The masterplan sets out a broad interpretation of the vision for Alperton, including building massing that is able to deliver approximately 1600 homes, as identified within the Core Strategy. On the basis of estimations of land values, construction costs and sales values, the council is comfortable that the proposals are deliverable across medium to long term development cycles. The viability of specific proposals will be tested through the planning process having consideration for the need to deliver mixed and sustainable development, including infrastructure to support development and affordable housing.

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8.10.2. The requirement to work closely with the community during delivery stage has been recorded. Response: Section 11.1 has been update to show a commitment to working with partners and the community during delivery stage.
8.10.3. Concerns about the accuracy of the viability study have been recorded and the affordable housing targets have been recorded. Response: On the basis of availability of information, the council has a broad understanding of costs and values in the masterplan area and these are not perceived to be prohibitive. The 2009 Affordable Housing Viability Study concludes that although circumstances vary from site to site, it is appropriate for the council to maintain the $50 \%$ borough wide target and this is included within the Adopted LDF Core Strategy (2011). Development proposals that come forward will be tested for viability through the planning process having regard for a number of factors, including the deliver of affordable housing. In any case, it is not possible for the masterplan to introduce a policy that differs from the Core Strategy.

### 8.11. Waterside development

8.11.1. Support for protecting the canal and making it a more pleasant and accessible place has been recorded. Response: Section 7.3 states that a series of new green spaces will be created as well as proposing improvements to existing open spaces which are detailed in the character area chapters. It is recognised that the masterplan could usefully provide more guidance on how the canal should be protected and enhanced. Relevant biodiversity and canal-side protection and enhancement measures that will be sought from development proposals will be added to section 7.5.
8.11.2. Support for new on line and off line moorings has been recorded alongside concerns from developers and landowners about the costs involved in delivering these. Response: The masterplan promotes the installation of a range of types of additional mooring points along the canal in appropriate locations and these have been proved to be deliverable by developments on the ground. To introduce canalside character alongside new developments, the masterplan does also suggest that it may be possible to introduce inlets at appropriate locations, which may be full depth or shallow constructions. The deliverability of specific proposals (technical and financial) would need to be properly investigated through the planning process.
8.11.3. Comments have been received about the need to improve the maintenance of the canal alongside concerns from developers about how this will be funded. Response: Although British Waterways will be principally responsible for the maintenance and upkeep of the tow path, new development in this area is likely to significantly increase the numbers of

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those using such spaces. The council will work together with developer partners and statutory undertakers in order to ensure that the canal is a successful public space and reasonable contributions to public realm improvements will be sought and negotiated upon as development comes forward. No change to the masterplan is proposed.
8.12. It has been recognised that the canal could usefully be used to transport freight Response: agreed.
9. Next Steps
9.1. The Alperton Masterplan SPD has been updated as outlined above and the final draft will be presented to the Executive in July.
9.2. Consultees will be contacted after July with a summary of council responses to the representations received and an update on the SPD.
9.3. Brent Design will be preparing the SPD for publication, the document, once published will be distributed to local One Stop Shops, libraries and community hubs within Alperton, as well as all stakeholders.
9.4. The consultation has ensured even stronger links to the community in Alperton and it is very important to the success of the SPD that the Council and developers continue to work closely with the community during the delivery stage.

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Figure 1: Map of addresses which were included in mail drop - January 2011


### 1.0 Summary

1.1 The terms of reference for decision making for the Planning Committee were reviewed in their entirety by the Council in May, following an earlier report to the Planning Committee and the Constitutional Working Group. As part of the discussion by members a request was made to re-examine the way that site visits by the Planning Committee were conducted. This report sets out some options for consideration by members that will ensure a continuation of visits but with a focus on reducing the number of visits, confining attendance at the visits to members of the Committee, and looking at alternatives to the regular Saturday morning arrangements in advance of the Committee meeting. As changes would have implications for the Planning Code of Conduct, any decision to change arrangements would require a decision by the full Council.

### 2.0 Recommendations

2.1 That the Committee considers the following changes to the way site visits are carried out:
a) To only have site visits to more major developments (with residential schemes normally over 10 new dwellings);
b) To restrict attendance at site visits to members of the Committee and relevant officers, with the applicant (or their agent) in attendance to provide access and explain (when required) the scheme;
c) That consideration be given to mid-week visits.
2.2 That changes be reflected in the in the Planning Code of Conduct to be finally
agreed by the full Council.

### 3.0 Detail

3.1 The review earlier this year of the terms of Reference of the Planning Committee, contained in Part 5 of the Constitution, and the resultant reduction in the number of meetings of the Committee was driven in part by the need to secure efficiencies given the budget and staffing reductions within Planning. In discussions on changes to the terms of reference, the Constitutional Working group also requested a further report on Planning Committee site visits, being of the view that they could be reduced and confined to members of the Committee rather than include an invitation to residents who have made representations, who often misunderstand the purpose of the visit.
3.2 Site visits allow members of the Planning committee to view an application site and get a clearer understanding of the proposal and its relationship to surrounding development prior to the formal committee meeting when a decision is made. They have been a very long standing feature in Brent, and generally take place on the Saturday morning prior to the committee meeting. Interestingly, whilst site visits are conducted in other authorities, they tend to be occasional and not a regular occurrence as they are in Bren. Site visits by the Planning Committee are not a statutory requirement and are not a requirement of, or set out in the terms of reference of the Planning Committee in Part 5 of the Council's Constitution. The conduct of site visits is referred to in the Planning code of Conduct in Part 7 of the Constitution however.
3.3 Notice of site visits is currently given to the applicant (and their agent), all parties who have made representations on the application and in most cases to ward councillors. Members will be aware that the site visit is not a forum for discussion but for inspection of the site, providing parties that attend an opportunity to highlight various impacts by reference to the site. In practise, particularly on schemes where there is a high level of local interest, site visits can prove difficult to manage and those attending are often frustrated by being told that it is not a forum for debate. As a consequence the value of the public and other third parties being present is questionable, particularly given that comments received are already reflected in the report available to members.
3.4 Members of the Planning Committee have over the years expressed some concern over the burden of site visits, undertaken on a Saturday morning prior to each meeting. In the past this has discouraged some members from being on the Committee. It is therefore appropriate to examine other options, including weekday visits. This arrangement has recently been tried, and proved successful although it is accepted that there may be implications for members of the Committee who have work commitments.
3.5 Lastly there is the issue of the number of visits made. Members could take the view that visits should only occur on an occasional basis, particularly now that more pre application presentations of schemes to the Committee are being arranged. Theses presentations often involve detailed information of the site and its surroundings, and give members of the Committee advance
notice of proposals and the opportunity to raise general issues. Officers are keen to reduce the overall number of visits and to move towards providing better visual information of the site and its surroundings for individual applications that will further assist members in making informed decisions on applications.
3.6 The need to maintain the public's involvement in the planning process remains critical. However, the issue is how well this objective is served by encouraging an input at such a late stage in the process. Brent's normal public consultation arrangements exceed the statutory minimum requirements are not proposed to be changed. However, the greater emphasis on preapplication consultation, particularly for more major developments, is likely to allow a more effective process for engagement than Members site visits has proved to be.
3.6 Members are invited to express views and preferences that can be reported on to the Constitutional Working Group prior to a recommendation for change to the full Council. A copy of the current Planning Code of Practice is attached to this report.

### 4.0 Financial Implications

4.1 The Council's response to the mid year government spending reductions last year involved swift action taken to reduce spending in affected areas. This included the Planning Service where the loss of the Housing and Planning Delivery Grant left a £390k budget gap. The Executive acknowledged that staff reductions would be required and that part of the consequence of this reduction would be decision making efficiencies through changes to the delegation agreement to determine planning applications by officers. Changes to the nature of site visits and a reduction in their number will reduce overheads associated with the Planning Committee.

### 5.0 Legal Implications

5.1 The Planning Code of Practice for Members and Officers is set out in Part 7 of the Constitution. Changes to the Constitution require the agreement of Full Council.

### 6.0 Diversity Implications

6.1 It is not considered that changes to site inspections will have any adverse impact on those affected by the planning process. There is a statutory requirement to consult on most applications and representation made will still be considered prior to any decision on an application, and will be available to members prior to any site visit being made. Both applicants and parties affected by planning applications will continue to have access to planning staff and elected members, where they will be able to raise concerns. Applicants and third parties will also continue being able to address the Planning Committee prior to any Committee decision being made.

### 7.0 Staffing/Accommodation Implications (if appropriate)

7.1 Staffing levels in the Area Planning teams, where planning applications are considered, have reduced in the last four years, most recently as a result of the mid year budget reductions in 2010, with the loss of the Housing and Planning Delivery Grant. A reduction in site visits, the exclusion of third parties, and alterations to how and when they are conducted will assist in further reducing the Committee workload.

## Background Papers

Brent Constitution (as revised)

## Contact Officers

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## PLANNING CODE OF PRACTICE

## Purpose of this Code

The Planning Code of Practice has been adopted by Brent Council to regulate the performance of its planning function. Its major objectives are to guide Members and officers of the Council in dealing with planning related matters and to inform potential developers and the public generally of the standards adopted by the Council in the exercise of its planning powers. The Planning Code of Practice is, in addition to the Brent Members Code of Conduct, adopted by the Council under the provisions of the Local Government Act 2000. The purpose of the Code is to provide more detailed guidance on the standards to be applied specifically in relation to planning matters. The Code seeks to ensure that officers and members consider and decide planning matters in an open and transparent manner. The provisions of this code are designed to ensure that planning decisions are taken on proper planning grounds, are applied in a consistent and open manner and that Members of the Planning Committee making such decisions are, and are perceived as being, accountable for those decisions. The Code is also designed to assist members of the Council in dealing with and recording approaches from developers and objectors and is intended to ensure that the integrity of the decision-making process is preserved.

## General

1. Members of the Planning Committee shall determine applications in accordance with the Unitary Development Plan unless material considerations indicate otherwise. The Brent Members Code of Conduct and the law relating to Brent Council members' personal and prejudicial interests must be complied with throughout the decision making process. Decisions should not be influenced by personal or prejudicial interests of Councillors or because of undue pressure exerted by applicants, agents or third parties. This Code sets out further rules applicable to the planning process in Brent.

## Review of Code of Practice

2. The Director of Legal and Procurement is instructed to commission a report independent of the planning service once every two years on the operation of this Code of Practice. The report should address the extent of compliance with the Code by officers and members, contain an analysis of decisions being made against officers' recommendations and set out any appropriate recommendations for improvement. This report should be presented annually to the Standards Committee.

## Accountability and Interests

3. Except as provided for in paragraph 7 of this Code members of the Council should not take part in any discussion of, or vote on, any item if they or their relative, friend or associate is the applicant, agent or objector for that matter.
4. Members of the Council who have business or other interests which may bring them into contact with the Council's planning system on a regular basis should not be considered for membership of the Planning Committee.
5. Members of the Council who are consistently unable to support the Council's planning policies should not be considered by their political group for membership of the Planning Committee.
6. If the Chair decides to allow a non-member of the Committee to speak, the non-member shall state the reason for wishing to speak. Such a member shall disclose the fact that he/she has been in contact with the applicant, agent or interested party if this be the case.
7. If a member of the Council has a personal interest in any planning application or other matter before the Planning Committee, then the member shall, if present, declare a personal interest at that meeting unless the interest arises because the member is a member of or is in a position of general control or management in a body to which they were appointed or nominated to by the Council or that exercises functions of a public nature. In which case the member only needs to disclose the personal interest if they address the Planning Committee meeting on that item.
8. If a member has a personal interest in a matter and if that interest is also a prejudicial interest the member shall withdraw from the room where the meeting is being held and not take part in the discussion save that they may make representations, answer questions or give evidence in respect of the application or matter in question in so far as the public have the right to do so. A member must then withdraw from the room for the rest of that item and play no further part in it.
9. If a member of the Council has a prejudicial interest in a planning application or other matter before the Committee, he/she shall not exercise his or her discretion to require the application or other matter to be referred from officers to the Planning Committee for consideration and nor shall he/she exercise his/her right to request a site visit.
10. For the avoidance of doubt, where a member of the Council is a Freemason or a member of a similar secret society and is aware that the applicant, agent or other interested party in relation to a particular planning application is also a Freemason or a member of the same secret society, the member shall treat this as a prejudicial interest for the purposes of paragraph 8 above.
11. The Monitoring Officer shall maintain a register of contact made by applicants, agents or interested parties with individual members of the Council on each and every planning application, in which members of the Planning Committee must record approaches referred to in paragraph 17 and other members of the Council may record such approaches if they so wish.
12. If any officer of the Council who is involved in making recommendations or decisions on planning applications has had any involvement with an applicant, agent or interested party, whether or not in connection with the particular application being determined, which could possibly lead an observer with knowledge of all the relevant facts to suppose that there might be any possibility that the involvement could affect the officer's judgement in any way, then that officer shall declare a prejudicial interest in the public register held by
the Director of Regeneration and Major Projects and take no part in the decision making process. The declaration of such interest shall also be recorded in the minutes of the meeting. This public register to be available for inspection at Planning Committee meetings.
13. No officer of the Council shall engage in any paid work for any town planning matter for which Brent is the Local Planning Authority other than on behalf of the Council.
14. In relation to all matters not addressed above, all such officers shall comply with the Royal Town Planning Institute Practice Advice Note No. 5 relating to Consultancy by Current and Former Employees or any guidance replacing this.

## Call-in

## Call-in powers

15. Where under the provisions of the Constitution three members of the Council ask for an application or other matter to be decided by Committee rather than by officers, their request shall state:
(i) the reason(s) which should solely relate to matters of material planning concern why they feel the application or other matter should not be dealt with under delegated powers; and
(ii) whether or not they have been approached by any person concerning the application or other matter and if so, by whom.

This information shall then be included in the relevant Planning Committee report.

Unless the request and the necessary supporting information outlined above has been provided by both members at least one week prior to the relevant meeting then the matter shall proceed to be determined by officers in accordance with their delegated powers.

## Development proposals submitted by Councillors who sit on the Planning Committee

16. The Council's monitoring officer should be informed of such a planning application and the application should be reported to the Planning Committee and not dealt with by officers under delegated powers.

## Approaches to members of the Planning Committee

17. If an approach is made to a member of the Planning Committee from an applicant or agent or objector or other interested party in relation to a particular planning application or any matter which may give rise to a planning application, the member of the Planning Committee shall:
(i) inform the person making such an approach that such matters should be addressed to officers or to members who are not members of the Planning Committee.
(ii)
disclose the fact and nature of such an approach at any meeting of the Planning Committee where the planning application or matter in question is considered; and
(iii) record the approach in the register maintained by the Monitoring Officer under paragraph 11.

For the avoidance of any doubt, if the applicant, agent or objector or other interested party attend and/or speak at a Council organised briefing for members of the Planning Committee then that briefing does not constitute an approach which has to be registered with the Monitoring Officer or disclosed under (ii).
18. Where a planning application is to be determined under delegated powers Councillors should not put improper pressure on officers for a particular recommendation or do anything which compromises, or is likely to compromise the officer's impartiality.

## Site Visits

19. Save as provided by paragraph 9 above, if three members of the Council request a site visit prior to a meeting of the Planning Committee at which the application in respect of the request is to be considered, they shall provide the following details at least two weeks before the date of the meeting at which the application is to be considered and a record shall be kept of those details:
(i) their name;
(ii) the reason for the request; and
(iii) whether or not they have been approached concerning the application or other matter and if so, by whom.

If the details are not provided then the site visit shall not proceed. Alternatively, during any meeting of the Planning Committee, any member of the Planning Committee may request a site visit in respect of any application on the agenda of the meeting. The member must give the reason for the request.
20. The purpose of a site visit is to gain information relating to the land or buildings which are the subject of the planning application or other matter to be considered by the Planning Committee. A site visit may also assist members of the Planning Committee in matters relating to the context of the application or other matter in relation to the characteristics of the surrounding area. Members attending the site visit should avoid expressing opinions on site visits to any person present.
21. Members of Planning Committee shall not enter any premises which are the subject of a planning application or other matter or known by them to be likely to become such in order to meet the agent, applicant or other interested party, save in the course of a formal accompanied site visit. In exceptional circumstances such as where a member of the Planning Committee is unable to attend the official site visit that has been arranged, a site visit by an individual member may be carried out provided that the member is accompanied by a planning officer.
22. On site visits applicants or other interested parties shall only be permitted to point out to those members of the Planning Committee attending the site visit the features to look at either on the site or in the vicinity, which are relevant to the application or other matter. No discussion will take place on the merits of the application or other matter.
23. Whilst on site visits, members of Planning Committee shall keep together as a group and shall not engage individually in discussion with applicants or objectors.

## Membership and Jurisdiction of the Planning Committee

24. When the membership of the Planning Committee is determined, care shall be taken to ensure that for each Ward there is always at least one Councillor who is not a member of Planning Committee. This is so that there will always be a Councillor who is not a member of the Planning Committee with whom residents will be able to discuss planning matters.
25. Any briefings which may be held prior to the Planning Committee meetings shall be open to all members (and alternates) of the Planning Committee. These briefings can help to speed up decision making by giving officers notice of additional information members of the Planning Committee may require at the meeting.
26. All members of Planning Committee, and in particular the Chair, shall be informed from time to time about the relevant provisions concerning access to information contained in the Local Government Act 1972 and in the event of any dispute between members of the Planning Committee and officers as to the application of the 1985 Act, the advice of the Director of Legal and Procurement or his or her representative shall be obtained forthwith.

## Meetings of the Planning Committee

27. No material revision to any planning application which might lead to a change in the recommendation of officers shall be considered at Planning Committee unless it has been submitted such reasonable period in advance of the relevant Planning Committee meeting as is agreed by the Assistant Director of Planning and Development and has been the subject of a full appraisal by officers and consultation where necessary and that the minutes shall record the fact that revisions have been made to the application and the reasons for these shall be recorded in the supplementary information.
28. If the Planning Committee wishes to grant planning permission contrary to officers' recommendations the application shall be deferred to the next meeting of the Committee for further consideration. Following a resolution of "minded to grant contrary to the officers' recommendation", the Chair shall put to the meeting for approval a statement of why the officers recommendation for refusal should be overturned, which, when approved, shall then be formally recorded in the minutes. When a planning application has been deferred, following a resolution of "minded to grant contrary to the officers' recommendation", then at the subsequent meeting the responsible officer shall have the opportunity to respond both in a further written report and orally to the reasons formulated by the Committee for granting permission. If the Planning Committee is still of the same view, then it shall again consider its reasons for granting permission, and a summary of the planning reasons for that decision
shall be given, which reasons shall then be formally recorded in the minutes of the meeting.
29. When the Planning Committee vote to refuse an application contrary to the recommendation of officers, the Chair shall put to the meeting for approval a statement of the planning reasons for refusal of the application, which if approved shall be entered into the minutes of that meeting. Where the reason for refusal proposed by the Chair is not approved by the meeting, or where in the Chair's view it is not then possible to formulate planning reasons for refusal, the application shall be deferred for further consideration at the next meeting of the Committee. At the next meeting of the Committee the application shall be accompanied by a further written report from officers, in which the officers shall advise on possible planning reasons for refusal and the evidence that would be available to substantiate those reasons. If the Committee is still of the same view then it shall again consider its reasons for refusing permission which shall be recorded in the minutes of the meeting.
30. Members of the Planning Committee shall refrain from personal abuse and party political considerations shall play no part in their deliberations. Members of the Planning Committee shall be respectful to the Chair and to each other and to officers and members of the public including applicants, their agents and objectors and shall not bully any person. Members of the Planning Committee should not make up their mind before hearing and considering all relevant information at the meeting and should not declare in advance of the meeting, how they intend to vote on a particular application or other matter.
31. Members of the Planning Committee should not speak to members of the public (including applicants and agents) during a meeting of the Planning Committee or immediately prior to or after the meeting concerned, other than where permitted by this Code or Standing Orders.
32. When questioning members of the public or the applicant who have spoken at a meeting of the Committee, members of the Planning Committee shall ensure that their questions relate only to planning matters relevant to the particular application.
33. The minutes of the Planning Committee shall record the names of those voting in favour, against or abstaining:
(i) on any resolution of "Minded to grant or minded to refuse contrary to Officers Recommendation";
(ii) on any approval or refusal of an application referred to a subsequent meeting following such a resolution.
34. A member of the Planning Committee shall not vote in relation to any planning matter unless he or she has been present in the meeting of the Planning Committee throughout the consideration of that particular matter as required by Standing Orders. Any dispute as to whether the member of the Planning Committee in question should be permitted to vote shall be decided by the Chair having taken appropriate advice from legal or other officers present.
35. Unless all members of the Planning Committee indicate that they intend to vote in accordance with the officers' recommendation on a particular item, the responsible officer shall be allowed time, at the beginning of the consideration of each application, to summarise his or her advice. If after discussion it
appears that any member of the Planning Committee is minded to vote contrary to the officers' recommendation, the officer shall be allowed a further opportunity to respond to new points which have been raised, and to address the implications of a contrary decision.

## Member and Officer Relations

36. Any criticism by members of Planning Committee of officers in relation to the handling of any planning matter shall be made in writing to the Director of Regeneration and Major Projects and not to the officer concerned. No such criticism shall be raised in public.
37. If any officer feels or suspects that pressure is being exerted upon him or her by any member of the Council in relation to any particular planning matter, he or she shall forthwith notify the matter in writing to the Director of Regeneration and Major Projects.
38. Members of Planning Committee shall not attempt in any way to influence the terms of the officers' report or recommendation upon any planning matter.

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[^0]:    Chris Walker
    Assistant Director, Planning \& Development

[^1]:    Meeting Planning Committee
    Date July $12{ }^{\text {th }} 2011$

[^2]:    Brent Council - The Executive 18 July 2011
    ALPERTON MASTERPLAN SPD Appendix 3

    Table of consultation comments

[^3]:    Table of consultation comments

[^4]:    Brent Council - The Executive 18 July 2011 Appendix 3

    Table of consultation comments

[^5]:    Table of consultation comments

