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

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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 5th January 2011 and closed on 25th 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 <u>www.brent.gov.uk/alperton</u> 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 18th 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 19th January 2011 – Abbey Estate Community Centre Venue: Abbey Estate Community Centre, Queensbury Road, HA0 1NL

Time: 16:00 - 20:00

No of people attended: 31 recorded (+ 20 unrecorded)

Thursday 20th 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

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Thursday 20th 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 23rd January 2011 – Shri Sanatan Hindu Mandir

Venue: Shri Sanatan Hindu Mandir, Ealing Road

Time: 10:00 - 13:00

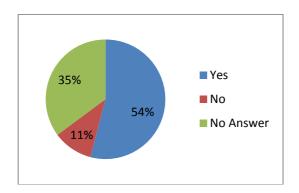
No of people attended: 3 recorded (+ 6 unrecorded)

- 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.

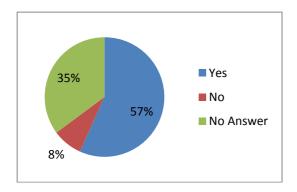
6. Results of Questionnaire

- 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:

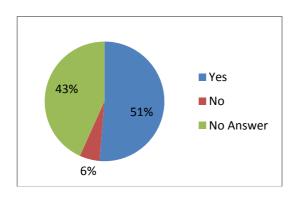
6.4. Alperton today - Do you agree with this description of Alperton today?



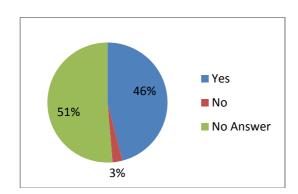
6.5. The vision - Do you agree with this vision of what Alperton could be like in the future?



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

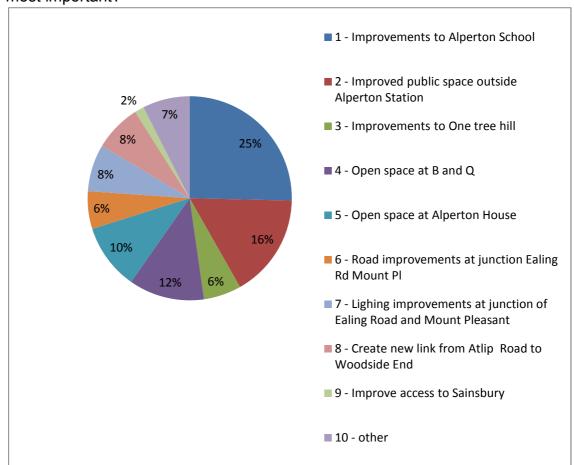


6.7. Alperton's core - Do you agree with the description?

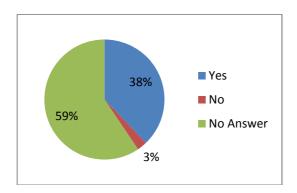


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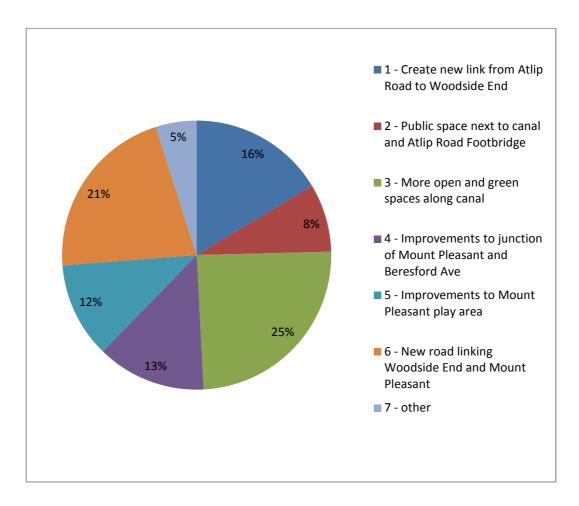
6.8. Alperton's core – We have proposed a series of projects which new development could contribute towards which will help to make Alperton a better place to live, work and visit. Which three projects do you think are the most important?



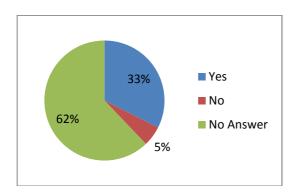
6.9. Waterside Residential Neighbourhood - Do you agree with the description?



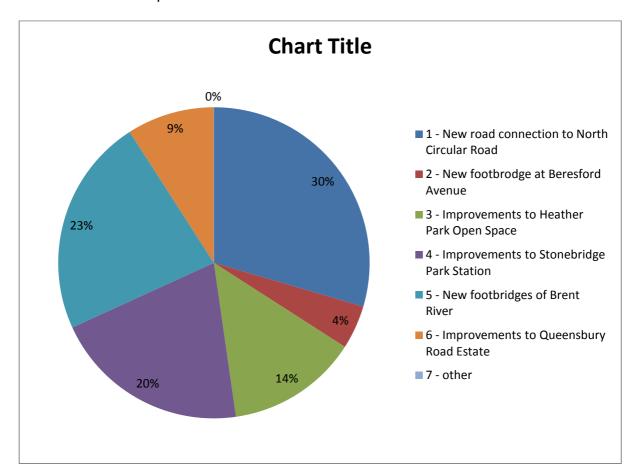
6.10. Waterside Residential Neighbourhood – – We have proposed a series of projects which new development could contribute towards which will help to make Alperton a better place to live, work and visit. Which three projects do you think are the most important?



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

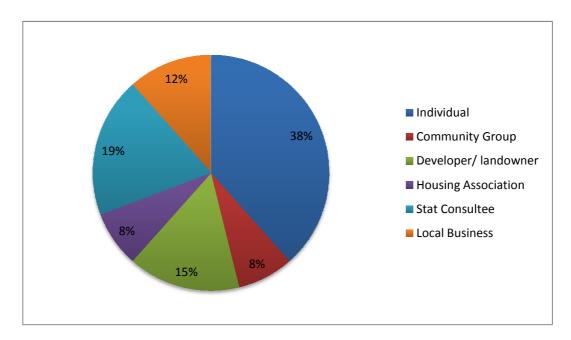


6.12. Industrial transition zone – We have proposed a series of projects which new development could contribute towards which will help to make Alperton a better place to live, work and visit. Which three projects do you think are the most important?



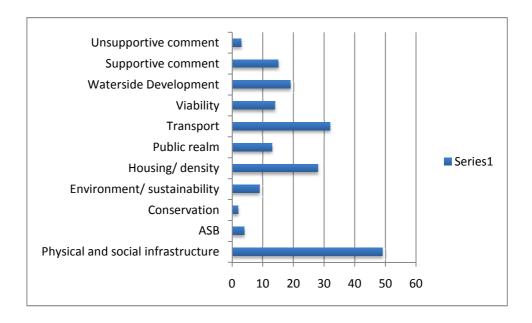
7. Letters, e-mails and other representations:

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.

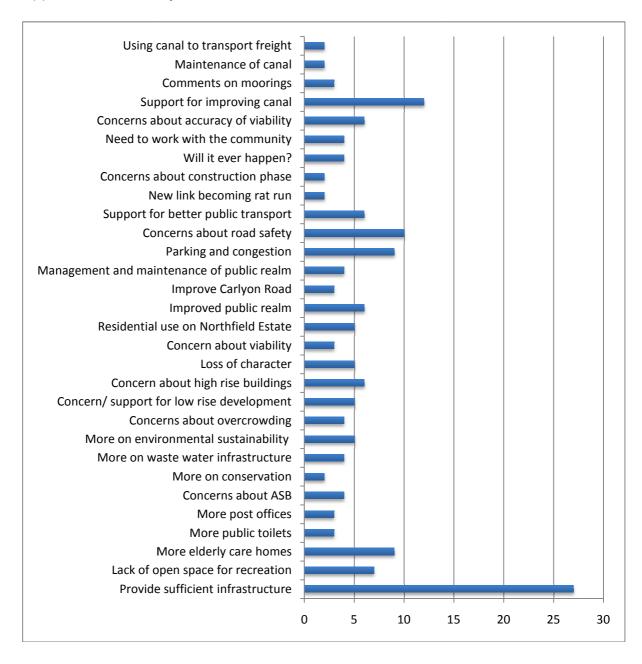


7.2. Of the letters and e-mails received the majority of representations have been supportive of the proposals and have provided suggestions for where the document could be improved or have raised particular issues. Only three of the representations received were entirely unsupportive of the proposal.

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:



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

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

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.

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.

- 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.



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