



# **BREAKSPEAR ROAD SOUTH, ICKENHAM**

**Statement of Community Involvement**

September 2022

# CONTENTS

## **1.0 Introduction**

- 1.1. Introduction
- 1.2 The Consultation Process and Objectives
- 1.3 Discussions with the London Borough of Hillingdon

## **2.0 Background and Approach**

- 2.1 Policy Framework
- 2.2 Planning Description of Development
- 2.3 Summary of the Proposed Development

## **3.0 The Consultation Process**

- 3.1 Aims of Consultation
- 3.2 Consultation Process
- 3.3 Consultation Area
- 3.4 Project Contact and Communications Channels
- 3.5 Consultation – Levels of Engagement

## **4.0 Feedback**

- 4.1 Introduction
- 4.2 Initial Stakeholder Meetings & Feedback
- 4.3 Community Feedback
- 4.4 Responding to Consultation
- 4.5 Summary of Responses

## **5.0 Conclusion**

- 5.1 Summary
- 5.2 Continued Engagement

## **6.0 Appendices**

# APPENDICES

<b>Appendix A</b>	<b>Letter distribution area</b>
<b>Appendix B</b>	<b>Consultation letter</b>
<b>Appendix C</b>	<b>Consultation website</b>
<b>Appendix D</b>	<b>Stakeholder presentation</b>
<b>Appendix E</b>	<b>Responses to frequently asked questions</b>



# 1.0 INTRODUCTION

## 1.1 Introduction

This Statement of Community Involvement has been prepared in support of an application for planning permission (the ‘Application’) for a development at the former MSD facility on Breakspear Road South (the ‘Site’). The scheme is being brought forward Keltbray Development Limited (the ‘Applicant’) and the proposed description of the development is:

*“Retention and demolition of existing buildings, construction of new buildings, all within Use Class B8 with ancillary uses, hardstanding, widening of vehicular access off Breakspear Road South, associated car and cycle parking, enhanced landscaping and ancillary works.”*

A comprehensive description of the proposals can be found in the Design and Access Statement accompanying this submission.

This report details the public consultation carried out to date in order to inform the design evolution of the proposals. Consultation has been carried out in accordance with national and local policies, as is laid out in Section 2.0 of this report. The consultation took place between June and September 2022.

Concilio is a communications agency that specialises in political and stakeholder engagement in support of the built environment. Concilio has managed the communications programme, ensuring robust and in-depth engagement can take place.

## 1.2 The Consultation Process and Objectives:

Concilio was appointed in May 2022 to perform a comprehensive community consultation and to manage pre-application consultation with neighbouring residents and occupiers as well as interested stakeholders concerning proposals for the Application.

The Applicant felt that the local community and other key stakeholders should be engaged in order to gain valuable feedback regarding the site and their view on emerging proposals, so that these could then be considered when developing the proposals. The Applicant therefore implemented a comprehensive programme of community engagement which began in June 2022 and included the following:

### Digital Consultation Website

A digital website was created and has been live since 27<sup>th</sup> June 2022. The website ([www.breakspearroadsouth.co.uk](http://www.breakspearroadsouth.co.uk)) has remained live so the project team can continue to receive comments and take these into consideration when evolving the proposals.

### Engagement with locally elected representatives

From the outset, the Applicant sought to engage with the site’s ward members from Westminster City Council (St James’s).

### Engagement with interested community stakeholders

From the outset, the Applicant sought to engage with the site's ward members from Hillingdon Council (Ickenham & South Harefield): Cllr Eddie Lavery, Cllr Martin Goddard and Cllr Kaushik Banerjee.

#### **Direct liaison with residents and businesses**

The Applicant ensured that members of the project team were able to discuss the plans with residents and businesses who wished to be involved in the application process. This was achieved through the targeted delivery of a letter to an area of just over 800 addresses in close proximity to the site, which directed people to the online consultation. A freephone number issued to residents within the consultation letter to ensure those without internet access could still provide comments.

#### **Engagement with interested community stakeholder**

The Applicant sought to widely engage with key stakeholders in the area, identified through research at the start of the project. The Applicant has conducted briefings that took the form of a presentation from the project team followed by a question-and-answer sessions with ward councillors and a local community group, the Ickenham Residents Association.

The Applicant has sought to involve the local community and stakeholders extensively.

This process is in addition to ongoing correspondence and communication with the London Borough of Hillingdon as part of the formal pre-application process. Further information is on page 7.

### **1.3 Engagement with the London Borough of Hillingdon**

*Pre-app meetings to be included.*

# 2.0 POLICY FRAMEWORK

## 2.1 Policy Framework

There is no statutory requirement to involve the community at the pre-application stage of planning proposals. However, planning policy at every level strongly encourages pre-application engagement with the community on proposals for significant developments. The engagement strategy has therefore been designed to meet the requirements for consultation as laid out in the National Planning Policy Framework (NPPF) (July 2021), Planning Practice Guidance and the London Borough of Hillingdon's Statement of Community Involvement (November 2021).

The legislative framework for enhanced public engagement is presented through the Planning and Compulsory Purchase Act 2004 and within national planning guidance as set out in the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG).

The NPPF (2021) encourages positive community engagement between all parties involved and affected by development proposals. Specifically, the NPPF states (at paragraph 40) that, "Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community."

The London Borough of Hillingdon's Statement of Community Involvement (SCI) was adopted in October 2021. The SCI was prepared to replace the previously-adopted SCI from 2006, to take account of updated consultation methods and legislative policy changes.

The SCI makes clear that: "There are clear benefits of involving the community in developments which are considered likely to have an impact on the community, and the most effective time to involve the community is at the pre-application stage.

At this point in the development process, information and views gained from the community can still have a meaningful impact on the final shape the development takes. It will also assist in resolving any objections and conflicts prior to a formal application being submitted. The people involved and the level of engagement needs to be proportionate to the nature and scale of a proposed development."

The engagement strategy devised and implemented by Concilio and the Applicant has been designed to meet the requirements for consultation and engagement as laid out in the NPPF and the London Borough of Hillingdon's Statement of Community Involvement.

This Statement is submitted to set out the type of community involvement undertaken, the views expressed and the changes made to proposals, in accordance with London Borough of Hillingdon's expectation.

## **2.2 Planning Description**

*"Retention and demolition of existing buildings, construction of new buildings, all within Use Class B8 with ancillary uses, hardstanding, widening of vehicular access off Breakspear Road South, associated car and cycle parking, enhanced landscaping and ancillary works."*

## **2.3 Summary of Proposals**

In summary, the proposals will:

- Maintain the openness of the green belt;
- Provide much-needed industrial floorspace within this area of Hillingdon;
- Re-use a previously developed site for employment use;
- Enhance biodiversity through wildflower planting and ponds;
- Include bullet point on Solar Panels on roofs;
- Support the existing woodlands with new native trees and shrubs;
- Employ high-quality sustainability initiatives; and
- Create a new, unique drainage strategy for the site.

# 3.0 THE CONSULTATION PROCESS

## 3.1 Aims of Consultation

The Applicant was keen to ensure the consultation strategy put in place delivered a series of key aims to assist with the evolution and development of the proposals:

- To raise awareness of the emerging proposals for the redevelopment of the Site and discuss the public benefits;
- To undertake consultation to ensure feedback could be incorporated into the final proposals;
- To build a relationship with the local community;
- To enable constructive dialogue between local stakeholders, the community, the project team and The Applicant;
- To ensure everyone who wanted to take part in the consultation was able to by being accessible and inclusive.

## 3.2 Consultation Process

The consultation strategy and process that Concilio has undertaken in relation to the Application has been developed with both local policy and the above aims in mind. Specifically, the consultation process has:

- Conducted an engagement programme that is appropriate for the local community and key stakeholders;
- Conducted consultation consisting of individual meetings with key stakeholders and a consultation website with options to provide feedback;
- Ensured the consultation was well publicised through the delivery of the consultation letters via the Royal Mail;
- Analysed the results from the consultation objectively;
- Publicised collective responses with due regard to the Data Protection Act and General Data Protection Regulation (GDPR) requirements.

## 3.3 Consultation Area

A consultation area was identified to reflect the scale of the proposed redevelopment proposals. The consultation area consisted of 818 addresses, comprising local residents and businesses around the site.

A copy of the distribution area is included in [Appendix A](#).

## 3.4 Project Contact and Communications Channels

A link for the consultation website and details of the webinar and in-person exhibition were provided in the consultation letter. The letter also included a freephone number and e-mail address. The freephone number was provided so those who did not have access to the internet could still engage with the consultation, and four chose to do so.

The consultation letter was distributed to the local area via the Royal Mail to ensure delivery.

A telephone number and e-mail address were publicised to ensure that information and questions could be managed from one place and there was a single point of contact for residents.

A consultation website formed the ‘consultation hub’ containing exhibition boards with information about the Application. The consultation website had an open-comments box to allow visitors to the website to ask questions to the project team and give any feedback on the proposals.

The consultation website sought the views of local residents to gather meaningful feedback from the local community. This was complemented by an interactive public webinar and in-person exhibition.

**Appendix B** is a copy of the consultation letter

**Appendix C** contains screenshots of the consultation website

### **3.5 Consultation – Levels of Engagement**

As part of the consultation several meetings were arranged with key stakeholders.

Date	Stakeholder	Location
21st June 2022	Cllr Eddie Lavery	Virtual
9 <sup>th</sup> September 2022	Ickenham Residents Association	Virtual
28 <sup>th</sup> September 2022	Cllr Eddie Lavery	Virtual

#### **Raising Awareness**

Neighbours were offered the opportunity to leave their feedback via an open comments box. This has been available since 27<sup>th</sup> June 2022 and the project team continues to accept feedback to help inform the evolution of proposals. The consultation was advertised via a Royal Mail letter drop to 818 addresses in the vicinity of the site

# 4.0

# FEEDBACK

## 4.1 Introduction

The consultation on the proposals for the Application took place between June and September 2022.

As outlined above, this involved a range of meetings with key stakeholders, a consultation website, and an open comments box where people could leave feedback.

The sections below outline the feedback received throughout the consultation.

## 4.2 Initial Stakeholder Meetings & Feedback

Engagement began shortly after conversations had taken place with officers at the London Borough of Hillingdon and involved important local stakeholders.

The Applicant took the decision to meet Cllr Lavery a second time after the proposals had evolved, to share where updates had been made in response to feedback both from officers and the local community.

Ahead of the wider consultation events, four meetings were held with political and community stakeholders identified in the previous section. The format of these meetings involved a presentation from the project team and an open Q&A session to understand initial views and opinions.

Below are the following points that were raised in discussion with stakeholders:

- Drainage;
- Transport – Impact on traffic;
- Landscaping;
- Site boundary; and
- Job creation and opportunities.

## 4.3 Community Feedback

Overall, 1,911 people viewed the consultation website throughout the period of 27<sup>th</sup> June 2022 to 26<sup>th</sup> September 2022.

The comments received via the open comments box on the website can be grouped into the following categories:

- Job provision on site;
- Anticipated traffic flow;
- Types of industry that will occupy the buildings; and
- Greening and sustainable strategies being proposed.

A full list of responses can be viewed below.

Feedback responses
Explanation of this extra road structure you are planning and what sort of job opportunities are you proposing
More detail needed regarding the positive claims of this development ie enhancing biodiversity, maintaining green belt, new drainage, supporting woodland.
Yes, what is actually being built? Office space or something else?
will there be any noise restriction on the type of industry who will populate these units?
What activity will be carried out on the site? What mitigations would be put in place to account for the traffic increase? How long will the development of the site take? What will the impact on the community be during the development?
I want to see detailed information on what you are proposing.
Please provide a detailed plan of the development, key to the various proposed functions and a description of the intended development
Please make an informative presentation with a meaningful plan and keyt [sic] indicatinbg [sic] the development aspirations
When is work on the site expected to started? What type of work will be carried out on the site, re noise and air pollution.
Yes. We are very concerned about the amount of lorries/cars that will be added to the already heavy traffic due to hs2. Also not very clear exactly what the site is going to be used for
One might assume the development is HS2 related given its proximity to the line. Beyond that other engineering infrastructure projects. Is the industrial space for manufacturing of structures? If so, what will the impact be on traffic on Breakspear Road South due to deliveries on and off site? Will there be noise or lighting from the site that could impact residential properties?
The letter and website is rather vague. What is actually being built please?
As long as there is no expansion of the existing boundary
Very limited information on the proposals. On the information available, a significant further development of the site, compared to the current site. A significant increase in traffic in an area already blighted by HS2 traffic. Initial reaction would therefore not be supportive of this development.
The information on your website does not tell us anything. What exactly are you proposing to do on this site?
A meaningless plan not providing any information on the proposed development
Shows me nothing and informs me of nothing - waste of presentation opportunity
How many local jobs? How many "smaller" HGV's each day!.

## **4.4 Responding to Consultation**

The project team has sought to answer questions raised by the public on the website by adding an FAQs page. The website has been updated several times throughout the engagement period to ensure the latest information was included. During the first round the updates, FAQs were included on the website, which can be viewed in Appendix E. A second round of changes included new visualisations of how the site might look.

Following a meeting with the Ickenham Residents Association, a request was made to have printed copies of the website sent to the Ickenham Library for those who were unable to access the internet, which they project team met.

## **4.5 Summary of Responses**

Overall, the feedback gathered from the consultation was useful for the project team in thinking about the evolution of the proposals and in establishing relationships with the local community. Keltbray, the Applicant, is keen to establish themselves as a long-term partner of the community, and has gathered views to improve the proposals where possible.

The consultation made clear that landscaping, sustainability, drainage and transport implications are important considerations for the local community. Consideration of these has been at the forefront of the proposals, and every effort has been made to ensure that comments raised in relation to these areas have been addressed.

# 5.0 CONCLUSION

## 5.1 Summary

Throughout this consultation, the Applicant has effectively engaged with a wide range of stakeholders, including locally elected politicians, community groups, and local residents. The Applicant's consultation has prioritised an open approach to engagement, genuinely seeking to understand the views of the local community and establish close relationships.

Those who engaged with the proposals welcomed the fact that the buildings would be of the same level of density as those currently on site. The principle of reusing the site was also encouraged, and stakeholders were pleased to see that the Applicant would not be building up to the site boundary but would use the space for landscaping and planting.

There were concerns raised about the possibility of disruption during construction, as well as the potential for increased levels of traffic along Breakspear Road South. Some noted that there are limited public transport options near the site and that new employees might drive to the site instead.

All comments raised have been addressed either via meetings with local stakeholders or via the changes made to the project website.

## 5.2 Continued Engagement

Throughout the consultation process, the Applicant has been clear in their intention to create genuine dialogue and relationships with the local community.

The Applicant will ensure that the submission of the Application does not mark the end of community engagement and will continue to discuss the proposals with the local community throughout the planning process. The contact details remain on the website and the team will respond to any enquiries received.

Once the application has been validated, there will be a period of six weeks where those who are interested can visit the planning portal to view all of the documents submitted as part of the application. There will also be an option for residents to submit comments to the Council that will be taken into consideration ahead of the planning committee.

# **6.0**

# **APPENDICES**