

HARLESDEN NEIGHBOURHOOD PLAN

2019 - 2034

May 2019



*Images in this document produced by Harlesden Neighbourhood Hood Forum
unless otherwise stated.*

*With thanks to Crisis Brent Community Researcher volunteers and photography group, as well as
to our Forum members, local volunteers and all those who have contributed to the preparation
of this document.*

A welcome from the Chair of the Harlesden Neighbourhood Forum

Welcome to the Harlesden Neighbourhood Plan - a vision of how Harlesden can develop and grow over the next fifteen years whilst preserving its distinct heritage.

Policies within the Neighbourhood Plan are restricted to matters amenable to planning – primarily the built, physical environment. The Plan's remit does not extend to local services, cultural and arts activities or economic development, although of course planning policies can contribute to the protection and growth of all these things. Harlesden Neighbourhood Forum's ambitions for our area however go far beyond planning policy. We hope you will continue to engage with the development of the Plan and work of the Forum throughout the formal process and beyond.

Beyond the Plan we are keen to develop an exciting and unique offer for visitors and residents alike based on Harlesden's cultural and artistic diversity.

Harlesden is a colourful, neighbourhood in north west London, home to people from across the world, where you can sample a dizzying range of cultures and cuisines from Brazilian to Polish, Trinidadian to Somali. Where, in a single visit, you can pop into some of the best Caribbean food stores in London, admire the beauty and history of Harlesden's churches or enjoy the outdoors in beautiful Roundwood Park or one of our newly regenerated pocket parks.

Over the decades Harlesden has changed from a quiet suburban village to a bustling town centre, home to successive generations of people settling in London. From the 1950s onwards Irish and Caribbean people made their home in Harlesden and today the area welcomes growing West-African, Brazilian, Portuguese, Central and Southern European and Somali communities.

Whilst Harlesden Neighbourhood Forum celebrates Harlesden's heritage and achievements, we recognise that in the current context many of our residents are struggling with issues affecting people across London, such as increasing living costs, access to decent employment and housing and protecting the individuality and diversity of the neighbourhood in the face of large-scale new developments.

Our heartfelt desire to preserve the best of Harlesden for future generations, and to encourage change and development that genuinely benefit all members of the community, has led us to develop this Neighbourhood Plan for the area. The Neighbourhood Plan offers a fifteen-year vision for Harlesden that attempts to address head on the challenges and opportunities that we face.

For us, successful implementation of the Neighbourhood Plan means that as you move around Harlesden, whether you live or work here, you will see a welcoming area: well-maintained streets that encourage people to walk and be part of the community; buildings that retain and present Harlesden's heritage and history; a diversity of shops,

cafes and other services that draw on Harlesden's character and provide local jobs to boost the economy.

What's on offer for people to do and buy on the high street and throughout the area evolves as the community and the area does; but there is something for all ages and interests.

Not only do people feel Harlesden meets their consumer and lifestyle needs, but people from surrounding areas are drawn to it too. There are pleasant green spaces dotted throughout, with local community groups taking ownership and pride in what's on their doorstep. Affordable housing is well designed and blends in throughout the area, so there is always a resilient mix and no part becomes a focus for deprivation.

If this vision becomes reality, Harlesden will be a thriving community packed with potential. However, we will continue to need the community's support and input. To get in touch, please contact us at info@HarlesdenNeighbourhoodForum.com.

Rev. Leao Neto

Chair of Harlesden Neighbourhood Forum



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1. INTRODUCTION

- 1.1. The Harlesden Neighbourhood Plan Area (or Neighbourhood Forum boundary) is part of suburban London based on Harlesden town centre with its residential hinterland as shown below. The Area is almost wholly within the London Borough of Brent but small parts are also in the boroughs of Ealing and Hammersmith & Fulham. The local planning authority for most of the Area is Brent Council, although a small part of the Area to the south is the responsibility of the Old Oak and Park Royal Development Corporation (OPDC), this includes Willesden Junction Station.

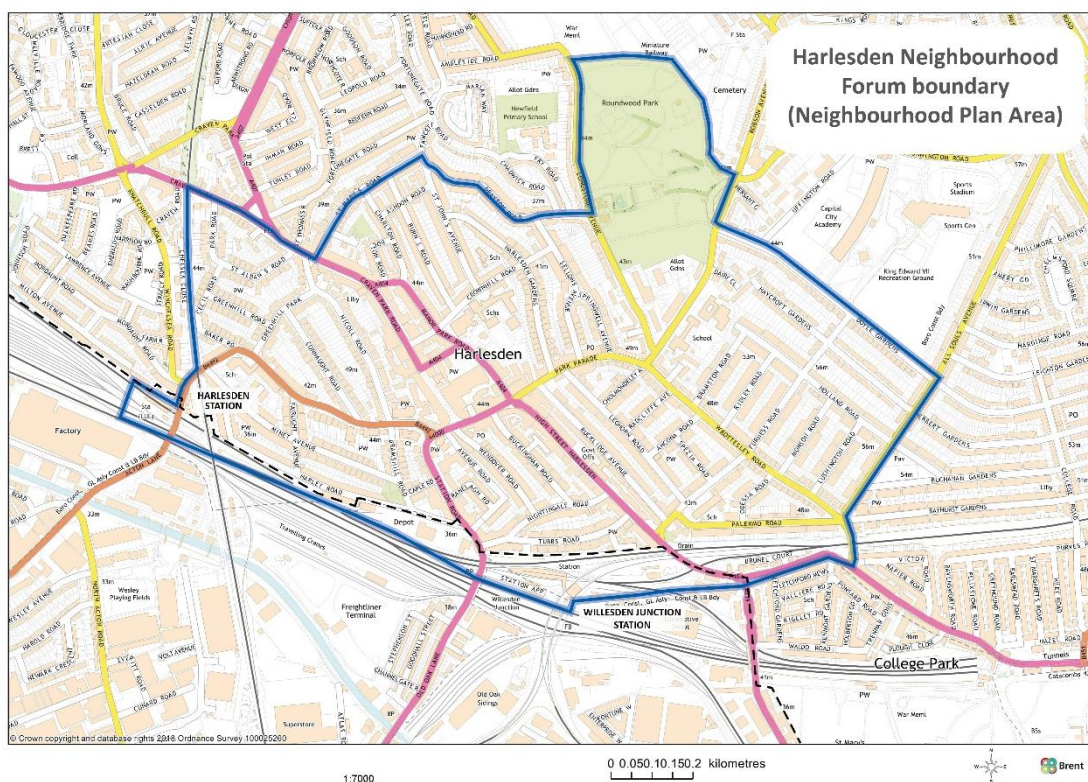


Fig.1 Harlesden Neighbourhood Forum boundary & Neighbourhood Plan Area, OPDC area beneath dashed line (Please see Appendix B for a larger image)

What is a Neighbourhood Plan?

- 1.2. Neighbourhood planning is a right for communities introduced through the Localism Act 2011.¹ Communities can shape development in their areas through the production of Neighbourhood Development Plans. Neighbourhood Development Plans become part of the local authority's Local Plan and the policies contained within them are then used in the determination of planning applications.
- 1.3. This Neighbourhood Development Plan (also referred to as the Plan) for Harlesden belongs to the whole community and as such comments and queries are welcomed on any aspect of the Plan. There is a glossary at the end of this document that explains some of the technical terminology used in the Plan (Please see Appendix A.)

¹ <http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted> accessed April 2019

Why Harlesden needs a Neighbourhood Plan

- 1.4. Harlesden has a vibrant town centre with a wide variety of shops and cafes catering to its many local communities, stately Victorian architecture, pocket parks providing oases of green space and a growing population. However, in planning terms, Harlesden has experienced a long period of decline. Despite government funded initiatives over the years to improve and regenerate the area, it continues to display characteristics of an inner-city area that has seen better times. For example, it has high levels of deprivation, including relatively high levels of unemployment, high levels of homelessness and overcrowding, and low incomes. It is a very densely developed area whose population increased substantially (by 50%) between 2001 and 2011 to reach 18,900. Although it is doubtful that this rate of growth will be maintained, population projections for London show a growth of 23% for the whole of London between 2011 and 2031, meaning that there will continue to be huge pressure on resources, especially housing and land, for the foreseeable future.
- 1.5. At the same time, there are signs that parts of the area are becoming more prosperous. The housing stock is generally good and the town centre has recently been improved with the implementation of a new road scheme, including the implementation of a shared surface for part of the High Street and the refurbishment of the Jubilee Clock. There is potential for further improvement in the town centre based on Harlesden's rich heritage in the arts and as a shopping destination for numerous communities. Harlesden can also benefit from the regeneration at Old Oak which will bring major improvements to access as well as significant regenerative investment to the surrounding area, particularly to the south of Willesden Junction station.
- 1.6. The Neighbourhood Plan can promote the type of development that is important to meet the needs of the community, including housing, community facilities, business space, retail and leisure. The Harlesden Neighbourhood Plan sets out a vision of how Harlesden should develop over the next 15 years.

Who has prepared the Plan?

- 1.7. Harlesden has a local community united in its desire to improve the fortunes of local people and the area. The Neighbourhood Forum, which was set up primarily to deliver a Neighbourhood Plan, builds on a recent history of community action. The Harlesden Town Team was set up in 2010 to improve the town centre, ensuring that the local community's voice is heard on matters relating to the town centre. Also, important locally is Crisis Skylight Brent, part of the national homelessness charity Crisis, which has offered coordination support to the Neighbourhood Forum. It is intended that the Plan will guide change locally to create a balanced and vibrant area and community.

How the draft Plan was produced

- 1.8. A steering group was set up in October 2014 to establish a Neighbourhood Forum and draw up the Neighbourhood Plan Area by consulting in the local area on a boundary and a constitution for the Forum. The Forum was formally launched in April 2015. The designation of Harlesden Neighbourhood Forum and Neighbourhood Plan Area was approved by Brent Council in August 2015 and by the OPDC in November 2015. The inaugural committee was elected (and subsequent committees elected annually) to oversee the development of the Plan.

- 1.9. It is the Committee which has been primarily responsible for producing the Plan, informed and advised through an extensive program of consultation and engagement. A full record of how the Forum engaged and consulted with local people, statutory bodies and stakeholders in the development of the Plan is laid out in the accompanying document ‘Statement of Consultation’².
- 1.10. To drive the work forward, a number of topic working groups were set up, comprising Committee members as well as other Forum members with a particular interest in the topic. These groups explored the Plan topics in some depth and reported back to the Committee and the main Forum. Supporting evidence was gathered and local planning issues, which were often intertwined with social issues experienced in Harlesden, were identified and discussed at Forum meetings. Through this process individual chapters of the Plan were produced.

The Neighbourhood Planning process

- 1.11. The first draft Plan was subject to statutory pre-submission consultation with the public in April-May 2017 and was amended in light of that, and further, consultation. In May 2018 the document was submitted to OPDC and Brent Council who undertook their own formal public consultation between July and September 2018. The Plan and responses were then sent to an independent inspector for examination; the examiner’s report was received in February 2019. This final version of the Plan was produced accordingly and will be taken to a local referendum within 2019. If local people vote to adopt the Plan, it will become a statutory planning document.
- 1.12. A vision was drawn up of how the Forum wanted the area to develop over 15 years. The end of the Plan period is therefore 2034.

Format of the Plan

- 1.13. The Plan comprises a vision for the area, a set of objectives and a number of policies set out in interrelated topic chapters. The planning policies are in light blue boxes. There are also a number of community aspirations or statements of intent, sometimes requiring action by the Forum or other agencies. These are in pale orange boxes.

Blue boxes = Harlesden Neighbourhood Plan formal policies

Orange boxes = Community Aspirations to guide development and local projects

- 1.14. Towards the end of the document there is a chapter on site allocations and other potential development sites which gives preferred uses and policy for individual development sites. There is a section on design principles, comprising key design criteria and guidance notes for

² The Statement of Consultation, along with a second accompanying document - the ‘Basic Conditions Statement’ - can be found on the Harlesden Neighbourhood Forum website under ‘The Plan’.

future town centre development. The final chapter explains how the Forum expects the delivery of the Plan's vision to happen.

2. RELEVANT PLANS AND PLANNING POLICY DOCUMENTS

Introduction

- 2.1. The Neighbourhood Plan has to have regard to, and be in conformity with, existing plans and planning policies at local, regional and national level. National planning policy is mainly set out in the National Planning Policy Framework (NPPF).
- 2.2. In London there is an additional regional level of plan making. This is called the London Plan and plans below this level, i.e. both borough local plans and neighbourhood plans, must be in conformity with it. The Neighbourhood Plan should be aligned with the strategic needs and priorities of the wider local area so they must be in general conformity with the strategic policies of the relevant Local Plans.

NATIONAL PLANNING POLICY FRAMEWORK

- 2.3. The National Planning Policy Framework (NPPF) sets out national planning policy and provides general guidance on a wide range of planning matters. It includes a presumption in favour of sustainable development, i.e. if a planning application is made which is considered to be sustainable development then there has to be good reason for rejecting the proposals. Where there are no policies relevant to the application, either within the Neighbourhood Plan or other relevant and up-to-date plans for the area, then Brent Council should grant permission unless material considerations indicate otherwise. Since the neighbourhood plan was drafted, there have been two revisions to the NPPF, the latest being February 2019.³
- 2.4. The NPPF outlines the purpose of neighbourhood planning as to *"gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development..."* (Para. 29, NPPF 2019).
- 2.5. The NPPF establishes the framework for developing local and neighbourhood plans. In terms of producing Neighbourhood Plans, the NPPF states that *"Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies"*. The principles of the NPPF are based on *"a presumption in favour of sustainable development"*. It is stated that *"Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area"*. Para. 9, NPPF 2019).

³ <https://www.gov.uk/government/publications/national-planning-policy-framework--2> accessed April 2019

2.6. In delivering sustainable development, the NPPF sets out planning policy for a number of topic areas. The Harlesden Neighbourhood Plan policies have been informed by the guidance set out in the NPPF, with the following topics being the most relevant:

- Delivering a sufficient supply of homes;
- Building a strong, competitive economy
- Ensuring the vitality of town centres;
- Promoting healthy and safe communities;
- Promoting sustainable transport;
- Achieving well-designed places;
- Meeting the challenge of climate change...;
- Conserving and enhancing the natural environment; and
- Conserving and enhancing the historic environment

LONDON PLAN

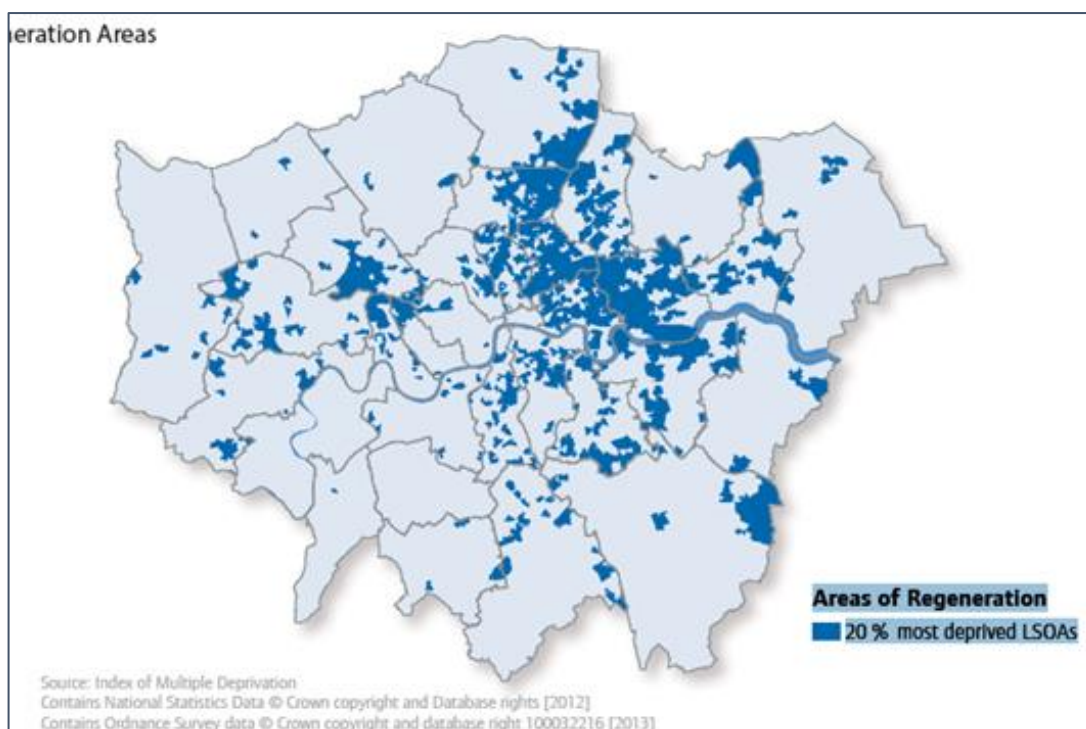
2.7. A neighbourhood plan must be in general conformity with the London Plan. The London Plan contains detailed planning policy which must be applied, where relevant, to proposals in the Harlesden Neighbourhood Plan Area unless there are very good reasons for not doing so.

2.8. The current London Plan (2016)⁴ contains some policies of relevance to the Harlesden area, including for example, the identification of Old Oak Common (which includes part of the Neighbourhood Plan Area) as an Opportunity Area. According to the existing London Plan *“Old Oak Common has significant regeneration potential for new housing and jobs and could make a major contribution to London’s position as a world business centre.”*

2.9. *Almost all of the Harlesden Neighbourhood Plan Area also falls within a designated Regeneration Area as shown on Fig.2 below. According to policy 2.14 of the London Plan, “the Mayor will work with strategic and local partners to co-ordinate their sustained renewal by prioritising them for neighbourhood-based action and investment”. Policy also requires Boroughs “to set out integrated spatial policies that bring together regeneration, development and transport proposals with improvements in learning and skills, health, safety, access, employment, environment and housing”.*

⁴ <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-2016-pdf>
accessed April 2019

Fig.2 Greater
London
Regeneration
Areas



- 2.10. Harlesden is designated as a District Centre in the London Plan. It is classified as having medium potential for growth and where existing capacity can be utilized to achieve regeneration objectives including physical, environmental and economic renewal.
- 2.11. Part of the Neighbourhood Plan Area is also currently within the Park Royal Strategic Industrial Location (SIL). Policy 2.17 for such locations states that *“Development proposals (in SILs) should be refused unless they fall within the broad industrial type activities”* as defined in the London Plan.
- 2.12. A draft new London Plan was published for public consultation in November 2017.⁵ This, when adopted, will supersede the existing (2016) London Plan. The Examination into the Plan commenced in January 2019 and it is estimated that adoption will be in autumn 2019.

BRENT LOCAL PLAN

- 2.13. Brent’s Local Plan comprises a number of documents.⁶ The main one is the Core Strategy which sets out the spatial vision of how Brent should be in 2026 and how this will be achieved. It includes the overarching spatial strategy and key planning policies.

Core Strategy

- 2.14. One of the key challenges set for the Core Strategy is to promote housing development to exceed the London Plan target for Brent comprising more affordable and more family housing. Although, because of the lack of large development sites, Harlesden isn’t one of

⁵ <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/download-draft-london-plan-0> accessed April 2019

⁶ <https://www.brent.gov.uk/services-for-residents/planning-and-building-control/planning-policy/local-plan/> accessed April 2019

the 5 growth area of the borough identified in the Core Strategy , it is identified as a town centre to which new retail development should be directed. Paragraph 5.10 recognises that *“New retail investment is vital if Brent's declining centres are to be regenerated and thus continue to be important foci for their local communities”*.

Site Specific Allocations

- 2.15. Another important document comprising part of Brent's Local Plan is the Site Specific Allocations document. This includes policy and proposals for specific sites in the borough including 5 in the Harlesden Neighbourhood Plan Area. Of these 3 have been developed and the two remaining sites are detailed below. It is appropriate for the Harlesden Neighbourhood Plan to update and modify these site allocations.

Harlesden Plaza

- 2.16. This site comprises the Tesco store together with neighbouring shops and car park as well as some High Street properties including the Methodist Church.
- 2.17. The site is in multiple ownership. Proposals are for a mixed-use development including supermarket, residential development, community space and public space.

Manor Park Road

- 2.18. This site comprises Industrial buildings including Manor Park Works located behind existing commercial and retail development set back from the junction of Manor Park Road and Park Parade.
- 2.19. Proposals are for residential development with amenity/open space.

Development Management Policies

- 2.20. Also comprising the Brent Local Plan is the Development Management (DM) Policies document. The DM Policies document was adopted by Brent Council in November 2016. It includes detailed policies for determining planning applications, relating to the full range of development possibilities, across the borough. For example, it includes proposed policy for change of use from shops to take-aways, policies on the design of new development, conservation, sustainability and a range of other matters. A new designation for the boundary of Harlesden town centre is included which means the centre boundary extends down Station Road towards Willesden Junction station and along the High Street to Scrubs Lane.
- 2.21. See figure 3 below for Brent Local Plan Policies Map.

Review of Brent's Local Plan

- 2.22. Brent is well into a review of its Local Plan and has progressed through a number of stages, completing public consultation on Preferred Options in January 2019. The next stage is public consultation of a final draft Local Plan which will be made available for comment for 6 weeks prior to submission for examination.

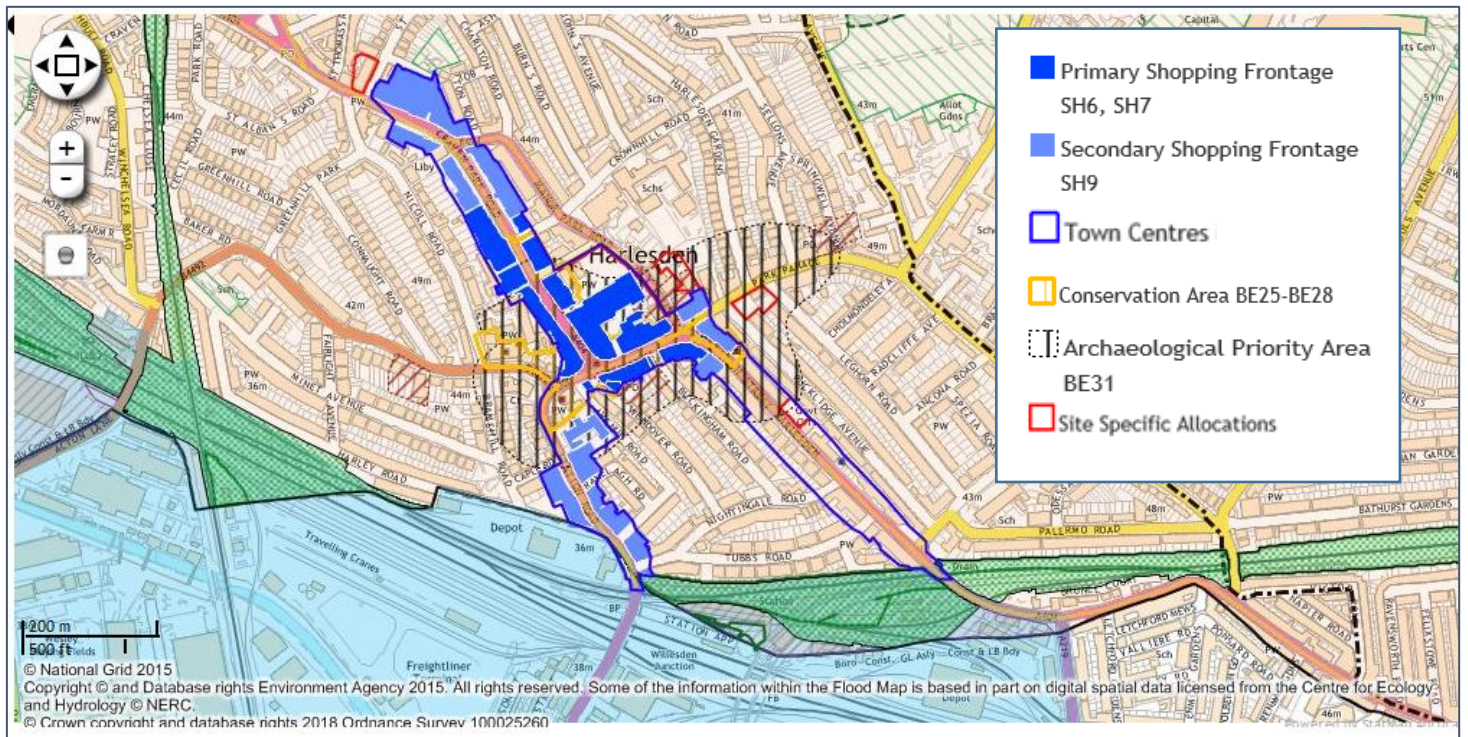


Fig. 3 Extract from Brent's Local Plan policies map showing Harlesden town centre⁷

HAMMERSMITH & FULHAM AND EALING LOCAL PLANS

- 2.23. A small part of the Neighbourhood Plan Area just to the north of the West Coast Main Line falls within these two boroughs. It is important therefore to have regard to relevant policy in these boroughs' Local Plans. The most important of these is the designation as a Strategic Employment Location of the bus depot site and adjacent land in Ealing's Local Plan.

OLD OAK AND PARK ROYAL DEVELOPMENT CORPORATION

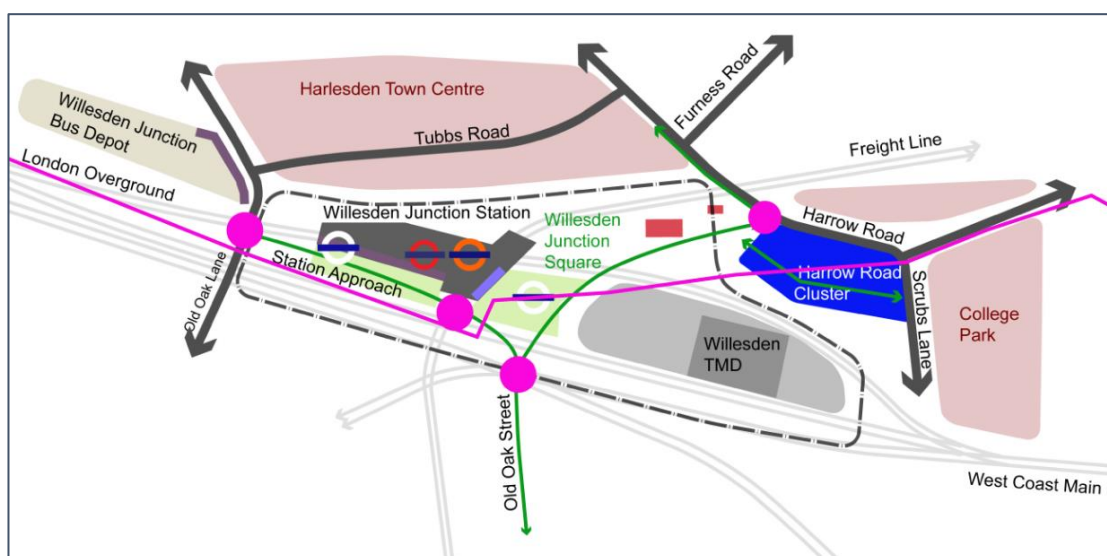
- 2.24. Since 1st April 2015 the Local Planning Authority for the southern part of the Neighbourhood Plan Area, around Willesden Junction station and the bus depot, has been the Old Oak and Park Royal Development Corporation (OPDC). The OPDC now determines planning applications within its area, which covers the whole of Park Royal as well as Old Oak, and is now the Local Plan making authority for this area. The OPDC submitted the draft Local Plan for Examination in October 2018.
- 2.25. Prior to the preparation of the draft Local Plan the Mayor of London produced the Old Oak and Park Royal Opportunity Area Planning Framework⁸ (OAPF) which was adopted in November 2015. This document provides supplementary detail to the planning policies contained within the London Plan in the form of Supplementary Planning Guidance (SPG). It includes a vision and objectives for the regeneration of the area as well as setting the context for the quantum and type of development to be delivered.

⁷ Source <https://www.brent.gov.uk/policies-map> accessed April 2019

⁸ <https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/opdc-planning/old-oak-and-park-royal-opportunity-area-planning-framework> accessed April 2019

- 2.26. The key parts of the document of particular importance to Harlesden deal with development within and close to the Harlesden Neighbourhood Plan Area as well as the impact of new transport systems and the scale of development that will be brought forward. Examples of this are the guidelines for development around Willesden Junction station, such as on the height of buildings and how this will link into Harlesden town centre.
- 2.27. The OPDC submitted the draft Local Plan for Examination in October 2018.⁹ The submitted Plan contains policies relevant to the Harlesden Neighbourhood Plan Area, both in terms of policy for the development of sites within the Area as well as for development in the rest of Old Oak and Park Royal which could have significant effects on Harlesden. For sites within the Harlesden Neighbourhood Plan Area, the key section of the OPDC draft Local Plan is that relating to Willesden Junction, i.e. policies P8 and P11 in Chapter 4 Places. This is accompanied by a diagram, shown below in Fig 4 (Neighbourhood Plan Area boundary added as red line), and the designations identified on the OPDC Local Plan policies map. Key spatial policies in the Plan include the continued designation of Willesden Junction Bus Depot site as part of a Strategic Industrial Location and the new Old Oak Street linking with Station Approach. It is anticipated that the OPDC Local Plan will be adopted in Autumn 2019.

Fig. 4 OPDC
2018 Draft
Local Plan
Willesden
Junction Place
Diagram
figure 4.44



- Clusters
- Place boundary
- Existing and enhanced key routes
- Walking and cycling routes
- Railway lines
- New or enhanced publicly accessible open space
- Rail Depot
- London Overground and Underground Station
- Existing residential neighbourhood
- Proposed Local Heritage Lising
- Strategic Industrial Location (SIL)
- Station entrance
- Active frontage
- New and improved junction / bridge / underpass
- Transport interchange
- Harlesden Neighbourhood Forum boundary

⁹ <https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/get-involved-opdc/opdc-consultations/opdc-second-revised-draft-local-plan-2018> accessed April 2019

3. VISION AND OBJECTIVES

- 3.1. The vision for Harlesden was drawn up by the local community after a visioning workshop in February 2016, and is aspirational but also realistic:

Vision

'The Harlesden Neighbourhood Plan outlines our vision to build a collaborative community that embraces the evolving cultural identity of Harlesden, while celebrating its rich history and heritage. The Harlesden Neighbourhood Forum aims to combat deprivation and increase the wellbeing of its residents by addressing the importance of affordable housing, a thriving local high street and local economy with increased access to opportunities in a safe and clean environment.'

- 3.2. From the vision flow a number of objectives for Harlesden which have been developed and endorsed by the Forum after the key planning issues were identified and discussed. The challenges which arose from the identification of the planning issues are:
- Dealing with the pressures on land in a densely-built area so that sufficient development can be delivered, in a sustainable way which meets the needs of the growing population.
 - Ensuring that there are sufficient homes, particularly affordable homes, to meet local needs.
 - Addressing the need for local people, particularly the unemployed, to access jobs including the new jobs that will be created in Old Oak.
 - Developing the town centre so that it provides a balanced range of shops and services
 - Improving transport access for residents and visitors whilst minimising the impact of traffic on the town centre and the residential environment.
 - Improving access to open space, including play provision, for residents.
 - Ensuring that the best aspects of the environment, such as heritage assets or buildings that provide the area with its character, are protected and enhanced, and that the highest quality of design is promoted for new development.
 - Retaining existing community assets and ensuring that there is sufficient social infrastructure to meet the needs of the growing population.

Objectives:

- Deliver an increase in the number of new affordable homes, including those for rent and for first time buyers.
- Reduce homelessness locally
- Protect existing jobs and improve job opportunities for local people
- Improve the attractiveness of the town centre by improving its vitality and viability
- Improve public transport access, in particular through station improvements.
- Reduce the impact of traffic on the area
- Increase the amount of open space locally and improve the street environment.
- Protect buildings / structures that contribute to the area's character
- Protect and improve existing community facilities.
- Provide a new community hub which can act as a focal point for the area

Sustainable development

- 3.3. In accordance with the requirements of national planning policy and with planning objectives and policies in the London Plan and applicable Local Plans, policies set out in the Neighbourhood Plan are framed where appropriate so that they will help achieve sustainable objectives, including addressing and mitigating climate change.
- 3.4. Those proposing development should also have regard to policies in the London Plan and relevant Local Plans, which address a complete range of environmental issues such as climate change (adaptation and mitigation), air quality, noise and waste as well as the location of development so that that it can be easily accessed by a range of travel modes. The Neighbourhood Plan includes policies which will lead to development being more sustainable by, for example, promoting trip-generating development in the town centre where public transport, walking and cycling access is good, proposing higher density housing development in line with the London Plan's density matrix, i.e. where public transport access is better (Policy H2), improving access to public open space and play facilities (Policies E1 and E3), greening the environment (Policy E8) and promoting and prioritising sustainable modes of transport alongside a reduction in car parking (Policies T1, T3, T4 and Site 1).

Policy G1 – Sustainable Development

In proposing development within the Neighbourhood Plan Area, it should be ensured that development is sustainable and, in particular, regard should be had to policies in Chapter 5 of the London Plan and policies CP19 and DMP9 of Brent's Local Plan

4. POLICIES

All of the policies which feature in the Harlesden Neighbourhood Plan are listed for reference below, however they also appear, and are designed to be read, alongside evidence and supporting text laid out from Chapter 6 onwards.

Sustainable Development

Policy G1 – Sustainable Development

In proposing development within the Neighbourhood Plan Area, it should be ensured that development is sustainable and, in particular, regard should be had to policies in Chapter 5 of the London Plan and policies CP19 and DMP9 of Brent's Local Plan

Housing

Policy H1 – Site allocations and potential sites for new housing

The following **site allocations** are identified as development sites which should include housing units:

- Harlesden Plaza – 208 units (Site Allocation 1, and see also on this site Environment and Open Space chapter 'Town Square' and Design Principles chapter)
- Salvation Army Hall and Manor Park Works, Manor Park Road – 31 units (Site Allocation 2)
- Former Willesden Ambulance Station, 164 Harlesden Road – 8 units (Site Allocation 3)
- Willesden Junction Station (Site Allocation 4)

The following **potential development sites**, if brought forward for development in the future, should also include housing:

- Site at junction of High Street and Furness Road (north side)
- Vacant land on Harley Road
- Land at Challenge Close and rear of 50-70 Craven Park Road

Other uses in addition to housing may be suitable on some sites (See more detail about these sites in Chapter 11 'Site Allocations'.)

Policy H2 – New housing density

Density of new housing development should be optimised taking account of the development site's connectivity and accessibility and subject to the proposals being acceptable in terms of local context and design. Density at Willesden Junction will be determined in the OPDC's Local Plan.

Policy H3 – Housing floorspace retention

A net loss of housing floorspace will not be acceptable in Harlesden apart from the ground floor properties in Station Road. These form part of an existing shopping parade which has been designated as part of Harlesden Town Centre by Brent. As such, the proposed use is appropriate within a town centre as it provides active frontage. Residential units above should be retained.

Community Facilities

Policy CF1 – Community space provision

Harlesden Plaza has been identified as a development site where space for the community can be provided on development / redevelopment. If this site is not brought forward for development then Community Infrastructure Levy (CIL) funds, if and when available, will be targeted for the provision of new community space and/or improvement of existing ones.

Environment and Open Space

Policy E1 – Public open space provision

The provision of new public open space will be sought within the area deficient in local open space on the development of sites over 0.5 hectares (see map in Fig. 14 in the Plan which defines this area including the area to the south of the Brent borough boundary shown as blank).

Policy E2 – Food growing space provision

Local food growing will be promoted by encouraging major new residential development to include space for residents to grow their own food.

Policy E3 – Safe play provision

Harlesden Neighbourhood Forum will consider options for implementing safer streets schemes, including areas for children's play.

The priority area for the provision of new play areas will be the area shown as deficient in local open space (See map in Fig. 14 in the Plan which defines this area including the area to the south of the Brent borough boundary shown as blank).

One of the priorities for any CIL funding in the Neighbourhood Plan Area will be for the provision of safe play space in streets.

Policy E4 – Non-designated heritage assets

The following buildings / features are identified as non-designated heritage assets that should be subject to relevant London Plan and Brent Local Plan policy:

- St Margaret's & St George's, 67 Craven Park Road
- Harlesden Branch Library, Craven Park Road
- Harlesden Baptist Church, 27 Acton Lane
- The Shawl pub, 27 High Street
- All Souls Church Vicarage, 3 Station Road
- Postal Delivery Office, Station Road
- Vacant HSBC building, 60 High Street
- Le Junction pub, 47 Station Road
- Public art (The Workers) at junction of Rucklidge Avenue & Park Parade
- Church of God of Prophecy, Tubbs Road

Policy E5 – New town square

The provision of a town square will be sought on development / redevelopment of the town centre car park and adjacent properties, also known as Harlesden Plaza. This should be a minimum of 800 m2 in area. (Please see indicative images in Figs. 18-22 in the Plan and Chapter 11 'Site Allocation 1' for more on this site)

Policy E6 – Quality gateways to Harlesden

Development at gateways will be expected to add to the sense of arrival at Harlesden. The quality of development at gateways, and along main routes into the centre from them, will be given significant weight when considering planning applications. CIL funding will be directed towards public realm improvements at the principal gateways.

Policy E7 – Public art provision

The provision of public art will be sought on the development of key, large sites in the town centre. In particular, the design of new on-site open space should include a place for public art.

Policy E8 – Tree provision

There should be appropriate mitigation for the loss of trees on development, including a contribution towards the planting of new street trees locally if new trees cannot be provided on site.

One of the priorities for any CIL funding in the Neighbourhood Plan area will be for the provision of new street trees.

Policy E9 – Tall buildings

Tall buildings will be acceptable at Willesden Junction station where it can be demonstrated that they will enhance local character, by responding to existing local architectural and urban design characteristics and will not have an unacceptable harmful impact on the character and appearance of their surroundings, including the residential neighbourhoods to the north of the rail tracks.

Buildings of over four storeys may be supported if they contribute favourably towards retaining the historic character of Harlesden town centre and respond appropriately to the existing urban design characteristics.

Local Economy

Policy LE1 – Local employment sites

Redevelopment of Local Employment Sites for alternative use will be acceptable providing appropriate evidence is submitted to satisfactorily demonstrate that the current employment use is no longer viable and that there is no reasonable prospect of the site being used for another appropriate employment purpose; or there are significant regeneration benefits for the site. If an existing business wishes to remain in the area it should be demonstrated how applicants have worked to find suitable relocation sites or replacement premises, in the first instance, within the Harlesden area, then within the wider area.

Policy LE2 – Shop front enhancements

Well-designed improvements to existing shop fronts will be welcomed. Proposals for new shop fronts should be designed to be well proportioned and enhance the character of Harlesden. Shop front features of architectural merit should be retained. Improvements will be prioritised within the conservation area and along Station Road.

Proposals for new or altered shop fronts should be prepared in accordance with the guidance and principles set out in Brent Council's Shopfront Guidance.

Policy LE3 – New space for town centre uses

The development of new floorspace for retail or other town centre uses within Harlesden town centre, and connecting into Old Oak major town centre, will be supported providing it does not conflict with policies in relevant Local Plans.

Sites are identified in the Site Allocations chapter of this Plan (See Chapter 11) where the development of floorspace for new retail and other town centre uses should be accommodated. The town centre is defined in Fig.3. Brent's Local Plan policies map.

Transport and Access

Policy T1 – Willesden Junction Station access

Development at Willesden Junction station should include improvements to, and/or new, pedestrian and cycling access both from Station Road and from Harrow Road. (Please see Chapter 11 'Site Allocation 4' for more on this site)

Policy T2 – Town Centre parking space retention

An element of public car parking will be provided in any development or redevelopment of the privately-operated car park site at Tavistock Road/Manor Park Road. The number of spaces to be provided will take into account the other proposed land uses on the site and will be determined in consultation with the London Borough of Brent. (Please see Chapter 11 policy SA 1 'Site Allocation 1' for more on this site)

Policy T3 – Cycling provision

The priorities for new cycling provision are a new cycle route from Willesden Junction station along Station Road to the High Street together with cycle parking facilities in the town centre.

Policy T4 – Station Road environment improvements

The priority route for improvements to the pedestrian environment is from Willesden Junction station along Station Road to the High Street. Development at Willesden Junction and along Station Road should be designed so as to improve conditions for pedestrians.

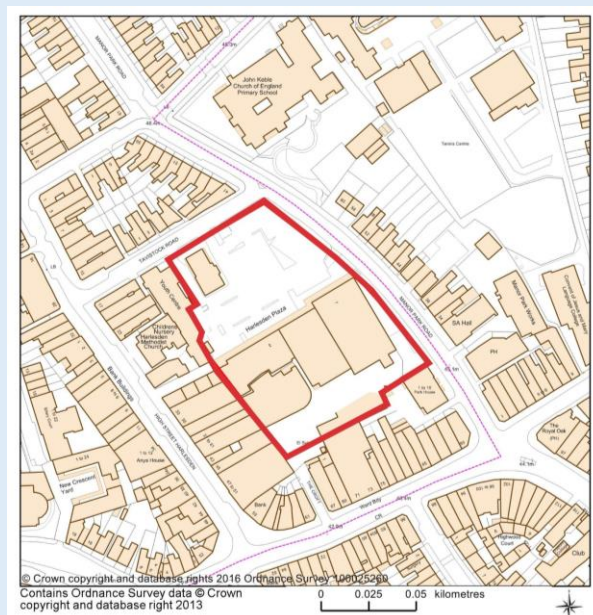
Site Allocations

Policy SA 1 – Harlesden Plaza site allocation

Development should include commercial on the ground floor, a justified amount of replacement car parking, community space, residential on upper levels and a town square open to the public. (Please see in Chapter 8 'Town Square' and indicative images in Figs. 18-22 in the Plan, as well as Chapter 6 Housing and Chapter 12 Design Principles for more on this site).

Any development should contribute towards Harlesden's historic character and respond to local urban design characteristics. The town square should be positioned so that it is visible from both the High Street and from Manor Park Road, and should be accessible to pedestrians from these streets, and from the south. Ideally, public car parking will be basement parking.

It should be clearly demonstrated that the water supply and drainage requirements of any redevelopment scheme have been appropriately addressed.



Policy SA 2 – Salvation Army hall and Manor Park Works site allocation

Development should be for residential and a replacement Salvation Army hall. Development could be brought forward for the Salvation Army site separately, although there are significant benefits, such as the provision of common access off Manor Park Road, if the site is developed comprehensively. Proposals should have regard to the Archaeological Priority Area designation across the site.



Policy SA 3 – Former Willesden Ambulance Station, 164 Harlesden Road site allocation

Development of site should be for residential use.

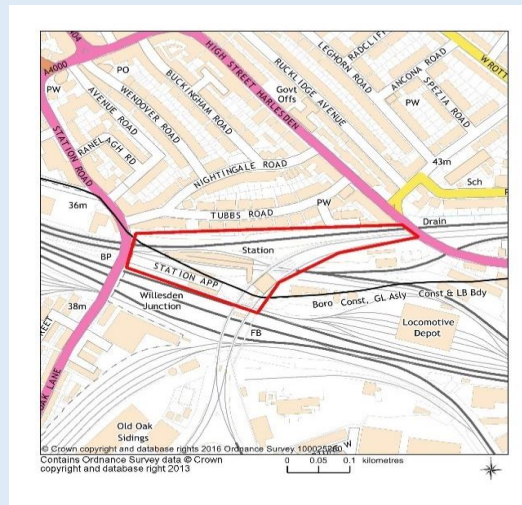


Policy SA 4 – Willesden Junction Station site allocation

Development adjacent to, and over, Willesden Junction station should include residential, offices and town centre uses with active frontages at ground level. Improvements to the station should include good pedestrian access from the north, especially from Station Road. Improvements to the access from Harrow Road will also be required, including safety improvements. There should be a direct and attractive pedestrian route to Harlesden from the new bridge over the West Coast Main Line. A cycle route and cycle parking facilities should also be provided.

Any tall buildings should not have an unacceptable adverse impact upon their surroundings.

It should be clearly demonstrated that the water supply and drainage requirements of any redevelopment scheme have been appropriately addressed.



Design Principles

Policy DP1 – Town centre development design principles

The following principles should to be considered within design options for development proposals in Harlesden town centre:

Material: Prioritisation of brick and other high quality traditional materials present in the conservation area with an emphasis on durability

Form: Buildings should be carefully articulated to retain a feeling of the ‘human scale’ of Harlesden. They should respond positively to the fine street grain present in the conservation area, and the variation in forms, notably at roof level to add visual interest

Height: The height of buildings in the town centre should be appropriate to their setting and should contribute favourably towards retaining the historic character of Harlesden town centre and respond appropriately to the existing urban design characteristics

Features: The public square should be designed taking into account the safety and comfort of users of all ages – with well-designed lighting, seating and surfaces. It should be versatile enough to host social and community activities for daytime and evening in all seasons. A softer landscaping element and/or focal point should also be included

Layout and access: Active frontages on the square, natural surveillance and good legibility. Plaza access points in particular should be animated, and prioritise safety (particularly at roads) and visibility

Delivering the Neighbourhood Plan

Policy D1 – Community Infrastructure Levy funding priorities

Priorities for the use of Neighbourhood CIL funds are:

- improvements to the pedestrian environment from Willesden Junction station along Station Road to the High Street;
- provision of new cycle routes (in line with priority routes shown in Figure 36) together with cycle parking facilities in the town centre;
- planting of new street trees;
- provision and laying out of new public open space or improvement of existing open space;
- provision of safe play space in streets;
- town centre improvements;
- and community facilities.

5. Community Aspirations

All of the community aspirations which feature in the Harlesden Neighbourhood Plan are listed for reference below, however they also appear, and are designed to be read, alongside policies, evidence and supporting text laid out from chapter 6 onwards.

Community Aspiration 1 – Old Oak affordable homes

The Neighbourhood Forum will continue to liaise with the OPDC to try to secure a proportion of the affordable homes delivered at Old Oak are for those in need in the Harlesden area.

Community Aspiration 2 – Affordable housing

The Forum recognises that policy for affordable housing in the London Plan as well as policy DMP 15 of Brent's Local Plan (and ultimately emerging policy in the OPDC Local Plan) will apply to development proposals for housing in the Neighbourhood Plan Area. In order to contribute fully to meeting the levels of need identified for Harlesden, the Forum wishes to see the level of affordable housing provided on individual sites maximised.

Community Aspiration 3 – Harlesden Community Land Trust

The Forum will investigate with key community stakeholders whether there is any commitment towards, and the likelihood of available site(s) for the promotion of, a community land trust for Harlesden.

Community Aspiration 4 – Assets of Community Value

The Forum will nominate the following as Assets of Community Value:

- Challenge House, 1-2 Bank Buildings, Craven Park Road
- Royal Oak, 95 High Street
- Harlesden Picture Palace, 26 Manor Park Road
- Le Junction, 47 Station Road
- The Shawl, 25 High Street

Community Aspiration 5 – Roundwood Park recreation space

The Forum will work with local environmental and community groups to press Brent Council to improve the southern part of Roundwood Park Annexe either through the provision of sports pitches or more informal recreational space.

Community Aspiration 6 – Safe play site identification

In order to bring forward safer streets schemes within Harlesden, the Forum will identify locations where schemes are appropriate and liaise with Brent Council to secure funding and implementation, working closely with local nurseries, schools and community groups.

Community Aspiration 7 – Station Road land use

The Forum will continue to engage with the OPDC to encourage a more satisfactory use of the bus depot site and adjacent land. Ideally, this would include residential, open space, and uses with active frontages on Station Road, and subject to the depot being adequately relocated.

Community Aspiration 8 – Opportunities in OPDC area

The Forum will engage with the OPDC, Brent Council and other relevant agencies (including local charities and community groups) to assist people from Harlesden in being given opportunities to improve their skills, training and qualifications and access jobs generated in Old Oak and Park Royal.

Community Aspiration 9 – Town centre expansion

The Neighbourhood Forum supports the expansion of the town centre south towards Willesden Junction station and Scrubs Lane, as proposed by Brent Council and shown on Brent's policies map (See Fig. 3 in the Plan).

The Forum will also work with Harlesden businesses to engage with the OPDC and Brent Council to help ensure that, as retail development is proposed and brought forward at Old Oak, it does not have an adverse impact upon trade in Harlesden town centre.

Community Aspiration 10 – Supporting shop front enhancements

Working with local businesses and the Council's Town Centre Manager for Harlesden, the Forum will explore opportunities to obtain funding for shop front improvements. Additionally, the Forum will press Brent Council to take enforcement action against shop fronts that are inappropriate and implemented without the necessary planning consent.

Community Aspiration 11 – Promoting the town centre

Alongside local businesses, the Forum will work with Brent Council's Town Centre Manager for Harlesden, to develop a marketing strategy and/or cultural offer for Harlesden and promote the centre as a destination. It will investigate the opportunities for the provision of a speciality market in the town centre.

Community Aspiration 12 – Direct OPDC bus route

The Neighbourhood Forum will liaise with the OPDC, TfL, the boroughs and bus operators to seek a direct bus route from Harlesden through the Old Oak major centre to the new interchange station once the station is operational.

Community Aspiration 13 – Traffic level rise mitigation

The Forum will liaise with the OPDC and TfL regularly to ensure any traffic level increases that may be generated in Harlesden as a result of redevelopment at Old Oak are minimised, and the Forum will also seek mitigation measures for any subsequent increases in traffic levels.

Community Aspiration 14 – Types of Pedestrian and Cycle access improvement

The Forum will work with Brent council, the OPDC, local groups and accessibility and cycling organisations to identify which types of improvements to pedestrian and cycle access in Harlesden are appropriate. The Forum will also support the delivery of subsequent schemes which will make access safer, easier and more appealing.

6. HOUSING

Introduction

- 6.1. The substantial population growth within the area between 2001 and 2011¹⁰, together with a lack of new house building locally, has contributed to a worsening housing situation in the area. Harlesden is very densely populated with a density for Harlesden & Kensal Green wards of 14,795 people per square kilometre as against Brent as a whole at 7,406 per sq. km and London at 5,293 per sq. km.¹¹ The population of the area is also growing, having increased by about 50% between 2001 and 2011.

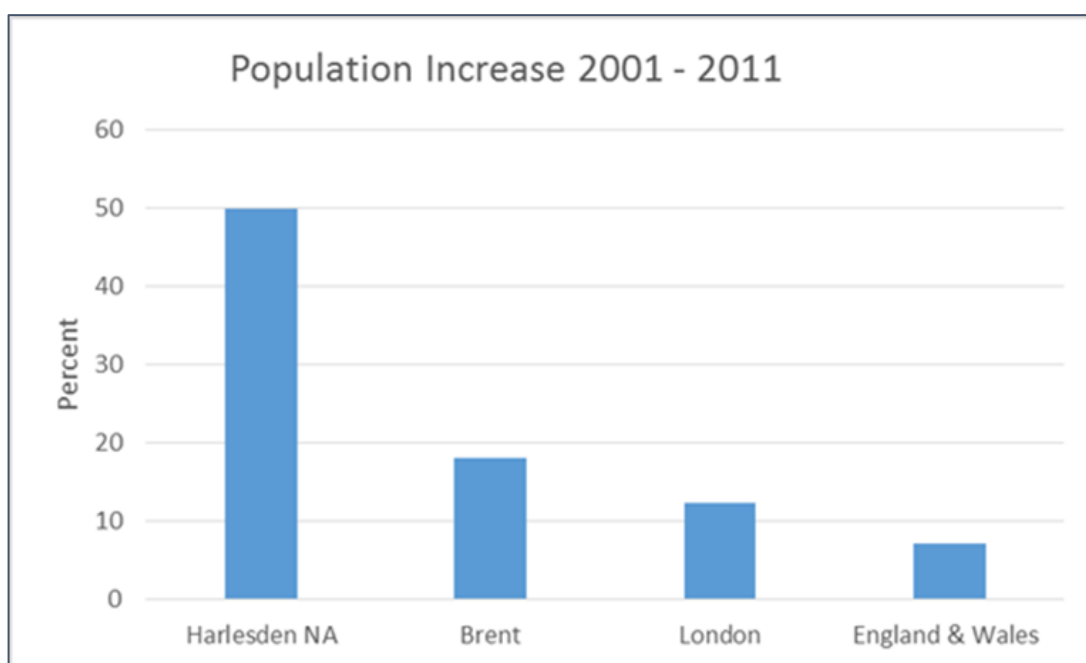


Fig.5
Population
increase

- 6.2. Although this rate of growth for Harlesden is unlikely to be maintained (both Harlesden & Kensal Green are projected to have stable populations between 2016 and 2031 at +1.2% only¹²), population projections for London as a whole show a growth of 23% between 2011 and 2031 meaning that there will continue to be huge pressure on resources, particularly land, for the foreseeable future.
- 6.3. The level of overcrowding in the Harlesden Neighbourhood Plan Area is extremely high by any standards, at 36% of all households. This compares with 30% for Brent as a whole, which itself is extremely high, and 11% for London (2011)¹³.

¹⁰ See Housing Needs Assessment via www.HarlesdenNeighbourhoodForum.com

¹¹ GLA Datastore, Land Area and Population Density, Ward and Borough, available at

<http://data.london.gov.uk/dataset/land-area-and-population-density-ward-and-borough> accessed April 2019

¹² GLA Datastore Population Projections, available at <https://data.london.gov.uk/dataset/projections> accessed April 2019

¹³ UK Census 2011

- 6.4. Homelessness is also a significant problem in Harlesden and has long been officially recognised as such by local organisations working with homeless people. Although there are no specific figures for homelessness in Harlesden, Brent as a whole experiences amongst the highest levels of homelessness, including households in temporary accommodation, in the country.¹⁴ In March 2016, Brent had the 3rd highest rate of households in temporary accommodation of any London Borough, after Newham and Haringey, at 25.12 households per 1,000 (Dept. of Communities & Local Government).
- 6.5. In terms of Housing Benefit claimants in 2013, Harlesden ward is exceptionally high at 30% of households whilst Kensal Green ward is high at 19.9% compared to 14.7% for Brent and 12.2% for London ¹⁵
- 6.6. As well as a need for cheap rental accommodation to house those who are homeless, potentially homeless or living in overcrowded conditions, there is also a need for affordable homes to enable individuals or families, and especially first time buyers, to access home ownership. Currently the cost of homes locally is well beyond the budget of the vast majority of households. Household incomes in Harlesden are very low. A median household income for Harlesden ward of £27,030 in 2012/13 is only 84% of the Brent median (£32,140) and only 69% of the London median (£39,000). Median incomes placed Harlesden ward within the 10 most income deprived wards in London, out of over 628.¹⁶ Furthermore, the ratio of lower quartile earnings to lower quartile house prices in Brent is 11.95, higher than it has ever been including before the ‘crash’ in 2008, and higher than most other London boroughs and well above the Outer London ratio of 9.79. This ratio is likely to be substantially higher in the Harlesden area which had an average price for a one bedroom flat of £315,000 in April 2017 (Source: Homes & Property)¹⁷ clearly beyond the means of the vast majority of households locally.
- 6.7. In assessing housing need for Neighbourhood Plans, the Planning Advisory Service (PAS) advice is that “neighbourhood plan housing policy needs to be underpinned by robust, objectively assessed data providing a picture of housing need at the level of the Neighbourhood Plan Area. In most cases, this draws from, but differs in some respects from, the local authority housing needs advice base.”¹⁸ The primary local authority housing needs evidence base is the Strategic Housing Market Assessment (SHMA). There are two which are particularly relevant for Harlesden, as follows.

¹⁴ <https://www.gov.uk/government/collections/homelessness-statistics#statutory-homelessness-and-prevention-and-relief> accessed April 2019

¹⁵ GLA Datastore, Ward Profiles and Atlas, available at <https://data.london.gov.uk/dataset/ward-profiles-and-atlas> accessed April 2019

¹⁶ Ibid.

¹⁷ Available at <https://www.homesandproperty.co.uk/area-guides/brent-borough/harlesden/living-in-harlesden-area-guide-to-homes-schools-and-transport-a109896.html> accessed April 2019

¹⁸ Planning Advisory Service, PAS Neighbourhood Planning Advice Note - Housing Needs Assessment for Neighbourhood Plans, available at <https://www.local.gov.uk/sites/default/files/documents/view-advice-note-here-cb3.pdf>, accessed March 2019

Brent Strategic Housing Market Assessment, Jan 2016

- 6.8. Brent Council has recently published an up-to-date Strategic Housing Market Assessment (SHMA)¹⁹ This assessment is for the whole of Brent. The key conclusions and recommendations are as follows:

To meet housing needs the SHMA identifies an additional 47,470 dwellings required in the period 2011-37. This is an average of 1,826 new dwellings per annum. This requirement is above the Borough's current delivery target as set out in the London Plan of 1,525 dwellings per year to 2026. Clearly the borough is unable to meet its objectively assessed housing need in full.

- 6.9. Of the need identified for the period 2011-2037, a significant proportion, 52% (when taking account of concealed households), is for affordable housing. The report concludes that the affordable rent product (80% of market rent) is unaffordable to 92% of those in affordable housing need. Indeed, incomes are so low for those in need that 68% are unable to afford target rents for social rented housing without some form of benefit support. In terms of sensitivity testing only a significant drop to affordable rents being around 50% of market rent makes 15% of those in affordable need able to afford it.
- 6.10. The SHMA identifies that low cost home ownership products (such as shared ownership) are essentially products that are not relevant to those in affordable housing need. They are for the most part for those who can afford to rent in the open market (and are therefore technically not in affordable housing need), but who cannot afford to buy on the open market.
- 6.11. The study shows that owner occupation has declined from 56% in 2001 to 44% in 2011. This has almost entirely been switched to private sector rented properties. Undoubtedly there is a significant proportion of households in private rented accommodation who cannot afford home ownership. These are not technically in need of affordable housing because they can meet their housing needs, through the market albeit in the rented market. This may indicate a latent demand for intermediate affordable housing products such as shared ownership, discount market, or Starter Homes.
- 6.12. The Council's approach, set out in its Core Strategy, of seeking at least 25% of dwellings to be family sized (3+ beds) is supported by the assessment. In fact, the figures suggest that this level of provision would be significantly under-providing for need/demands which it identifies as being in the order of 66%.
- 6.13. The study identifies that in the period to 2037 the population of those aged 75+ will increase from 14,900 in 2011 to 26,500. The study anticipates the type of housing that the people who fall into this sector will require. The majority of people it is anticipated will stay in general needs housing with care/support where necessary being provided in their homes. The total additional homes required related to this need is 2,900, or 7% of additional needs.

¹⁹ Available at <https://www.brent.gov.uk/media/16403874/d59-brent-shma.pdf> , accessed March 2019

OPDC Strategic Housing Market Assessment (SHMA), May 2017

- 6.14. This assessment establishes the housing need for the 3 local authorities in the OPDC area, namely Hammersmith & Fulham, Ealing and Brent.²⁰ It, therefore, includes need identified specifically for Brent above. The finalised SHMA was presented to Planning Committee in May 2017. The key conclusions and recommendations are as follows:

Based upon long-term projections the SHMA identifies the full objective assessed need for housing in the OPDC Authorities (Brent, Ealing, and Hammersmith and Fulham) to be 99,000 dwellings over the 20-year Plan period 2018- 38, equivalent to an average of 4,950 dwellings per year. This includes the objectively assessed need for affordable housing of 44,400 dwellings, or 45%, over the same period, equivalent to an average of 2,220 dwellings per year.

- 6.15. Given the level of affordable housing need identified, it will be important to maximise the amount of affordable housing that can be delivered through market housing led developments. Key to this is the economic viability of such developments, as this will inevitably determine (and limit) the amount of affordable housing that individual schemes are able to deliver.
- 6.16. It is emphasised that planning policy guidance identifies that councils should also consider “an increase in the total housing figure” where this could “help deliver the required number of affordable homes”.

Harlesden Housing Needs Assessment

- 6.17. A Housing Needs Assessment has been produced by AECOM for the Harlesden Neighbourhood Plan Area. The assessment is based primarily upon data from other studies, such as the Brent SHMA detailed above, and supplemented by local information from the 2011 Census and elsewhere. A housing target figure for Harlesden of 2,249 new homes to be provided between 2015 and 2037 is projected, based upon the London Plan housing target for Brent and the Brent SHMA. This requires an average of 102 new homes to be built annually compared to an average of 18 new homes a year from 2011 to 2015 ²¹.

²⁰ Available at

https://www.london.gov.uk/sites/default/files/2016_02_01_old_oak_park_royal_draft_shma_new_cover.pdf
Accessed March 2019

²¹ London Development Database

6.18. A number of conclusions/recommendations are put forward in the assessment. The key ones are:

- *The Neighbourhood Plan seeks to deliver an increase in affordable housing provision in Harlesden, in particular social housing.*
- *The affordable units to be provided should be mainly social rather than intermediate.*
- *The majority of flatted provision should be 2 bed.*
- *The most appropriate policy response to the high levels of overcrowding and concealed families is strong policy support for new social and intermediate housing, as well as for new flats and small houses.*
- *2,249 dwellings needed up to 2037 is a minimum figure and the high level of overcrowding indicates that demand would likely be present for extra dwellings above this minimum.*
- *As Harlesden has a younger than average population, no specific policy is required in the neighbourhood plan on housing provision for older people.*

Implications for Harlesden Neighbourhood Plan Area

6.19. The above assessments point to an overall housing need in excess of what is likely to be delivered locally, even with an uplift in the number of new dwellings that have been planned for. The capacity in terms of sites is simply not sufficient to meet need locally. This is particularly true of Harlesden. The information specifically for Harlesden set out above, such as the level of overcrowding, the incomes of households and the levels of deprivation generally, indicates that need will be greater in Harlesden than Brent as a whole. However, the opportunities to deliver new housing within Harlesden are extremely limited. It will be necessary to maximise the opportunities that exist, both in terms of the overall need for new dwellings and the proportion of these that should be affordable.

Where to provide new homes

6.20. It is clearly not going to be possible to meet all need within the boundaries of the Neighbourhood Plan Area. It has been made clear by Government that planning authorities “...need to consider whether there are opportunities to co-operate with neighbouring planning authorities to meet needs across housing market areas.” (letter from the Housing Minister to the Planning Inspectorate in December 2014)²². The regeneration of Old Oak, depending on how quickly development can be brought forward and how much of it will be affordable, has the potential to meet some of the need. Sites within the rest of Brent, as identified in the London-wide Strategic Housing Land Availability Assessment (SHLAA) and in Brent’s Local Plan can also contribute to Harlesden’s need.

²² Available at

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/390029/141219_Simon_Ridley_-_FINAL_SIGNED.pdf accessed April 2019

- 6.21. Brent currently has a target of 1,525 for new homes to be built per annum as set out in the London Plan. This is informed by both the borough's objectively assessed need for housing and the availability of sites to deliver new homes. However, it is difficult, and not considered necessary, to refine this target down to the Harlesden level. In order that some of the need can be met as locally as possible, the Neighbourhood Plan has identified sites, in addition to those already identified in Brent's Local Plan, where new homes can be provided, sometimes alongside other uses as part of a mixed-use development. The level of housing need identified above, and the lack of development sites within the area, means that, wherever possible, new housing should be provided on available sites. (NB. The draft revised London Plan proposes a substantial increase in housing targets, including an increase in Brent's target to 2,915 units per annum.)
- 6.22. The following policy lists the site allocations and the potential development sites. The location of the sites is shown in Figure 6 and more detailed information about the sites is given in Chapter 11.

Policy H1 – Site allocations and potential sites for new housing

The following **site allocations** are identified as development sites which should include housing units:

- Harlesden Plaza – 208 units (Site Allocation 1, and see also on this site Environment and Open Space chapter 'Town Square' and Design Principles chapter)
- Salvation Army Hall and Manor Park Works, Manor Park Road – 31 units (Site Allocation 2)
- Former Willesden Ambulance Station, 164 Harlesden Road – 8 units (Site Allocation 3)
- Willesden Junction Station (Site Allocation 4)

The following **potential development sites**, if brought forward for development in the future, should also include housing:

- Site at junction of High Street and Furness Road (north side)
- Vacant land on Harley Road
- Land at Challenge Close and rear of 50-70 Craven Park Road

Other uses in addition to housing may be suitable on some sites (See more detail about these sites in Chapter 11 'Site Allocations'.)

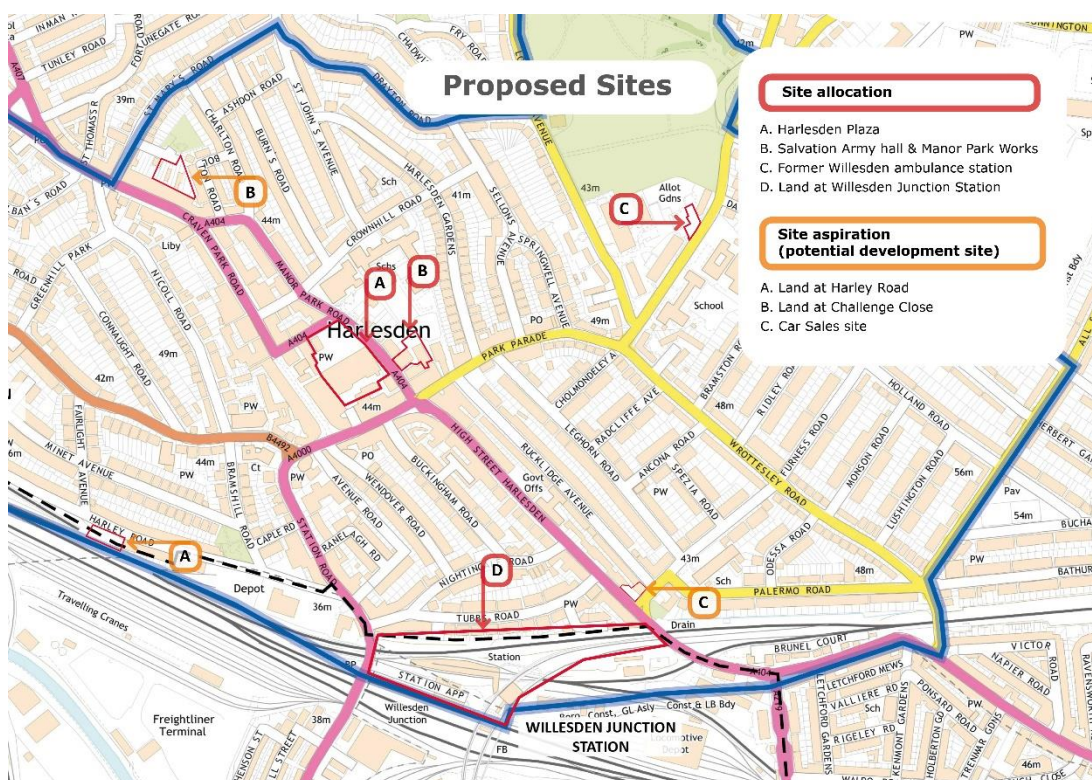


Fig 6. Locations of proposed new sites for development, to include new housing (Policy H1)

- 6.23. Some of the above sites have been allocated for other uses as well as housing, such as Willesden Junction station where commercial uses will also be provided alongside redevelopment of the station. The Neighbourhood Forum will work closely with local community groups and other key stakeholders to ensure the development of these sites reflect community priorities.

Density of New Housing

- 6.24. The London Plan 2016 identifies appropriate density ranges for new housing, depending upon a number of factors such as proximity to town centres and the level of public transport accessibility. The broad ranges also provide the framework within which boroughs can refine local approaches to implementation. The densely developed nature of the Harlesden area, the proximity of the area to the town centre and the generally high level of public transport accessibility means that there is an opportunity to optimise the housing potential of development sites, subject to other considerations especially the potential impact on the historic environment. The overriding need for new housing locally has been highlighted above. Consequently, the density matrix set out below (from the London Plan 2016) is considered generally appropriate for the Harlesden area, apart from development at Willesden Junction station for the reasons set out in paragraph 6.24, and the Forum wishes to see new housing developed at a density at the upper end of the range. (NB. the Public Transport Accessibility Level (PTAL) is a scale for how close a home is to public transport options. The PTAL level for homes in the Harlesden Neighbourhood Plan Area is predominantly between 2 and 6a. PTAL is a relative measure commonly used in London).

Setting	Public Transport Accessibility Level (PTAL)		
	0 to 1	2 to 3	4 to 6
Suburban	150–200 hr/ha	150–250 hr/ha	200–350 hr/ha
3.8–4.6 hr/unit	35–55 u/ha	35–65 u/ha	45–90 u/ha
3.1–3.7 hr/unit	40–65 u/ha	40–80 u/ha	55–115 u/ha
2.7–3.0 hr/unit	50–75 u/ha	50–95 u/ha	70–130 u/ha
Urban	150–250 hr/ha	200–450 hr/ha	200–700 hr/ha
3.8–4.6 hr/unit	35–65 u/ha	45–120 u/ha	45–185 u/ha
3.1–3.7 hr/unit	40–80 u/ha	55–145 u/ha	55–225 u/ha
2.7–3.0 hr/unit	50–95 u/ha	70–170 u/ha	70–260 u/ha
Central	150–300 hr/ha	300–650 hr/ha	650–1100 hr/ha
3.8–4.6 hr/unit	35–80 u/ha	65–170 u/ha	140–290 u/ha
3.1–3.7 hr/unit	40–100 u/ha	80–210 u/ha	175–355 u/ha
2.7–3.0 hr/unit	50–110 u/ha	100–240 u/ha	215–405 u/ha

Ha = Hectare U = Unit Hr = Habitable rooms

Appropriate density ranges are related to setting in terms of location, existing building form and massing, and the index of public transport accessibility (PTAL). The setting can be defined as:

Central – areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an International, Metropolitan or Major town centre.

Urban – areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 metres walking distance of a District centre or, along main arterial routes

Suburban – areas with predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically buildings of two to three storeys.

Fig.7 Housing density matrix relevant to Harlesden (from 2016 London Plan)

- 6.25. Old Oak and Park Royal is an Opportunity Area in the London Plan. As the Mayor’s SPG on Housing, 2016 states in paragraph 7.5.8, densities in Opportunity Areas and on other large sites may exceed the relevant density ranges in Table 3.2 of the London Plan, subject to development achieving the highest standards in terms of residential and environmental quality.²³ OPDC policy on density is set out in the Local Plan with high density development that responds to the surrounding context envisaged at Willesden Junction Station. This proposes that high density development will be delivered to the south of Willesden Junction Station.

²³ Available at https://www.london.gov.uk/sites/default/files/housing_spg_revised.pdf

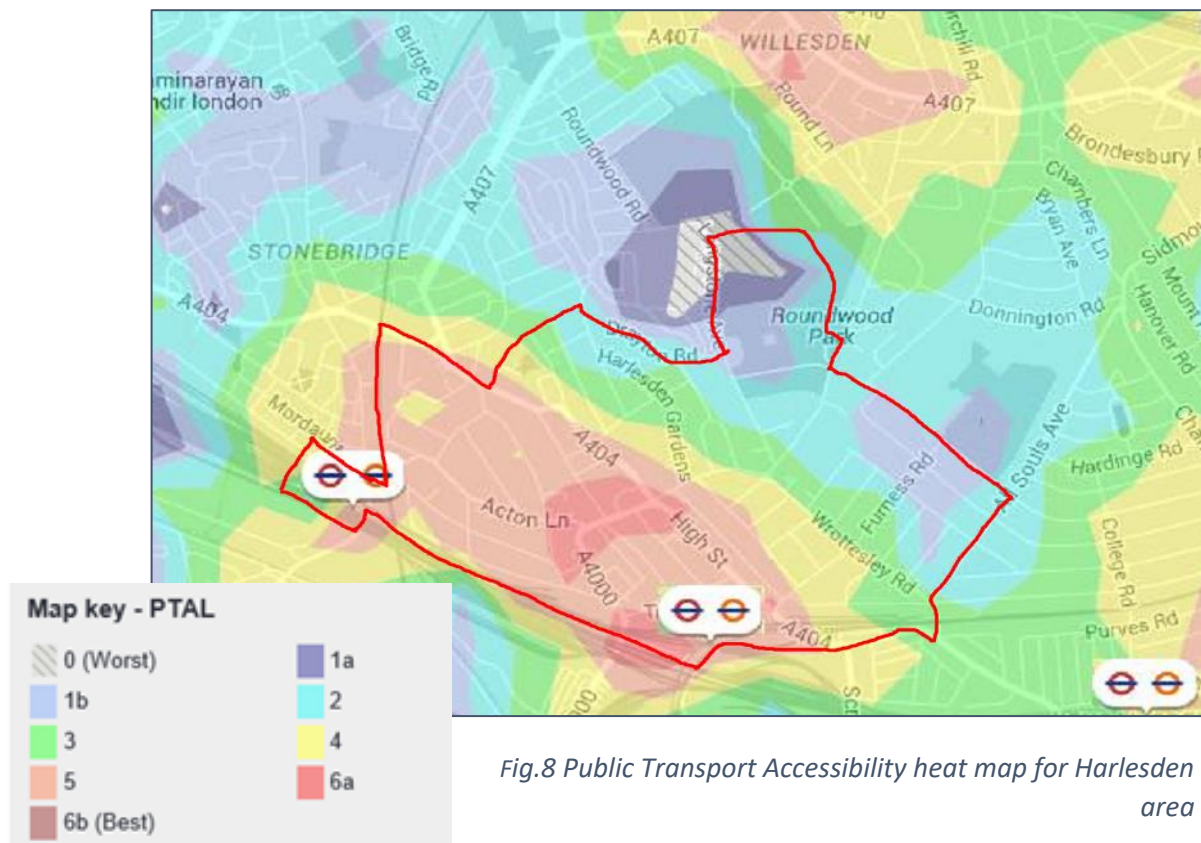


Fig.8 Public Transport Accessibility heat map for Harlesden area

- 6.26. The plan above shows PTAL levels as of 2015. Again, the PTAL level for homes in the Harlesden Neighbourhood Plan Area is predominantly between 2 and 6a. These levels are likely to improve in the southern part of the area in the longer term with the planned upgrades to Willesden Junction station and the potential for new bus routes and greater frequency along existing routes.

Policy H2 – New housing density

Density of new housing development should be optimised taking account of the development site's connectivity and accessibility and subject to the proposals being acceptable in terms of local context and design. Density at Willesden Junction will be determined in the OPDC's Local Plan.

Affordable Housing

- 6.27. Policy for affordable housing is primarily set by the London Plan policies 3.10 – 3.13, although there is also specific Brent Council policy for affordable housing set out in the Core Strategy. No specific provision target is set in the London Plan for affordable housing with policy stating that this should be maximised. Nevertheless, the Mayor of London set out in a new Supplementary Planning Guidance note, called ‘Homes for Londoners Affordable Housing & Viability’, published in August 2017, a clear long-term strategic aim for 50 per cent of new homes to be affordable.²⁴ Brent has a target that 50% of new housing should be affordable.
- 6.28. For individual market-led housing schemes the level of affordable housing is determined by a viability test as to what would represent a maximum reasonable affordable housing provision on a particular site. Affordable housing is sought on sites capable of providing 10 or more units. Brent policy is that 70% of new housing that is designated as ‘affordable’ (80% or less than market rates) should be social housing/affordable rented and 30% of it should be intermediate housing. This ratio has been backed up by the recent SHMA produced for Brent.
- 6.29. Brent’s Development Management Policies states in policy DMP 15 that “where a reduction to affordable housing obligations is sought on economic viability grounds, developers should provide a development appraisal to demonstrate that schemes are maximising affordable housing output”²⁵. The Forum supports this approach to affordable housing proposals.
- 6.30. The OPDC draft Local Plan was submitted for Examination in October 2018. This requires that affordable housing should be provided in accordance with the overarching 50% target, and that 30% of affordable housing should be London Affordable Rent and 70% a range of Intermediate housing²⁶.
- 6.31. At any particular time, the financial viability of individual housing schemes is dependent upon the state of the housing market, which itself is dependent upon national economic circumstances. Nevertheless, there needs to be a target for affordable housing provision that applies to all housing schemes and only where a financial viability assessment demonstrates a legitimate and verifiable justification for a different percentage/tenure mix should a lower level of affordable housing provision be acceptable. Brent’s policy target that 50% of new housing should be affordable is appropriate for Harlesden, as is the policy that 70% of this should be social/affordable rented and 30% intermediate housing.

²⁴ Available at https://www.london.gov.uk/sites/default/files/ah_viability_spg_20170816.pdf accessed April 2019

²⁵ Available at <https://www.brent.gov.uk/services-for-residents/planning-and-building-control/planning-policy/local-plan/development-management-policies/> , accessed March 2019

²⁶ OPDC Local Plan Second Revised Draft for Regulation 19 (2), Chapter 8, available at https://www.london.gov.uk/sites/default/files/kd1_opdc_local_plan_and_appendix2018.pdf accessed April 2019

- 6.32. The threshold at which affordable housing is required is currently set at 10 units in the London Plan, in Brent's Local Plan and in the OPDC's revised draft Local Plan 2017. There is little prospect of lowering this in the short term, which could have led to a modest increase in the number of affordable homes built locally. Within Harlesden there is a lack of large sites to deliver housing but there are likely to be smaller scale opportunities to bring forward new housing. Unfortunately, affordable housing can be required only on the larger sites.

Community Aspiration 1 – Old Oak affordable homes

The Neighbourhood Forum will continue to liaise with the OPDC to try to secure a proportion of the affordable homes delivered at Old Oak are for those in need in the Harlesden area.

Community Aspiration 2 – Affordable housing

The Forum recognises that policy for affordable housing in the London Plan as well as policy DMP 15 of Brent's Local Plan (and ultimately emerging policy in the OPDC Local Plan) will apply to development proposals for housing in the Neighbourhood Plan Area. In order to contribute fully to meeting the levels of need identified for Harlesden, the Forum wishes to see the level of affordable housing provided on individual sites maximised.

Community-led Housing

- 6.33. Community-led housing can be defined as housing shaped and controlled by a group that represents residents and/or the wider community that will be served by the housing. This broad definition can include the following:
- Community land trusts – not for profit community-based organisations, run by volunteers, to hold and manage land, and enable the development of housing for low cost sale or rent;
 - Co-operative housing organisations (also called housing co-ops);
 - Cohousing projects – communities created and cared for by their residents;
 - Self-help housing – a broad term used to describe a range of different modes of community organisation.
- 6.34. Community-led housing can provide a community self-help response to tackling the shortage of affordable housing. Setting up a community land trust for Harlesden might be a way to encourage local landowners (such as public bodies) to consider making land available for the provision of affordable housing or other community facilities. It is, however, contingent on appropriate land being available for development.

Community Aspiration 3 – Harlesden Community Land Trust

The Forum will investigate with key community stakeholders whether there is any commitment towards, and the likelihood of available site(s) for the promotion of, a community land trust for Harlesden.

Size of New Homes

- 6.35. Harlesden showed extremely high rates of one room household growth between 2001 and 2011 as well as very high rates of two to five room household growth. There was also an increase of 43% in 1-person households from 2001 – 2011 (Census 2011). This points to a growing need for affordable accommodation for single people. At the same time, extremely high rates of overcrowding have been identified (see paragraph 4.2 above) which suggests that larger properties are needed.
- 6.36. Brent, in its Core Strategy, has identified a particular need for the provision of family sized dwellings but also that the very diverse population means that it has a corresponding need for a wide range of accommodation sizes and types. This also applies within Harlesden therefore it is appropriate that Brent's policy CP2 in the Core Strategy, which requires at least 25% of new housing to be family sized (3 bedrooms or more), be applied to the Harlesden Neighbourhood Plan Area.

Loss of Housing

- 6.37. London Plan and Brent Local Plan policy is that there should be no loss of housing unless replacement housing is provided on redevelopment. This policy should apply across the Harlesden Neighbourhood Plan Area with one exception and that is along parts of Station Road from Willesden Junction station north towards the town centre. This stretch of street frontage is designated as part of Harlesden town centre in Brent's recently adopted Development Management Policies document and much of it is commercial currently. However, there are parades of shops where some conversions to residential have taken

*Fig. 9
Station
Road
shopping
parade*



place on the ground floor. It is these ground floor properties that it is considered would be appropriately returned to town centre uses so that the aim of extending the town centre to Willesden Junction station and enhancing linkages with the new regeneration area at Old Oak can be achieved (See Fig.3 - Brent policy map, where the Station Road shopping parade is marked in light blue).

Policy H3 – Housing floorspace retention

A net loss of housing floorspace will not be acceptable in Harlesden apart from the ground floor properties in Station Road. These form part of an existing shopping parade which has been designated as part of Harlesden Town Centre by Brent. As such, the proposed use is appropriate within a town centre as it provides active frontage. Residential units above should be retained.

7. COMMUNITY FACILITIES

Introduction

- 7.1. All communities need social infrastructure, such as leisure facilities, children's nurseries, schools, health facilities, public libraries, places of worship and general community meeting space, to support them. It is particularly important that a growing population is provided with additional facilities. Research has shown that residents need local social networks and shared community experiences to build a sense of belonging and identity (DCLG, 2006)²⁷.
- 7.2. Harlesden is relatively well provided with, or at least within reasonable distance of, leisure and sports facilities. Willesden Sports Centre is less than 1 mile from the centre of Harlesden and no part of the area is more than 1 mile from either Bridge Park or Willesden sports centres. There is also a large, modern youth facility on the edge of Roundwood Park. The Roundwood Youth Centre, is for young people aged 13 to 19 and has facilities such as performance area, dance studio, café, etc.
- 7.3. Demand for school places in the area, particularly primary school places, has risen due to an increased child population²⁸. This increase in population is working its way through the school system; while Brent primary school provision is now adequate and Harlesden Primary School has recently expanded, but the pressure is moving on to secondary school provision. Brent Council and the OPDC are in the best position to plan for school provision so it is not considered appropriate for the Neighbourhood Plan to deal with this.
- 7.4. The local planning authorities also either have appropriate policies in place for dealing with the development of health facilities or, in the case of OPDC, are bringing policies forward. Policy CP15 of Brent's Core Strategy deals with the need to provide infrastructure to support new development. The London Plan and Brent's Core Strategy include policies that protect existing community facilities from development or seek replacement space if redeveloped.
- 7.5. There is no doubt that Harlesden residents enjoy meeting in communities, e.g. as shown in the number of churches. Whilst there is no specifically designed "community centre", various cafes, barbers, and convenience stores act as community centres – places to meet and connect as well as places of business. However, there are strong feelings, locally expressed during consultation, that there is insufficient community meeting space in Harlesden.

Community Space

- 7.6. The need for additional space is borne out by an assessment of space that currently exists when measured against Brent's standards of provision for new development. Brent policy is that new multi-functional community facilities (excluding health, schools & leisure

²⁷ Transferable Lessons from the New Towns report, Department for Communities and Local Government 2006, inc. Table 5.3 Lessons on Community. Available at <https://webarchive.nationalarchives.gov.uk/20120920022741/http://www.communities.gov.uk/documents/housing/pdf/151717.pdf>

²⁸ Brent JSNA Children and Young People report 2015. Available at <https://data.brent.gov.uk/dataset/jsna-2015---children-and-young-people? ga=2.182748130.510930939.1551792006-153856619.1504187846> accessed April 2019

facilities) should be provided at a rate of 370m² per 1000 new population. At this rate of provision 7,000 m² of space is needed to meet the needs of the areas existing population. Places of worship / church halls currently provide about 5,000m² (approx.) of community space, therefore there is a current deficit of 2,000m².

- 7.7. The meeting space that does exist is mainly faith-based space, i.e. churches or halls associated with religious institutions, or in licensed premises. These existing facilities are valuable spaces, are often separate from the places of worship themselves and are offered for use by the local community. They are generally well used for a variety of purposes, especially the more central facilities such as Tavistock Hall, Salvation Army and All Souls. However, some may benefit from improvement to ensure they better meet local needs. Views have been expressed also that there is a need for inclusive space for meetings and where all the local community can feel able to drop in, congregate and meet. A survey undertaken in the High Street in January 2016, on behalf of Crisis Skylight Brent, found support for the provision of additional community space in Harlesden.



Fig.10 Tavistock Hall

- 7.8. In light of the above, and a clear need for additional space to be provided, it is considered that it would be appropriate to seek additional good, flexible space that meets the needs of the wider community on development or redevelopment of a site within or close to the town centre. Consequently, community space is sought on redevelopment of the Harlesden Plaza site and, if implemented, will be delivered via a Section 106 planning obligation and/or neighbourhood CIL funding. If this is not possible then part of any CIL funds available for the area should be put towards the provision of additional community space elsewhere. There is currently more than one potential site within the town centre that could meet this need.

Policy CF1 – Community space provision

Harlesden Plaza has been identified as a development site where space for the community can be provided on development / redevelopment. If this site is not brought forward for development then Community Infrastructure Levy (CIL) funds, if and when available, will be targeted for the provision of new community space and/or improvement of existing ones.

- 7.9. There is also the possibility of acquiring existing premises for a community facility which could be run by the local community. It is noted that Brent Council is currently testing a 'prototype' community hub in Harlesden town centre and this is welcomed by the Forum. The Forum will continue to engage with the council and Crisis Skylight Brent as key partners to explore options for securing community space.

- 7.10. Challenge House on the High Street, currently owned by Brent Council and used as a children's centre, has the potential, should it become available, to be converted into a community hub. It is ideally located in the heart of the town centre and has been established in community use for a long time. Consequently, the Forum will ask Brent Council to include Challenge House in their list of community assets and will seek to acquire it if it becomes available.

Public Houses

- 7.11. It is also apparent that there are concerns locally to protect certain public houses because they are considered to be community assets, acting as focal points for the wider community. Policy was introduced at national level in the NPPF which recognised pubs as community facilities and said that policies "should guard against the unnecessary loss of valued facilities and services". Brent's Local Plan includes policy DMP21



Fig.11. Royal Oak Pub

to protect some public houses. Policy will only permit their loss on development if certain criteria are met, including if registered as a community asset that it has been offered for sale to the local community and no credible offer has been received or its continued use is not economically viable. There are a number of public houses within Harlesden, not all of which have meeting space within them and not all of which are considered of value to the local community. The pubs that are considered to be community assets, and will be nominated by the Forum to be added to the list, are:

- Royal Oak, 95 High Street
- Harlesden Picture Palace, 26 Manor Park Road
- Le Junction, 47 Station Road
- The Shawl, 25 High Street

These pubs are considered to be local assets primarily because they include either performance space or meeting space within them.

Community Aspiration 4 – Assets of Community Value

The Forum will nominate the following as Assets of Community Value:

- Challenge House, 1-2 Bank Buildings, Craven Park Road
- Royal Oak, 95 High Street
- Harlesden Picture Palace, 26 Manor Park Road
- Le Junction, 47 Station Road
- The Shawl, 25 High Street

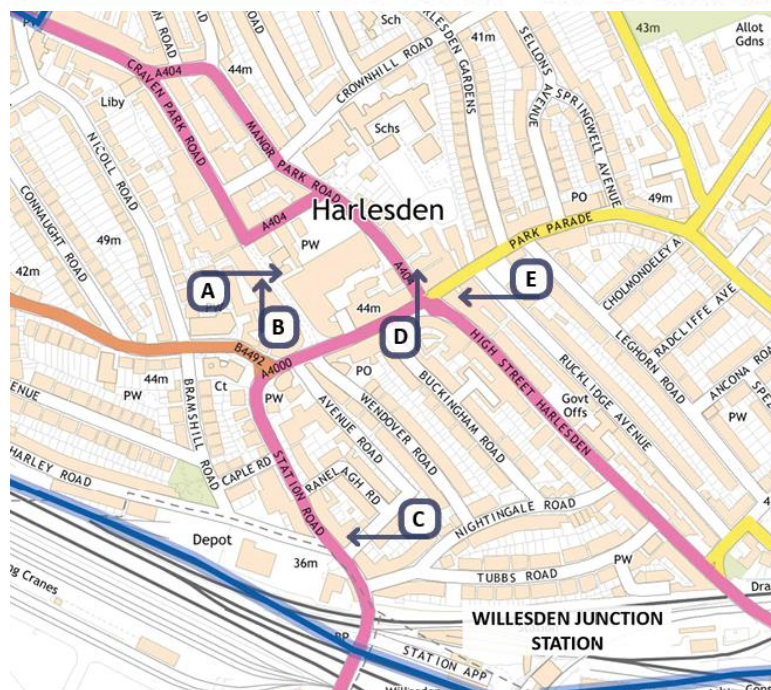


Fig.12.
Proposed
community
assets

8. ENVIRONMENT AND OPEN SPACE

Introduction

8.1. One of the priorities of the neighbourhood plan is to improve the environment by making improvements to the street scene, greening the environment generally and improving local people's access to open space. In this way the local community will benefit as well as improving the perception of the area to visitors and those passing through.

8.2. Harlesden has a number of environmental assets and a number of long-established voluntary groups dedicated to preserving these assets, such as HEART and Kensal Green Streets. Harlesden has distinctive heritage in the form of several listed buildings and structures, a conservation area and part of the centre is an archaeological priority area. The north-east



Fig.13.
Connaught
Road

of the area also has good access to Roundwood Park, which is registered as Grade II on Historic England's 'Register of Historic Parks and Gardens of special historic interest'. It also has a Green Flag award and boasts a variety of facilities, such as a large play

area, as well as a wildlife area. There are also a number of good tree-lined residential roads with attractive streetscape. However, most of the Neighbourhood Plan Area has very poor access to open space and suffers from a lack of street greenery. There is scope for substantial improvement.

Open Space

8.3. Guidelines for the provision of open space are provided by Fields in Trust.²⁹ In terms of quantity, there are guidelines for formal outdoor space such as playing pitches and play areas and guidelines for informal outdoor space such as parks and gardens. Clearly it cannot be expected that the pitch requirements be provided within the area but play areas and parks & gardens should be. In considering the space requirements, Harlesden needs a total of 15h for parks and gardens and another 10h for play space. Additionally, London Plan table 7.2 shows open space categories and deficiency can be assessed against these. The accompanying map shows local open space deficiency in Harlesden based on the London Plan deficiency definition of a distance of over 400 m from a public open space of at least 2 hectares.

²⁹ Available at <https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/get-involved-o--8> , accessed March 2019

Fig.14. Public Open Space accessibility map



Source: Brent Open Space Report: PPG 17 Assessment



- 8.4. Roundwood Park is about 15 hectares but serves a much wider catchment than just Harlesden and is within a reasonable walking distance of less than half the area's residents. There are 3 small areas of open space in the rest of the Neighbourhood Plan Area amounting to only 0.7h.
- 8.5. The map (Fig.14) above demonstrates that the north-eastern part of the Neighbourhood Plan Area is well served by Roundwood Park whilst the rest of the area to the south and west is very deficient in open space. This area of deficiency includes the area to the south of the Brent borough boundary shown as blank on the diagram above. Clearly the area can ill afford to lose any of the existing open space and opportunities should be taken to provide additional open space in the deficiency areas where possible. Brent's Core Strategy includes a policy which protects open space of local value from inappropriate development. There is only likely to be an opportunity to provide any additional public open space on the development of large sites. The draft OPDC Local Plan seeks to deliver a new Willesden Junction Station Square alongside a range of publicly accessible open spaces within the place of Willesden Junction.

Policy E1 – Public open space provision

The provision of new public open space will be sought within the area deficient in local open space on the development of sites over 0.5 hectares (see map in Fig. 14 in the Plan which defines this area including the area to the south of the Brent borough boundary shown as blank).

- 8.6. Given the lack of opportunities to provide new open space, it is reasonable that some of any CIL funds that are available locally goes towards the improvement of existing open space. The space at the southern end of Roundwood Park Annexe is underused and could provide better recreational facilities for the local community, either through the provision of sports pitches or more informal recreational space.

Community Aspiration 5 – Roundwood Park recreation space

The Forum will work with local environmental and community groups to press Brent Council to improve the southern part of Roundwood Park Annexe either through the provision of sports pitches or more informal recreational space.

Food Growing

- 8.7. A scheme has been recently implemented to grow food in Harlesden, called Harlesden Town Garden located at Challenge Close, and it has proved to be very popular and oversubscribed. Local food growing supports healthy living and has environmental and community benefits. There are a few allotment plots within the Neighbourhood Plan Area at Roundwood Park but these are all taken. Further provision for food growing will be encouraged in appropriate locations should opportunities arise.

Policy E2 – Food growing space provision

Local food growing will be promoted by encouraging major new residential development to include space for residents to grow their own food.

Play Space

- 8.8. Harlesden's child population is slightly higher than the Brent and London averages. Under 5s comprise 9% of the total population compared to 7% in Brent and London whilst 5 -19 year olds are 19% of the population compared to 18% for Brent and 17% for London.³⁰
- 8.9. Although it is over 5 years since play provision in Brent was quantified and deficiencies assessed, the lack of new provision locally in Harlesden in recent years means that there continues to be a shortage of children's play space in the area^{31,32}. With few opportunities to provide new open space, alternative ways of providing for children's play should be explored. The area identified as deficient in local open space more than 400 metres from a public play space should be prioritised for any new provision.
- 8.10. Brent's Place Making Guide provides good advice for the management and development of the street environment.³³ It states that 'Local streets and spaces should be safe and secure, and conditions must be provided where parents can allow their children to play safely outside of the home and explore their local surroundings'. It goes on to say that 'the principles of inclusive design need to be followed to create streets which are accessible and used by as wide a range of people.' This is particularly important for children to be able to play. Play can be encouraged simply by reducing road danger and the dominance of traffic on our residential streets.

³⁰ 2011 Census

³¹ Brent Play Strategy 2005-2008 - available at

<https://www.brent.gov.uk/media/325145/Brent%20play%20strategy%202005-2008.pdf> accessed April 2019

³² Brent Open Space Report: PPG17 Assessment, 2009

³³ Available at <http://democracy.brent.gov.uk/documents/s4290/ens-placemaking-app.pdf> , accessed March 2019

- 8.11. There have been moves in various parts of the country to make streets safer for children to play in and a number of local authorities have implemented schemes to introduce safe play streets. Brent has a scheme to allow communities to close a residential road for three hours as often as once a month to allow children on the road to safely play outside. However, 3 hours a month is not a great deal of play time. It would be better to implement more permanent schemes to provide safe street environments for children to play. In doing so, however, it is important that the needs of all users are taken into account in making such schemes permanent (See also Transport and Access chapter.)



Fig.15. Safe street area for play or relaxation

Policy E3 – Safe play provision

Harlesden Neighbourhood Forum will consider options for implementing safer streets schemes, including areas for children's play.

The priority area for the provision of new play areas will be the area shown as deficient in local open space (See map in Fig. 14 in the Plan which defines this area including the area to the south of the Brent borough boundary shown as blank).

One of the priorities for any CIL funding in the Neighbourhood Plan Area will be for the provision of safe play space in streets.

Community Aspiration 6 – Safe play site identification

In order to bring forward safer streets schemes within Harlesden, the Forum will identify locations where schemes are appropriate and liaise with Brent Council to secure funding and implementation, working closely with local nurseries, schools and community groups.

Heritage assets

- 8.12. Today Harlesden is a busy urban neighbourhood and town centre. It owes much of its character to its historical development which is reflected in the built environment. There is much that is worthy of preservation and protection and the historic character can be a catalyst for future developments. The town has a number of Grade II listed buildings as well as buildings on the Local List, as set out in the table below.

Grade II Listed Buildings	Locally Listed Buildings
105-109 High Street All Souls Church, Station Road (Grade II*) Church of Our Lady of Willesden, Acton Lane Jubilee Clock, High Street The Green Man P.H., High Street	175 High Street 97-103 High Street RBS Bank Premises, 86 Craven Park Road Royal Oak P.H., High Street

- 8.13. In addition to its historic buildings and structures, there is an Archaeological Priority Area, one of only four in the borough of Brent. Part of the High Street is also designated as a conservation area. The special character of the Conservation Area is derived from the historic setting. It is the variety of different styles along the relatively short section of road which give it a distinctive character with a traditional appeal. Planning policies for these the listed buildings, Conservation Area and the Archaeological Priority Area are included in the London Plan and the Brent and OPDC Local Plans.



Fig.16.
Harlesden
Conservation
Area

- 8.14. The Listed Buildings are supported by Harlesden Neighbourhood Forum. However, the Forum considers a number of additional buildings/structures worthy of protection as heritage assets and has identified them as non-designated heritage assets to which regard should be had in the determination of relevant planning applications. The features which it is considered make them worthy for inclusion are described in the table overleaf. Please also see a map of the sites and a selection of images after the table.

Policy E4 – Non-designated heritage assets

The following buildings / features are identified as non-designated heritage assets that should be subject to relevant London Plan and Brent Local Plan policy:

- St Margaret's & St George's, 67 Craven Park Road
- Harlesden Branch Library, Craven Park Road
- Harlesden Baptist Church, 27 Acton Lane
- The Shawl pub, 27 High Street
- All Souls Church Vicarage, 3 Station Road
- Postal Delivery Office, Station Road
- Vacant HSBC building, 60 High Street
- Le Junction pub, 47 Station Road
- Public art (The Workers) at junction of Rucklidge Avenue & Park Parade
- Church of God of Prophecy, Tubbs Road

Proposed Non-Designated Heritage Assets information³⁴

Public art (The Workers) at junction of Rucklidge Avenue & Park Parade	Sculpture by Kevin Harrison commissioned by Harlesden City Challenge in 1995, which has become a well-liked feature in the town.
Harlesden Baptist Church, 27 Acton Lane	Very attractive 1890 Baptist Church with a tower and spire on the side. Huge rose window, constructed of red brick and stone dressings. Unusual mixture of decorative gothic and early English. Landmark building.
Harlesden Branch Library, Craven Park Road	1893 by John Cash. Solid, red brick, with brick and stone dressings. Detailed with one large Dutch gable (featuring a stone crest) and two smaller gables to the return.
St Margaret's & St Georges, 67 Craven Park Road	Built as a Presbyterian church in 1876 by Thomas Arnold. Red brick with stone dressing in the decorated gothic style. Detailed with clock, finial and buttresses.
All Souls Church Vicarage, 3 Station Road	1894 vicarage in the eclectic arts and crafts style featuring tile hanging, tall chimneys, bay windows and brick dentils.
Church of God of Prophecy, Tubbs Road	Former Edwardian United Methodist church and Sunday school. Red brick and stone dressings, buttresses and railings. Landmark building. Sunday school in painted brick with perpendicular windows.
Le Junction, 47 Station Road	Former Willesden Junction Arms. Substantial corner pub with projecting granite portico and granite pilasters. Continuous decorative metal balconette to first floor. Upper windows feature curved pediments and brackets.
Postal Delivery Office, Station Road	1897 single storey, brick built, former post and sorting office, featuring two large set-back gables facing the road. Large shouldered arched window to exposed gable topped with the Royal Cypher of Queen Elizabeth II. Single storey entrance block with brick pierced parapet and stone entrance surround – complete with boundary wall, railings and post box.
The Shawl, 27 High Street	Although now a public house, the building is one of the oldest in Harlesden and was originally a Chapel of Ease. Its foundation stone dates the chapel at 1869, pre-dating the rapid development of Harlesden after 1880.
The vacant HSBC Building, 60 High Street	This c.1925 corner building, constructed in Portland stone with several decorative features and detailing, sits on the site of a former butchers but has always been a bank until closing recently. The building is virtually unaltered, with the original timber sash and metal frame windows remaining.

³⁴ Full details of the significance of these sites are available on www.HarlesdenNeighbourhoodForum.com



Fig.17. Proposed
Non-Designated
Heritage Assets

Public Realm

- 8.15. The public realm is defined as all the spaces between buildings to which the public has access. The Brent Placemaking guide states that: ‘a well-designed and high quality public realm is essential to creating good places and strong communities....’. There has long been a sense locally that the public realm in Harlesden should be improved and various initiatives, dating from City Challenge in the 1990’s up to the production of the Harlesden Town Charter in 2010, have recognised this.³⁵ The Town Charter emphasised the need to improve the appearance of the place as its quality has been eroded over the years. Harlesden requires a safe, connected and inclusive public realm which reduces the need for physical barriers for pedestrians and cyclists (see Transport and Access chapter).

Town Square

- 8.16. The Town Charter is particularly concerned with the lack of public spaces. It concluded that “there is no heart to the community, no civic space, no place to celebrate in”. The environment within the town centre has improved with the recent implementation of the town centre traffic scheme which resulted in the provision of a shared surface, creating a better pedestrian environment north along the High Street from the Jubilee Clock. Nevertheless, there is still no “heart to the community”. The viability of a potential development proposal, including a town square, for this site has been assessed and found to be financially feasible³⁶.
- 8.17. There may be an opportunity, if there were to be a development / redevelopment based on the town centre car park – at Harlesden Plaza - to create a public space or town square which could act as a heart to the community (see also Transport and Access chapter). This, together with the provision of community space (see Community Facilities chapter), could provide a real sense of place for Harlesden residents and for visitors to the town. The only opportunity to provide a space within the town centre where people can gather and relax in the open air free from traffic is at Harlesden Plaza (within the existing town centre car park in front of the Tesco store). (NB. As described in other parts of this document, housing and the re-provision of commercial space, are also included in the vision for this site. Please see the indicative images in Figs. 17-21 below and also Chapter 6 – Housing, Chapter 11 Site Allocation 1 and Chapter 12 - Design Principles).

Policy E5 – New town square

The provision of a town square will be sought on development / redevelopment of the town centre car park and adjacent properties, also known as Harlesden Plaza. This should be a minimum of 800 m2 in area. (Please see indicative images in Figs. 18-22 in the Plan and Chapter 11 ‘Site Allocation 1’ for more on this site)

³⁵ Available at [https://www.brent.gov.uk/media/478876/town%20charter%20final%20web%20version\[1\].pdf](https://www.brent.gov.uk/media/478876/town%20charter%20final%20web%20version[1].pdf) , accessed March 2019

³⁶ This assessment can be found on the Harlesden Neighbourhood Forum website www.harlesdenneighbourhoodforum.com



Fig.18. Preferred location for a new town square at Harlesden Plaza (Source: Google Earth)



Fig.19. Example illustration of a town square

Fig.20. Right, Example view of how Harlesden town square could be laid out



Fig.21. Below, Example diagram of how Harlesden town square could be laid out, including proposed ground-floor uses



03 August 2017

1:1000

0 10 20 metres



Brent

Fig.22 a, b and c. Example images of how Harlesden town square could look and be used



Gateways

- 8.18. Gateways are the places that act as the first welcome point into Harlesden. They should provide a recognisable point of entry for those arriving by whatever means, be it on foot or by bicycle, car or public transport. The design of buildings and the public realm should reinforce the role of these gateways (See also Design Principles chapter.)
- 8.19. The Town Centre Charter identified the principal gateways for Harlesden as follows:
- Station Road at Willesden Junction station.
 - Craven Park Road at Fortune Gate Road.
 - High Street Harlesden at the steps on to Harrow Road footpath.
 - Other gateways are considered to be Acton Lane at Harlesden tube station and Park Parade at Harlesden Road.

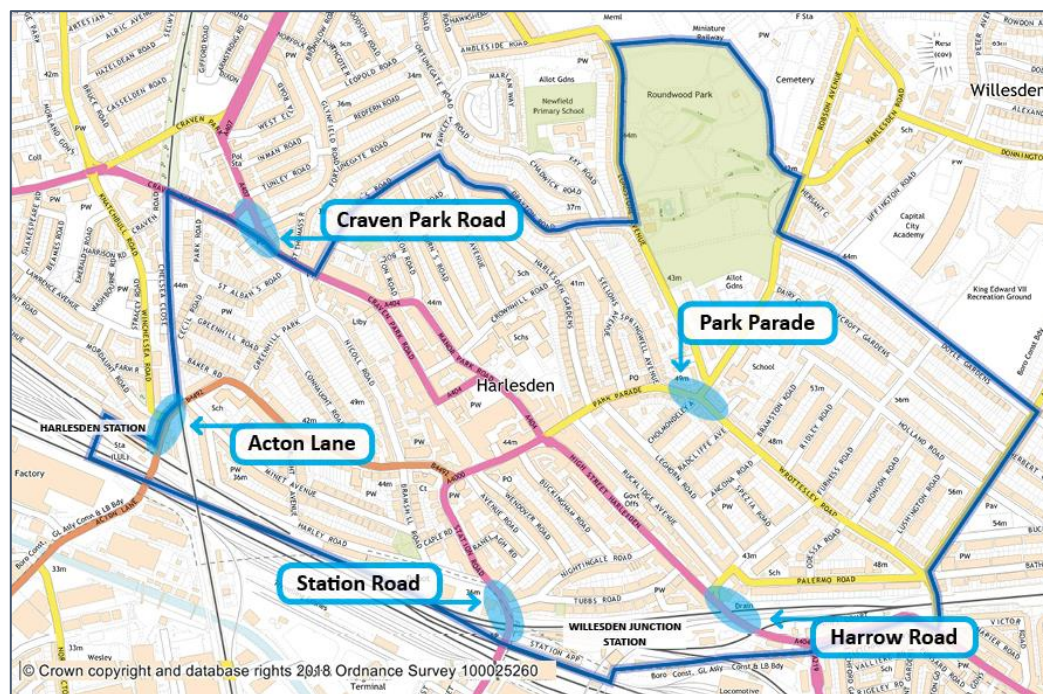


Fig.23. Principal gateways to Harlesden

- 8.20. Investment in the public realm and appropriate design of development at these entry points is important as they provide important links into Harlesden and link to surrounding areas. The most important of these is Station Road which not only provides the main gateway into Harlesden from public transport but will link through Willesden Junction station to the major new regeneration area at Old Oak. The Transport and Access chapter of this Plan addresses the need for good access to and from Willesden Junction station and links to the new development at Old Oak.
- 8.21. The gateway at Willesden Junction/Station Road is currently unwelcoming with poor legibility and environmental conditions, primarily because of the bus depot on the west side of Station Road. The OPDC Industrial Land Review describes the depot as having a high environmental impact. Not only is it visually unattractive and causes a lengthy break in the active street frontage, it also disruptive because of buses accessing and exiting the site. Unfortunately, it is not an option to provide alternative access to the site other than from

Station Road. If Station Road is to provide an attractive and welcoming gateway into Harlesden then the ideal solution is for the depot to be relocated and for there to be development on the frontage. Active frontages along Station Road will provide a better experience for visitors to the area (see Local Economy chapter). Additional examples of quality development include design that enhances or reflects local character (see Design Principles chapter), the inclusion of green elements, the standard of materials used etc.



Fig.24. Harlesden gateway at Station Road

Policy E6 – Quality gateways to Harlesden

Development at gateways will be expected to add to the sense of arrival at Harlesden. The quality of development at gateways, and along main routes into the centre from them, will be given significant weight when considering planning applications. CIL funding will be directed towards public realm improvements at the principal gateways.

Public Art

- 8.22. Public art can play an important role in the creation of attractive and distinctive places and spaces. Public art promotes local identity, and can instil civic pride as well as adding interest to the street environment
- 8.23. A number of pieces of public art were introduced into Harlesden as part of the City Challenge initiative in the 1990s but most have been lost over the last few years either destroyed, for example at the junction of Scrubs Lane and Harrow Road which was removed on redevelopment, or stolen. It is therefore proposed that works of public art be re-instated in Harlesden.
- 8.24. London Plan policy 7.5 on the Public Realm states that 'opportunities for the integration of high quality public art should be considered' on development. Where appropriate, the provision of public art will be achieved through Section 106 agreement.

Policy E7 – Public art provision

The provision of public art will be sought on the development of key, large sites in the town centre. In particular, the design of new on-site open space should include a place for public art.

Biodiversity

- 8.25. Within the Neighbourhood Plan Area, the biodiversity assets designated by Brent and shown on the policies map are a Site of Importance for Nature Conservation (SINC) at Roundwood Park and wildlife corridors along railway lines. The Mayor of London expects biodiversity and natural heritage to be conserved and enhanced. London Plan policy states that *“Development Proposals should...wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity”*.

Trees

- 8.26. Within the Neighbourhood Plan Area, as well as applying London Plan policy to biodiversity generally and to the retention of existing trees of value, the Forum wishes to see the planting of new trees
- 8.27. It is realistic to provide new areas of public open space only on development or redevelopment of large sites. Given the lack of breaks in the urban environment, and of opportunities to provide new ones, greening of streets through tree planting is a way of improving the environment of the area. As well as improving the visual attractiveness of streets, trees help to mitigate the effects of climate change. Trees also reduce pollution and the impacts of pollution on health. Trees can act as both a visual and an acoustic barrier, softening the hard edges of the built form, screening residential properties from road traffic and absorbing traffic noise. It is also accepted that it is important to continue removing and replacing existing trees where these may be causing a nuisance or result in excessive maintenance.
- 8.28. London Plan policy for development is that existing trees of value should be retained and any loss as the result of development should be replaced following the principle of ‘right place, right tree’.
- 8.29. Some funding is available from Brent council to plant trees across the borough and Brent’s Infrastructure (Reg 123) List specifically refers to street trees to be funded by CIL funding.³⁷ The densely developed nature of Harlesden and the lack of access to open space and of opportunities to provide new open space mean that the area should be considered as a priority for new street trees within Brent. The Neighbourhood Forum will propose priority streets within Harlesden for the planting of trees and will also prioritise any CIL funding available for the area for tree planting. Tree preservation orders to protect trees of high amenity value, particularly where trees are at risk from development, are made by local authorities.

³⁷ Available at <https://www.brent.gov.uk/media/9327686/LBB-CIL-Infrastructure-Reg%20123-List.pdf> ,. accessed March 2019

Policy E8 – Tree provision

There should be appropriate mitigation for the loss of trees on development, including a contribution towards the planting of new street trees locally if new trees cannot be provided on site.

One of the priorities for any CIL funding in the Neighbourhood Plan area will be for the provision of new street trees.

Tall Buildings

- 8.30. Tall buildings are those that are substantially taller than their surroundings or cause a significant change to the skyline. They can optimise the use of sites and are particularly appropriate where public transport accessibility is very good. However, they can also be imposing and have a harmful effect on local character, particularly if close to low rise residential areas.
- 8.31. London Plan policy sets out a number of criteria for determining whether proposals for tall and large buildings are acceptable, such as where they are generally appropriate including opportunity areas or town centres that have good access to public transport. Brent Council, in policy CP6 of its Core Strategy has identified where tall buildings are appropriate. This does not include Harlesden. Policy for the southern part of the neighbourhood plan area, however, is included in the emerging Local Plan of the OPDC and this identifies sites at and around Willesden Junction station as being appropriate for tall buildings.
- 8.32. Consequently, policy in the Neighbourhood Plan aims to direct tall buildings to the Willesden Junction station area, subject to them not having an unacceptable adverse impact upon the surroundings, especially the low-rise housing to the north, and being in accordance with policy for tall buildings in both the London Plan and the OPDC Local Plan. The draft OPDC Local Plan has been the subject of a full SEA (IIA³⁸) assessment which makes specific reference to high density at Willesden Junction.

Policy E9 – Tall buildings

Tall buildings will be acceptable at Willesden Junction station where it can be demonstrated that they will enhance local character, by responding to existing local architectural and urban design characteristics and will not have an unacceptable harmful impact on the character and appearance of their surroundings, including the residential neighbourhoods to the north of the rail tracks.

Buildings of over four storeys may be supported if they contribute favourably towards retaining the historic character of Harlesden town centre and respond appropriately to the existing urban design characteristics.

³⁸ Report (April 2017) available at www.london.gov.uk/moderngovopdc/documents/s57022/Appendix%20B%20-%20OPDC%20Local%20Plan%20Regulation%2019%20IIA%20HRA%20Reports.pdf

9. LOCAL ECONOMY

Introduction

- 9.1. This chapter deals with business and employment, including the town centre and industrial sites and premises. There is very little land devoted to industrial use in the area. The largest industrial site, at 1.5 hectares, is the Metroline bus depot just north of the railway tracks at the end of Station Road. The town centre is important to the area as a place to visit for a range of services, especially shopping, but also as the main business location and a source of most of the local employment.
- 9.2. Harlesden and Kensal Green wards have a low ratio of jobs to population. The number of jobs in the Harlesden ward for example, at 19.7% of the working age population in 2013, is very low compared to Brent and London (35% & 55% respectively)³⁹, although there are substantial job opportunities just outside the ward in Park Royal where major employers such as Car Giant (500 employees approx.) are currently located. The town centre provides most of the local employment together with the public sector, e.g. schools, health services and public transport.
- 9.3. Unemployment is generally high across the Neighbourhood Area. Harlesden ward has a particularly high proportion of people claiming Job Seekers Allowance at 8.5% in 2015, whilst the figure for Kensal Green is 5.8%. This compares to Brent at 3.5% and London at 2.6%. The proportion of working age claimants of main out of work benefits is particularly high at 28.8%, compared to 12.3% (Brent) and 11.6% (London).⁴⁰
- 9.4. Given the pressures on scarce land resources, one of the key issues is whether there is a need for new developments within the area that provide new jobs and also whether existing industrial sites that provide employment should be protected.

Industrial land

- 9.5. As indicated above, the bus depot site is the largest industrial site within the Neighbourhood Plan Area. This site is within Ealing and the OPDC area and is designated as part of the Park Royal Strategic Industrial Location (SIL). All other employment sites within the area are Local Employment Sites. There are a number of small employment premises scattered throughout the residential area whose operation often conflicts with residential amenity.
- 9.6. However, Park Royal, with an estimated 36,000 jobs (OPDC Industrial Land Review, 2015⁴¹) is on the doorstep of the Neighbourhood Plan Area to the south, and these jobs will be added to by a further 55,000 at Old Oak and another 10,000 to be created within the Park Royal estate over the next 30 years or so.

³⁹ GLA Business Register and Employment Survey, GLA Datastore, Ward Profiles and Atlas, available at <http://data.london.gov.uk/dataset/ward-profiles-and-atlas> , accessed March 2019

⁴⁰ See link above

⁴¹ Available at https://www.london.gov.uk/sites/default/files/opdc_ilr_draft_new_cover.pdf, accessed March 2019

- 9.7. Current London Plan policy is to protect SIL land for industrial use. This policy is also reflected in the draft OPDC Local Plan which not only proposes to continue to designate the bus depot site as SIL but also proposes that industrial uses be intensified upon it.

Strategic Industrial Location

- 9.8. The only land currently protected for industrial use as SIL in the area is the bus depot and adjacent land on Harley Road – ‘Willesden Junction bus garage’. The site is separated from the main area of Park Royal by over 80 metres of railway tracks but the site and its main access is also on the principal gateway to Harlesden town centre from Willesden Junction station and the south. It effectively operates as an isolated industrial site adjacent to Harlesden with residential properties adjacent on the north side of Harley Road. The OPDC Industrial Land Review (updated 2017), identifies the site as having a high impact on the environment. Residential properties along the north side of Harley Road are very close to the site and the only vehicular access and egress to the site, on Station Road, causes significant severance to pedestrian movement as well as environmental impact. The OPDC’s aspiration, expressed through the Local Plan, to integrate the regeneration at Old Oak with existing communities and the areas they live in, is severely hampered by the continued operation of the bus depot site in its current form.

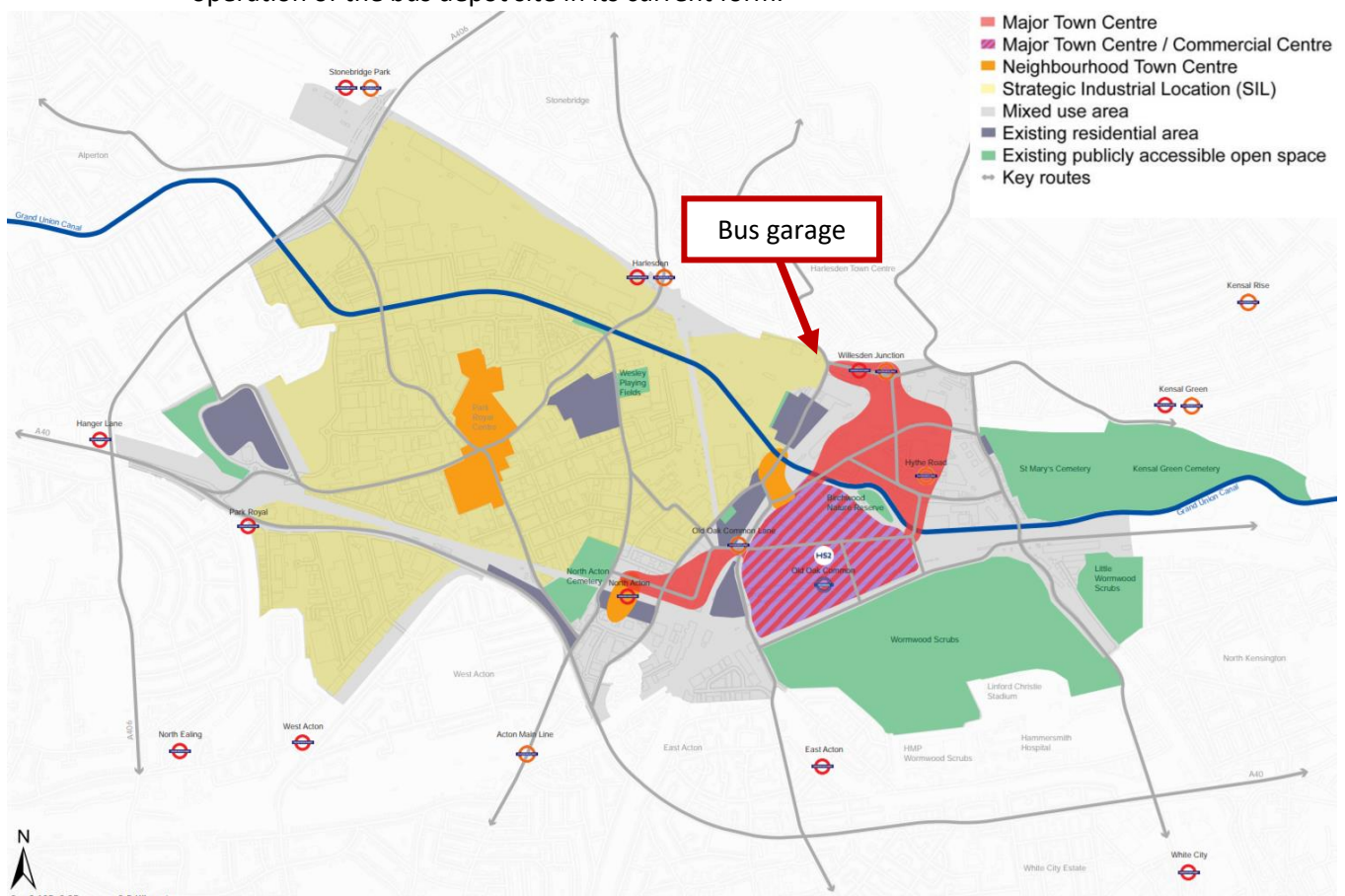


Fig.25. Diagram from July 2017 OPDC draft Local Plan showing land use, Willesden Junction bus garage site marked in red

Policy LE1 – Local employment sites

Redevelopment of Local Employment Sites for alternative use will be acceptable providing appropriate evidence is submitted to satisfactorily demonstrate that the current employment use is no longer viable and that there is no reasonable prospect of the site being used for another appropriate employment purpose; or there are significant regeneration benefits for the site. If an existing business wishes to remain in the area it should be demonstrated how applicants have worked to find suitable relocation sites or replacement premises, in the first instance, within the Harlesden area, then within the wider area.

Community Aspiration 7 – Station Road land use

The Forum will continue to engage with the OPDC to encourage a more satisfactory use of the bus depot site and adjacent land. Ideally, this would include residential, open space, and uses with active frontages on Station Road, and subject to the depot being adequately relocated.

Local Employment Sites

- 9.9. Railway land and premises around Willesden Junction station is currently designated as SIL, but this is proposed to be de-designated in the OPDC Local Plan for Old Oak and Park Royal. Other employment sites in the Neighbourhood Plan Area are classed as Local Employment Sites and are generally quite small, ranging in size from 0.05 – 0.4 hectare. One of the largest is the Royal Mail Delivery Office on Station Road / Harley Road which also causes some impact on the local area with the movement and parking of delivery vans. Local Employment

Sites are sites which comprise uses that fall in the B class of uses such as industrial or warehouse premises or offices, and are not part of Strategic Industrial Locations or Locally Significant Industrial Sites as designated by the local planning authorities.



Fig.26. Delivery vans in Harley Road/Bramshill Road

- 9.10. Brent Council's Development Management Policies document (2016), suggests that policy towards Local Employment Sites is relaxed slightly so that they will be released for other uses if it is demonstrated that employment use is no longer viable, or that significant benefits consistent with the wider objectives of the Local Plan are achieved (This is defined as evidence that the site is vacant and a thorough marketing exercise at realistic prices for the

area has been sustained over a 24 month period.). Given the urgent need for new housing and other uses to support a growing population locally, this approach is supported by the Neighbourhood Forum. However, it is obviously important to retain as many of the existing jobs as possible therefore loss of employment sites should be permitted only if any existing businesses that wish to remain in the area are successfully relocated.

Access to Jobs

- 9.11. Given that the town centre provides a large number of the jobs within Harlesden, then it is important that its vitality and viability is maintained, and where possible enhanced, so it can provide even more job opportunities. However, it is recognised that the number of jobs provided in Harlesden will be massively overshadowed by the number of new jobs (55,000) that it is planned to be delivered just beyond Willesden Junction station at Old Oak. It is essential that local people are given every opportunity to access these jobs.
- 9.12. The Neighbourhood Forum welcomes policy E5 proposed in the OPDC draft Local Plan for development proposals to be required to include a Local Employment and Training Agreement.

Community Aspiration 8 – Opportunities in OPDC area

The Forum will engage with the OPDC, Brent Council and other relevant agencies (including local charities and community groups) to assist people from Harlesden in being given opportunities to improve their skills, training and qualifications and access jobs generated in Old Oak and Park Royal.

The Town Centre

- 9.13. Harlesden town centre is categorised as a District Centre in both the London Plan and Brent's Local Plan. This means that it is mainly serving a local catchment with a range of shops and services. It's continued vitality and viability is extremely important to the local area because it not only provides necessary shops, services and employment opportunities for the local community, but it also acts as a focal point for the community. The vitality of the town centre is linked with the social as well as economic well-being of the area. Put simply, the town centre is the heart of the community. The vision for the centre is that its community focus should be strengthened and that it should cater well for the budgets and tastes of the local community by providing a diverse range of shops and services.
- 9.14. Many town centres suffer from the same problems, especially the fall in retail spending on the High Street, partly because of the increase in on-line sales, a trend that is set to continue. New, generally out-of-town centre, retail developments often have a damaging effect on town centres. Evidence shows that, nationally, whilst the retail space in out-of-town centres has continued to grow it has declined in town centres⁴².

⁴² Department for Business, Innovation and Skills Understanding High Street Performance, available at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/31824/11-1433-understanding-high-street-performance-summary.pdf Accessed March 2019

- 9.15. When the general trend of falling retail spending on the high street is accompanied by household incomes that are persistently low (compared to some neighbouring areas and Brent overall), as Harlesden has experienced, then this problem is exacerbated. There are fewer retail shops around to take up retail units so town centres have experienced a growing number of vacant units together with a growth in units being occupied by non-retail uses such as betting shops and takeaways. The recent Retail & Leisure Needs study commissioned by OPDC⁴³ found that vacancy rates in Harlesden were 11%, which is relatively high for London. A trend towards higher vacancies is borne out by a recent survey of town centre businesses undertaken by the Forum, which painted a gloomy picture of declining trade from those interviewed.



Fig.27. Harlesden in its heyday

- 9.16. In order to maintain and enhance vitality and viability in the town centre, it is important that concerted action is taken. It needs the belief and engagement of all the local stakeholders to ensure a sustainable town centre in the future. The Harlesden Town Team has come up with proposals in the past to promote improvements. Also, the Town Charter put forward a number of proposals to improve the attractiveness of the town centre, including for example the town square and shop front improvements referred to in the Environment and Open Space chapter of this Plan. The implementation of the new traffic management scheme, with the shared surface on the High Street, making it a more pleasant environment for shoppers, has also made the centre more attractive to shop in. Currently Harlesden's town centre offer reflects its diverse community which makes it distinct from other centres. This is a strength that can be built upon.



Fig.28. Harlesden High Street today

⁴³ Available at https://www.london.gov.uk/sites/default/files/old_oak_and_park_royal_leisure_and_needs_study_new_cove_r.pdf, accessed March 2019

- 9.17. However, major concerns remain about the ability of the centre to maintain vitality and viability in the face of competition from elsewhere. These concerns are reflected in the recent Retail and Leisure Needs study undertaken on behalf of the OPDC which, in referring to the preferred option of developing a new Major Centre at Old Oak, states that *“the implications of the centre’s impact on, and relationship with, Harlesden will need to be carefully understood”*.

OPDC Retail & Leisure Needs Study

- 9.18. The study is clear about what needs to be done to help ensure there is no adverse impact on Harlesden town centre from development at Old Oak and that, instead, can benefit from the regeneration. It states that

“To enable Harlesden to capture regenerative benefits from investment at Old Oak, it is critical for physical and functional linkages to be improved. If the linkages are not improved, then there is unlikely to be any significant benefit to Harlesden from development within the OPDC area and the regeneration aims in the London Plan may not materialise.”

The study goes on to say:

“The challenge will be to ensure that Harlesden properly benefits from the development. The advice from this study is that the centre should build upon its strengths as a niche retail offer and seize the opportunities delivered from the new developments at Old Oak and Park Royal to enable the centre to benefit from the additional spin-off spending to support its viability. Therefore, where feasible, improved linkages should be achieved in conjunction with committed plans to ensure that the centre is regenerated in line with the London Plan expectations.”

Expansion of the Town Centre and Improved Linkages

- 9.19. As stated in the Retail & Leisure Needs study, the improvement of linkages into Harlesden from the south is critical to the future of Harlesden. In order to facilitate this, the town centre has been expanded along Station Road to Willesden Junction station. This expansion to the boundary has been adopted in Brent’s Development Management Policies document, alongside the designation of the town centre along the High Street to Scrubs Lane, is supported by the Neighbourhood Forum. Also, important to ensuring a good link is the implementation of the improvements proposed in the Environment and Open Space chapter of this Plan relating to the gateway from the south (Policy E5), the Housing chapter dealing with change of use of ground floor premises on Station Road from residential to commercial (Policy H4) and proposals in the Transport and Access chapter relating to Willesden Junction station (Policy T1).
- 9.20. As the centre extends towards Willesden Junction station, then there may be a corresponding decline in the centre furthest away, i.e. along Craven Park Road. Rather than accepting a high level of vacant units in this part of the centre, it may be appropriate to accept the loss of shop units to other appropriate uses, including residential. Development proposals and planning decisions in this part of the town centre should have regard to the overall demand for retail space within the town centre.

Community Aspiration 9 – Town centre expansion

The Neighbourhood Forum supports the expansion of the town centre south towards Willesden Junction station and Scrubs Lane, as proposed by Brent Council and shown on Brent's policies map (See Fig. 3 in the Plan).

The Forum will also work with Harlesden businesses to engage with the OPDC and Brent Council to help ensure that, as retail development is proposed and brought forward at Old Oak, it does not have an adverse impact upon trade in Harlesden town centre.

Shop fronts

- 9.21. The quality of frontages to the town centre streets is obviously important in terms of people's perceptions of Harlesden, and whether people are attracted to the centre. In the recent survey commissioned by Crisis Skylight Brent (2016) a number of respondents suggested that there was a need to improve or refurbish shop fronts/premises. There are some shop fronts that are in good condition whilst a large number would benefit from improvement. As well as general improvements, a consistent approach to shop fronts would improve the attractiveness of the town centre. Brent council has a Supplementary Planning Guidance Document on Shopfronts and Shop Signs⁴⁴ which, if adhered to, will provide a quality and consistent approach to shop front provision.



Fig.29. Shop front in the High Street

- 9.22. How improvements can be funded is a major issue so it will be necessary to identify whether grants might be available to help pay for shop front improvements, for example via the Mayor of London's Good Growth fund.

Policy LE2 – Shop front enhancements

Well-designed improvements to existing shop fronts will be welcomed. Proposals for new shop fronts should be designed to be well proportioned and enhance the character of Harlesden. Shop front features of architectural merit should be retained. Improvements will be prioritised within the conservation area and along Station Road.

Proposals for new or altered shop fronts should be prepared in accordance with the guidance and principles set out in Brent Council's Shopfront Guidance.

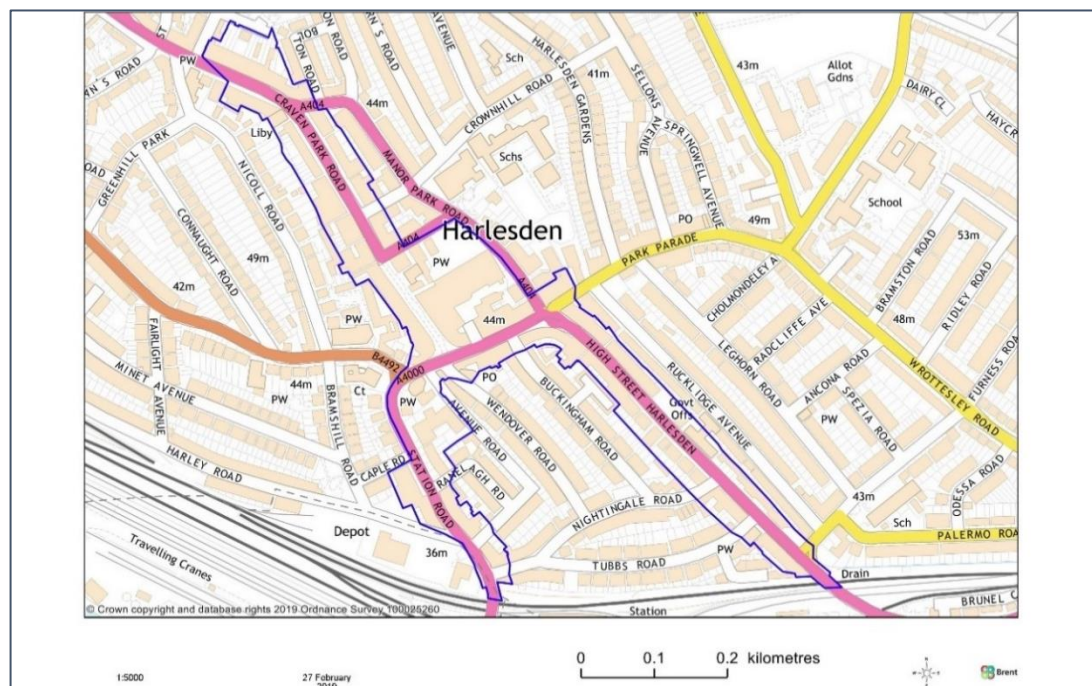
⁴⁴ <https://www.brent.gov.uk/services-for-residents/planning-and-building-control/planning-policy/spd3/>
accessed April 2019

Working with local businesses and the Council's Town Centre Manager for Harlesden, the Forum will explore opportunities to obtain funding for shop front improvements. Additionally, the Forum will press Brent Council to take enforcement action against shop fronts that are inappropriate and implemented without the necessary planning consent.

9.23. It is important that the town centre should provide a “heart for the community”, i.e. a civic space where people can meet or congregate. This would help to attract more people to the town centre thus giving more custom to shops and services in the town centre. Policy E5 in the Environment and Open Space chapter of the Plan, proposes the provision of a town square on the development of the Harlesden Plaza site in the centre of Harlesden.

9.24. Both the London Plan and Brent's Local Plan include a range of policies aimed at protecting and maintaining the vitality and viability of town centres; for example, the national policy applying a sequential approach to development by which retail, leisure and other town centre uses must consider town centre locations before out-of-town, is enshrined in both Plans. The London Plan designates Harlesden town centre as a medium growth centre capable of taking advantage of regeneration benefits. Brent policy CP16 in its Core Strategy also promotes proposals that maintain the position of centres in the retail hierarchy and identifies a town centre opportunity site at what is referred to as Harlesden Plaza (the town centre car park and adjacent property) in its Site-Specific Allocations document. It is therefore appropriate that there should be a growth of floorspace for retail or other town centre uses in or on the edge of the town centre.

- 9.25. In addition to this there may be sites available in the future along Station Road where redevelopment could accommodate some additional retail floorspace.



*Fig.30.
Harlesden
town
centre
boundary*

Takeaways and Betting Offices

- 9.26. Although many of the services taking over shop units attract people to town centres, some are less of an attraction and an over-concentration especially can lead to a centre being less attractive to shoppers and other visitors. There are also social problems which an over-concentration of certain uses can lead to, such as too many takeaways contributing to child obesity levels, for which there is a growing body of evidence. In fact, Harlesden has one of the highest concentrations of takeaways for any centre in London. Harlesden has the second highest amount of floorspace for fast food takeaways at 2,840 sq. m. Of all 148 District Centres in London, only Acton has more. Harlesden also has the second highest amount of betting office/casino floorspace at 1,700 sq. m. Only Walworth Rd is higher with 1,775 sq. m and only 4 Major or Metropolitan centres (out of 47), have more floorspace (GLA, 2012 Experian GOAD data). As Harlesden has no casino then this must be exclusively betting office and/or adult gaming centre floorspace.
- 9.27. London Plan policy 4.8 is to “manage clusters of uses having regard to their positive and negative impacts”. It states that “over-concentrations of betting shops and hot food takeaways can give rise to particular concerns”. Brent Local Plan policy DMP3 limits the concentrations of betting shops and takeaways, together with adult gaming centres and pawnbrokers, in centres across Brent, including Harlesden. The policy states that no more than 4% of the town centre frontage should consist of betting offices whilst no more than 6% of units should be takeaways. According to Brent’s own evidence, in Harlesden 3 betting offices comprise only 3% of town centre frontage whilst takeaways comprise 5.6% of units. This means that there is little scope for additional takeaways but there could be 1 additional betting office which would bring the total to 4. It is considered that there is no need for any additional controls on betting offices or takeaways therefore the Forum supports this policy.

Policy LE3 – New space for town centre uses

The development of new floorspace for retail or other town centre uses within Harlesden town centre, and connecting into Old Oak major town centre, will be supported providing it does not conflict with policies in relevant Local Plans.

Sites are identified in the Site Allocations chapter of this Plan (See Chapter 11) where the development of floorspace for new retail and other town centre uses should be accommodated. The town centre is defined in Fig.3. Brent’s Local Plan policies map.

Neighbourhood Centres

- 9.28. As well as the town centre, there are two Neighbourhood Centres within the Neighbourhood Plan Area, these are at 75-95 Acton Lane, and at 88-96 St Johns Avenue. The location of these are identified in Figure 32.

Fig.31. St John's Avenue



Fig.32. Neighbourhood centre sites



- 9.29. There has been declining custom, and therefore demand, for local shops and many have closed over the years leaving unattractive shuttered or boarded up frontages. Brent Local Plan policy DMP4 towards the neighbourhood centres is now more flexible, allowing the loss of vacant shops unless there are no other shops nearby, i.e. within 400 metres. The Forum supports this policy.

Promoting Economic Activity

- 9.30. The Forum would like to see a buoyant local economy and particularly a boost in economic activity in the town centre. There are aspirations locally for new attractions to be located in the town centre such as a music venue or a market. If a new town square is provided then this would provide a good location for an occasional speciality market. It would also particularly encourage the provision of space for creative activities locally. It is considered that there is a need for Harlesden to be marketed as a viable destination for such activities and for visitors.

Community Aspiration 11 – Promoting the town centre

Alongside local businesses, the Forum will work with Brent Council's Town Centre Manager for Harlesden, to develop a marketing strategy and/or cultural offer for Harlesden and promote the centre as a destination. It will investigate the opportunities for the provision of a speciality market in the town centre.

10. TRANSPORT AND ACCESS

Introduction

- 10.1. For Harlesden to be a thriving town centre and a pleasant place to live then careful attention needs to be given to the best balance between the need for car access and the needs of other users of streets. Making provision for vehicles is vital to the smooth functioning of urban areas and local economies but, at the same time, the design of streets must take into account the needs of all users and be more focused on people, place and environmental quality. In particular, it is important that the town centre is attractive to visitors including those who may want to come into Harlesden to shop. It is also important to the area's prosperity that it is well connected by public transport, particularly by rail. Good access to the 2 stations should be a focus of this Plan.
- 10.2. Harlesden has very low car ownership, with 52% of households having no cars or vans compared to 35% in Brent and 42% in London⁴⁵. Harlesden town centre meets the needs of the local community rather than a wider catchment therefore the centre is unlikely to be reliant upon car shoppers. Through the engagement work carried out by the Forum, concerns have been expressed by some businesses in the centre that the road scheme implemented in 2015 has resulted in falling trade because of fewer customers arriving by car, but there is little statistical evidence to support this view.
- 10.3. The Forum is aware that air quality is often poor in the area, particularly in the town centre primarily as a result of heavy concentrations of traffic. The whole of the Neighbourhood Plan Area is within an Air Quality Management area. The London Plan includes policy which states that major development should be at least air quality neutral and not lead to further deterioration of existing poor air quality. The Forum also believes that emphasis in the Neighbourhood Plan on the use of sustainable modes of transport allied with a reduction in the amount of public parking in the town centre, which is likely to encourage some people to use alternatives to the car, can help to minimise the level of air pollution derived from traffic.
- 10.4. In pursuing priorities for transport improvements through the Plan, the Forum believes that the focus should be on public transport, cycling and walking rather than the private car.

⁴⁵ Census 2011

Public Transport

- 10.5. Harlesden is accessed from two stations, Willesden Junction and Harlesden. There are no improvements to Harlesden station currently planned and there are no proposals for development at the station to help fund improvements. However, the Park Royal Transport Strategy predicts that the station will “see a significant increase in passengers by 2026, with a 40% increase to 820 passengers per hour”.⁴⁶ The Strategy also states that “Willesden Junction will remain by far the busiest Overground station in the vicinity of Park Royal” with an increase of passengers by 7%. It is proposed in the draft Old Oak & Park Royal Local Plan that Willesden Junction station will be upgraded and that there should be high density development at Willesden Junction, which can help fund the improvements.
- 10.6. It is vital for Harlesden that improvements at Willesden Junction not only improve access to and from the station for Harlesden residents and visitors, but that it also contributes towards the provision of good linkages between the new development at Old Oak and Harlesden town centre. As the draft OPDC Local Plan says, “The station will need to offer improved interchange, improved accessibility, better connections with buses and high quality pedestrian and cycle links to the surrounding streets”. A complete redevelopment of Willesden Junction station, including rafting over the railway tracks to support new development, is likely to provide the optimal solution for improving linkages. It is important that there should be improvements to access to Harrow Road as well as to Station Road.



Fig.33. Willesden Junction station

Policy T1 – Willesden Junction Station access

Development at Willesden Junction station should include improvements to, and/or new, pedestrian and cycling access both from Station Road and from Harrow Road. (Please see Chapter 11 ‘Site Allocation 4’ for more on this site)

⁴⁶ Available at https://www.london.gov.uk/sites/default/files/prts_report_final_new_cover.pdf , accessed March 2019

- 10.7. It is also important that there should be good public transport access from Harlesden to the new regeneration area at Old Oak. London Overground will provide a good link from Willesden Junction to the new interchange station and the heart of the regeneration area when the proposed new stations at Hythe Road and Old Oak Common lane are delivered. In addition, it is important for Harlesden that there should be a good direct bus service between Harlesden town centre and the new regeneration area. The draft Local Plan shows a proposed new link from Willesden Junction into the new regeneration area but no direct connection from Harlesden. The Neighbourhood Forum will press bus operators to include a direct bus route from Harlesden through the proposed new High Street to the new Interchange station on HS2.

Community Aspiration 12 – Direct OPDC bus route

The Neighbourhood Forum will liaise with the OPDC, TfL, the boroughs and bus operators to seek a direct bus route from Harlesden through the Old Oak major centre to the new interchange station once the station is operational.

Roads and Traffic

- 10.8. A number of roads in Harlesden suffer from heavy traffic and traffic congestion, particularly in the town centre along Craven Park Road, the High Street and Station Road. There are also 'rat runs' along mainly residential streets that suffer from heavy traffic, such as Tubbs Road and Nightingale Road.
- 10.9. Regeneration at Old Oak will inevitably increase traffic levels locally in and around Harlesden, including potentially from HGVs during construction. Preliminary assessments by TfL of the predicted impact of development showed potential for increased traffic through certain streets such as All Souls Avenue. The Park Royal Transport Strategy predicts a 7-9% growth in traffic across Park Royal from current levels by 2041 when the build out of regeneration is expected to be complete. However, it also states that there will be only "relatively modest increase in traffic volumes on the roads surrounding Park Royal....due to existing capacity constraints". Nevertheless, Acton Lane, for example, is shown to have one of the highest increases in traffic levels entering Park Royal at 10-15%.
- 10.10. Interventions proposed in the Park Royal Transport Strategy are mainly to achieve modal shift away from the car including the substantial uplift in public transport capacity provided particularly by Crossrail & HS2. It is acknowledged, however, that will not accommodate all the extra demand, particularly in relation to the forecast additional freight and servicing movements. No major road improvements are proposed apart from some junction improvements at Park Royal Road, Acton Lane/North Acton Road and Abbey Road.
- 10.11. The OPDC is developing a Construction Logistics Strategy to mitigate impacts of construction.

- 10.12. A road proposal that has been considered in the past that would be of considerable benefit to Harlesden is a new road link between Scrubs lane and Old Oak Common Lane. This would relieve both Tubbs Road and Nightingale Road particularly from traffic that currently uses these residential roads as a 'rat-run' to Park Royal via Station Road and Old Oak Common Lane. It would also relieve the pressures of traffic on High Street and Station Road. It is inevitable that traffic conditions will worsen in these roads as a result of Old Oak development without some significant intervention.



Fig.34. Nightingale Rd at junction with High Street

- 10.13. Policy T1 in the OPDC draft Local Plan⁴⁷ states that “development proposals should:

- *support the delivery of a range of new and improved streets that help overcome severance, alleviate congestion and optimise connectivity both within the development area and to surrounding areas;*
- *mitigate the impact of development on the surrounding local and strategic road network”*



Fig.35. Kilburn Streets for people scheme

- 10.14. There is an opportunity through the regeneration at Old Oak to achieve the above, and in particular to not only mitigate the impact of development on local roads but also help to relieve existing problems such as those described at Tubbs Road and Nightingale Road. A new link through from Scrubs Lane to Old Oak Common Lane, south of the West Coast Main Line would achieve this to the benefit of the adjacent community in Harlesden, including improving the pedestrian environment at one of the main gateways into Harlesden town centre.

Community Aspiration 13 – Traffic level rise mitigation

The Forum will liaise with the OPDC and TfL regularly to ensure any traffic level increases that may be generated in Harlesden as a result of redevelopment at Old Oak are minimised, and the Forum will also seek mitigation measures for any subsequent increases in traffic levels.

⁴⁷ Available at https://www.london.gov.uk/sites/default/files/opdc_local_plan_2018.pdf , accessed March 2019

- 10.15. The prospect of even more traffic 'rat-running' through residential streets in and around Harlesden to access new development at Old Oak and Park Royal is of concern to the local community. Apart from the above suggested improvement, which it is firmly believed would remove heavy traffic from those particular residential roads, there are some local measures that can be implemented to relieve other residential roads from through traffic. Such traffic management measures should seek to achieve an inclusive, safe and accessible environment for all and could include, for example, traffic calming, width restrictions or the closure of roads at one end to prevent through traffic. The closure of some roads to through traffic would also provide an opportunity to implement schemes, such as that proposed in the Environment and Open Space chapter, to provide play space or areas for more informal relaxation. It is the view of the Forum that public funding should be made available to enable measures to be implemented in Harlesden to mitigate the impact of new development at Old Oak.

Car Parking

- 10.16. One of the most contentious issues for Harlesden in recent years has been car parking in the town centre. Shoppers parking along Craven Park Road, although convenient for the shops located there, have in the past caused problems of congestion and hold-up in the street. With the implementation of the new road scheme in 2015 parking restrictions on the street are more stringent. The alternative is the town centre car park on Tavistock Road/Manor Park Road, although this appears to be underused with the cost of parking cited as a deterrent to shoppers parking there. A recent survey in the centre also identified businesses concerned about declining trade which a number attributed to the more severe parking constraints.
- 10.17. The future of Harlesden is likely to be primarily based upon locally based trade, particularly as more than 50% of households in Harlesden do not have access to a car, and a good link with Willesden Junction station and the new development at Old Oak attracting those coming by public transport and those working nearby. It is highly unlikely that there will be a return to multiple parking on Craven Park Road and, given the problems that arose in the past, this would not be desirable. The main car park in the centre at Tavistock Road/Manor Park Road has about 120 spaces and is privately operated therefore there is no local control over the parking fees charged. Surveys of the car park carried out in 2017 show that it is underused. The survey showed that its peak usage was only 62% of capacity. Consequently, it will be of benefit to the centre in the longer term for the car park to be developed, with some public car parking spaces retained underneath a mixed commercial and residential development but with the provision of a town square as proposed in policy E5 of the Environment and Open Space chapter and Site Allocation 1. The viability of a potential development proposal, including car parking, for this site has been assessed and found to be financially feasible⁴⁸.
- 10.18. There is another small public car park in the centre at Wendover Road (26 spaces). This appears to be well used so should be retained.

⁴⁸ Assessment available to view on the Harlesden Neighbourhood Forum website
www.harlesdenneighbourhoodforum.com

Policy T2 – Town Centre parking space retention

An element of public car parking will be provided in any development or redevelopment of the privately-operated car park site at Tavistock Road/Manor Park Road. The number of spaces to be provided will take into account the other proposed land uses on the site and will be determined in consultation with the London Borough of Brent. (Please see Chapter 11 policy SA 1 'Site Allocation 1' for more on this site)

Cycling

10.19. Cycle routes in the area are mainly along trafficked roads, including Harley Road, St Mary's Road, Longstone Avenue, Doyle Gardens and All Souls Avenue, and a small section off-road at Roundwood Park. Cycle route markings and signage are poor. There is no route into the centre of Harlesden and cycle parking provision is inadequate.

10.20. If access to the centre is to be more reliant upon non-car modes, including by bicycle, then there needs to be significant improvements to cycle provision. The new shared surface in the High Street is now a safe place to cycle but this needs to be signed and linked to other parts of the area. The priority for new provision should be along Station Road to Willesden Junction and Old Oak, including the canal, together with cycle parking facilities in the town centre. There are opportunities to better connect and improve routes across the wider cycle network as shown in the emerging OPDC Local Plan (transport chapter). The availability of safe cycle routes from the town centre to nearby sports centres and Roundwood Park is also important. There will be limited funding available for new cycling provision. Funding sources will be examined including from Brent Council, TfL and the OPDC as well as local CIL funding and possibly Section 106 agreements.



Policy T3 – Cycling provision

The priorities for new cycling provision are a new cycle route from Willesden Junction station along Station Road to the High Street together with cycle parking facilities in the town centre.

Walking

10.21. As well as cycling provision, it is equally important that the pedestrian environment is improved and made more attractive. Once again, a priority for improvement should be the route along Station Road from Willesden Junction station to the High Street, linking with the pedestrian route from Old Oak. This route would be significantly enhanced with the implementation of appropriate development at this gateway.

10.22. The pedestrian environment in residential streets can be significantly enhanced by implementation of proposals to close some streets to through traffic and the implementation of environmental enhancements such as tree planting referred to in the Environment and Open Space chapter. The provision of the town square will also substantially improve conditions for pedestrians in the town centre.

Policy T4 – Station Road environment improvements

The priority route for improvements to the pedestrian environment is from Willesden Junction station along Station Road to the High Street. Development at Willesden Junction and along Station Road should be designed so as to improve conditions for pedestrians.

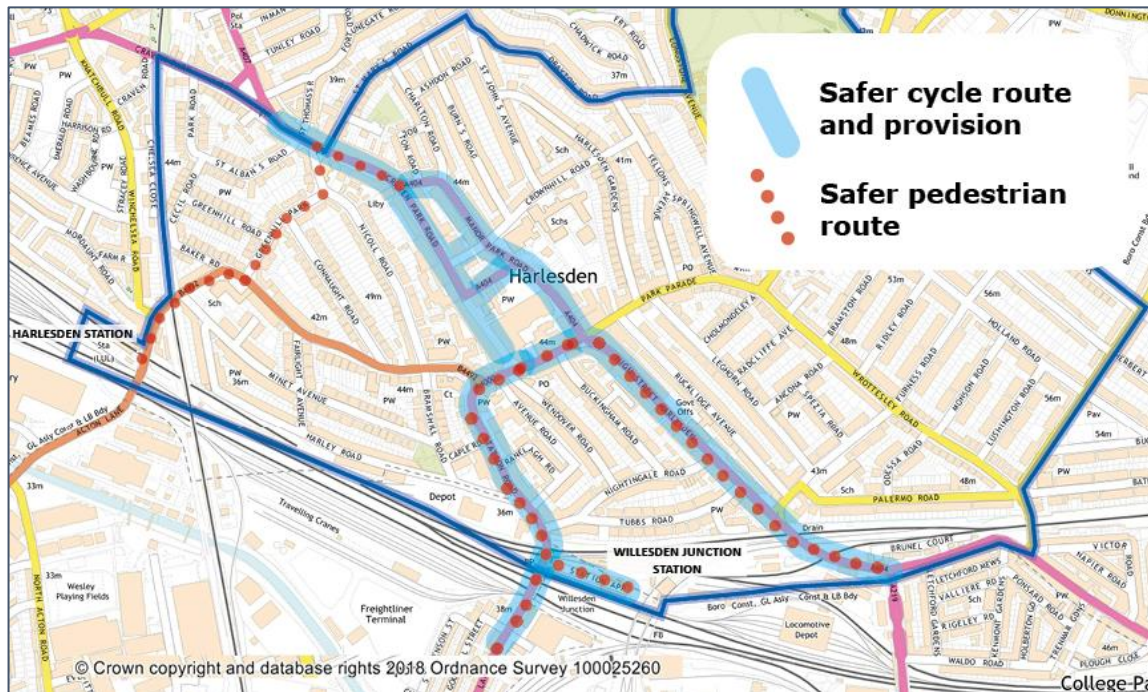


Fig.36. Priority safer cycling and pedestrian provision

Community Aspiration 14 – Types of Pedestrian and Cycle access improvement

The Forum will work with Brent council, the OPDC, local groups and accessibility and cycling organisations to identify which types of improvements to pedestrian and cycle access in Harlesden are appropriate. The Forum will also support the delivery of subsequent schemes which will make access safer, easier and more appealing.

11. SITE ALLOCATIONS AND OTHER POTENTIAL DEVELOPMENT SITES

Introduction

- 11.1. There are few development opportunities within the Harlesden Neighbourhood Plan Area but there is a particular need for new housing, development to make the town centre a greater attraction, additional community facilities and more open space. It is important, therefore, that where opportunities exist for development that the potential of sites is maximised and that development, where possible, helps to meet an established need.
- 11.2. This chapter is divided into two types of site: those which are designated as Site Allocations, and those where the Neighbourhood Forum considers there is good development potential, but there is some uncertainty about the prospects for development, in the short term particularly, because there has been no contact with site owners. All sites included below, with the exception of the Willesden Junction site, have been assessed by consultants AECOM on behalf of the Forum.⁴⁹ Following completion of the appraisal, two sites were considered appropriate for inclusion in the Neighbourhood Plan as amended allocations, amending and updating the previous site boundaries from Brent Council's 2011 Site Specific Allocations document, and four were assessed as being potentially appropriate for allocation if their availability can be demonstrated, or for inclusion in the Plan as aspirations (if availability cannot be demonstrated). Three sites, listed as Potential Development Sites and numbered 5-7 below, are consequently included as aspirations of the Forum.
- 11.3. There are 4 sites included as Site Allocations because there is a good prospect that they will be brought forward for development within the lifetime of the Plan. The first two sites are included in the Site-Specific Allocations document of Brent's Local Plan and were adopted in 2011. Both sites have significant changes to their boundaries because of changed circumstances. The policy for these sites set out below supersedes that set out in the 2011 Site Specific Allocations document. Brent Council accepts the revisions to these two sites and supports their inclusion in the Neighbourhood Plan. They will supersede the two allocations in Brent's Local plan. The third site at Harlesden Road, included as a new site allocation, has received planning consent for housing in the past. The fourth site, Willesden Junction Station, is also included in the draft OPDC Local Plan. The Harlesden community has identified some development objectives which it would like to see fulfilled upon development of the site so these are included
- 11.4. For each site allocation the policy included will be applied by the local planning authority in determining planning applications. Planning applications will also be determined in line with policies and guidance in the relevant Local Plan and the London Plan regarding, for example, design including appropriate height, scale and massing.

⁴⁹ Harlesden Neighbourhood Plan - Site Assessment, AECOM, December 2017, available on www.HarlesdenNeighbourhoodForum.com

11.5. A set of detailed information is provided for each site also, including location, the site area, relevant planning history, any development constraints together with the development proposals, i.e. what the Plan is seeking out of development. An indicative housing capacity, in number of housing units, is also given for all sites apart from Willesden Junction Station. This is an estimate of the number of units that can potentially be provided based upon the average of the density ranges set out in table 3.2 of the London Plan, taking account of public transport accessibility and location. Any proposals for housing on these sites will be subject to the application of policies in both the London Plan and relevant Local Plans on matters such as design, including the potential effect on neighbouring properties and areas. These capacity figures are, therefore only indicative and may be higher or lower when detailed plans are drawn up. Housing capacity information for Willesden Junction Station is provided through the OPDC's Local Plan and defined by OPDC's Development Capacity Study.

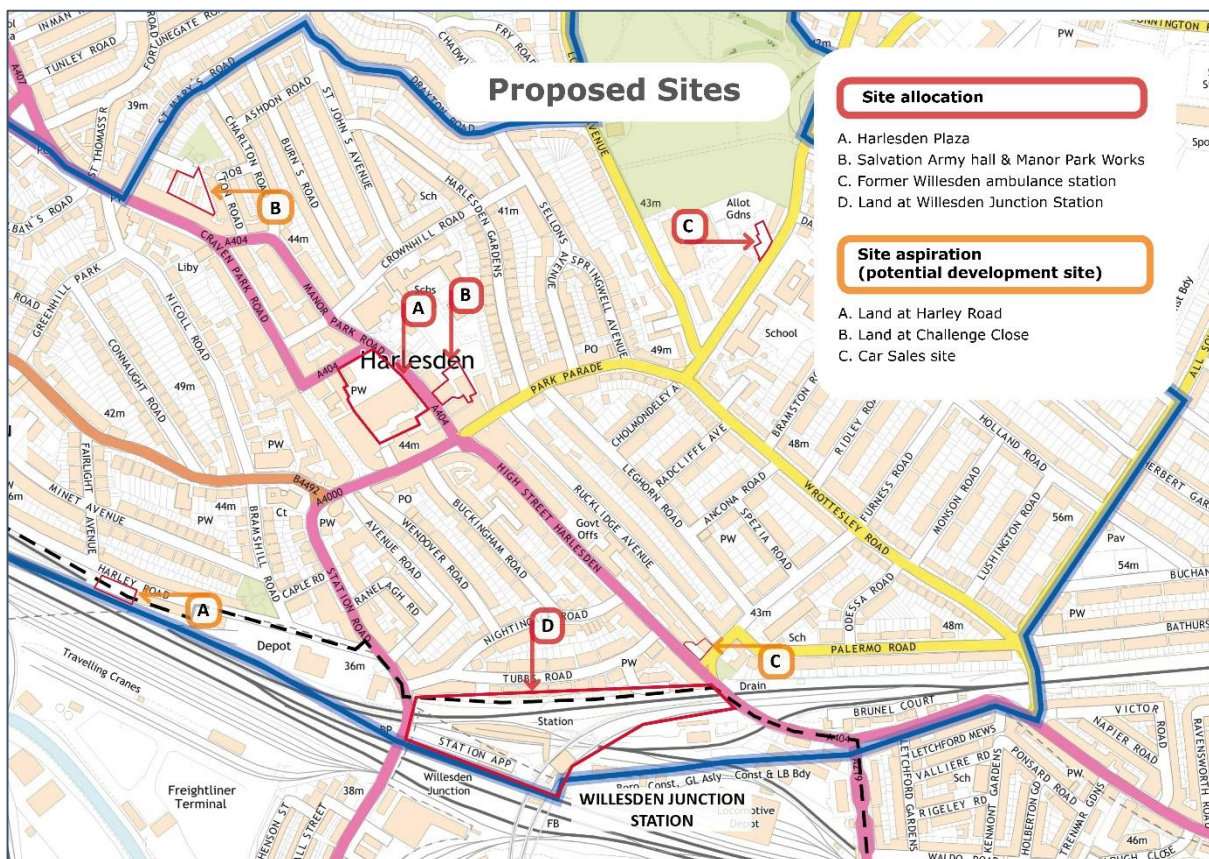


Fig.37. Map of proposed sites

Site Allocations

Site Allocation 1: HARLESDEN PLAZA



- 11.6. This site comprises the main town centre car park and adjacent retail properties. Development could be based just on the car park and the current Burger King restaurant or also include the Tesco store and adjacent shops for development which optimises the potential capacity of the site.

Site area: 0.9 hectares

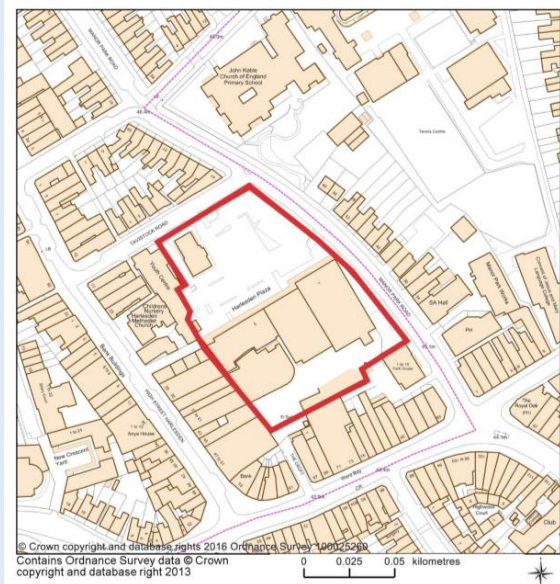
Planning History: None relevant

Policy SA 1 – Harlesden Plaza site allocation

Development should include commercial on the ground floor, a justified amount of replacement car parking, community space, residential on upper levels and a town square open to the public. (Please see in Chapter 8 'Town Square' and indicative images in Figs. 18-22 in the Plan, as well as Chapter 6 Housing and Chapter 12 Design Principles for more on this site).

Any development should contribute towards Harlesden's historic character and respond to local urban design characteristics. The town square should be positioned so that it is visible from both the High Street and from Manor Park Road, and should be accessible to pedestrians from these streets, and from the south. Ideally, public car parking will be basement parking.

It should be clearly demonstrated that the water supply and drainage requirements of any redevelopment scheme have been appropriately addressed.



Justification:

- 11.7. The car park is underused. Development of the site, including a small public square, would regenerate the core of the town centre providing a 'heart' for the local community as well as reinvigorating the town centre offer and providing new housing.

Indicative housing capacity: 208 units

Water / waste water:

- 11.8. Thames Water have concerns that the water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Potential developers are encouraged to work with Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered. Thames Water have concerns regarding the foul water capacity for this location.

Site Allocation 2: SALVATION ARMY HALL AND MANOR PARK WORKS, MANOR PARK ROAD



- 11.9. The site consists of a 4-storey former industrial building (Manor Park Works) to the rear of the Picture Palace public house together with the Salvation Army Hall and adjacent car parking to the rear of 34-38 Manor Park Road.

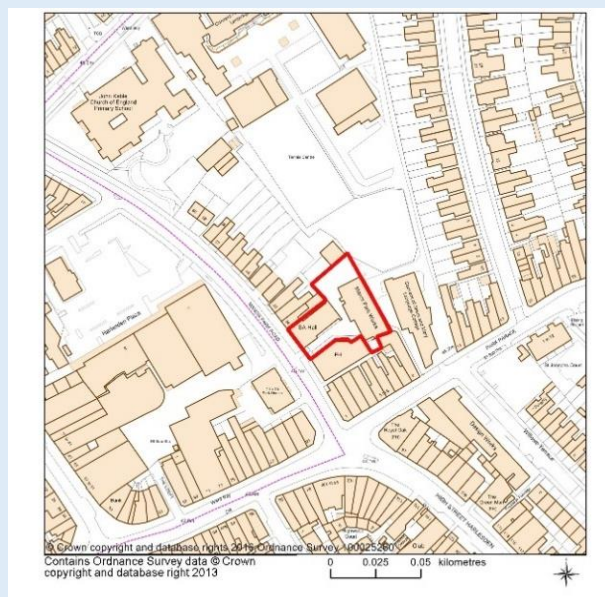
Site area: 0.2 hectares

Planning History:

- 11.10. Refusal of planning permission on Manor Park Works (17/2331) in October 2017 for an extension to existing building to 7 storeys and erection of a new 8 storey building comprising a total of 45 flats.

Policy SA 2 – Salvation Army hall and Manor Park Works site allocation

Development should be for residential and a replacement Salvation Army hall. Development could be brought forward for the Salvation Army site separately, although there are significant benefits, such as the provision of common access off Manor Park Road, if the site is developed comprehensively. Proposals should have regard to the Archaeological Priority Area designation across the site.



Justification:

- 11.11. Development would optimise the use of land by providing new housing in addition to a new Salvation Army hall. It would also enhance the townscape along Manor Park Road.

Indicative housing capacity: 31 units

Water / waste water:

- 11.12. Thames Water have concerns regarding the foul water capacity for this location.

Site Allocation 3: FORMER WILLESDEN AMBULANCE STATION, 164 HARLESDEN ROAD



- 11.13. Now a cleared, open site.

Site area: 0.07 Hectares

Planning History:

- 11.14. Planning permission (09/2352) granted in 2010 for 4/5 storey building comprising 8 flats.

Policy SA 3 – Former Willesden Ambulance Station, 164 Harlesden Road site allocation

Development of site should be for residential use.



Justification:

11.15. The site has been an eyesore for some time having been used to store waste. It has the potential to provide new homes.

Indicative housing capacity: 8 units

Site Allocation 4: WILLESDEN JUNCTION STATION



11.16. The development site comprises the station buildings as well as approach roads and footpaths. The site also includes currently vacant land north of the railway tracks at the rear of Tubbs Road

Site area: 3.5 Hectares

Planning History: None relevant

Planning Context:

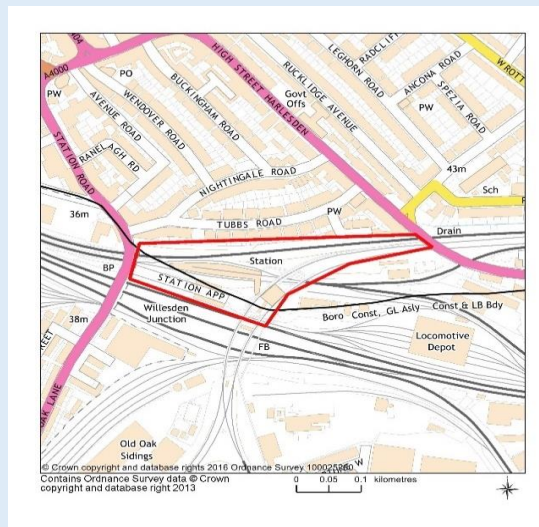
Policy P11 Willesden Junction Place in the draft OPDC Local Plan Policy is particularly relevant.

Policy SA 4 – Willesden Junction Station site allocation

Development adjacent to, and over, Willesden Junction station should include residential, offices and town centre uses with active frontages at ground level. Improvements to the station should include good pedestrian access from the north, especially from Station Road. Improvements to the access from Harrow Road will also be required, including safety improvements. There should be a direct and attractive pedestrian route to Harlesden from the new bridge over the West Coast Main Line. A cycle route and cycle parking facilities should also be provided.

Any tall buildings should not have an unacceptable adverse impact upon their surroundings.

It should be clearly demonstrated that the water supply and drainage requirements of any redevelopment scheme have been appropriately addressed.



Justification:

11.17. Planning policy for Willesden Junction station (P11) is included in the draft OPDC Local Plan

11.18. It is anticipated that the redevelopment of this site will not commence before 2038, although earlier development of the site will be supported.

Indicative housing capacity:

11.19. Work is on-going by OPDC to identify the potential residential capacity of the site.

Water / waste water:

11.20. The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work with Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered.

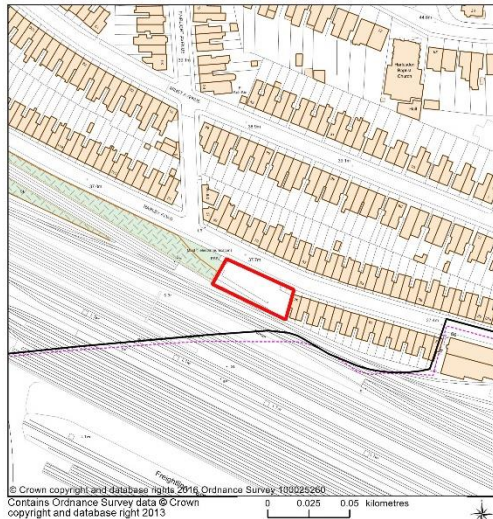
11.21. Thames Water have concerns regarding the foul water capacity for this location.

Potential Development Sites

HARLEY ROAD



- 11.22. Currently a small, open yard adjacent to the railway lines on the south side of Harley Road capable of providing new homes. Development would improve the streetscape.



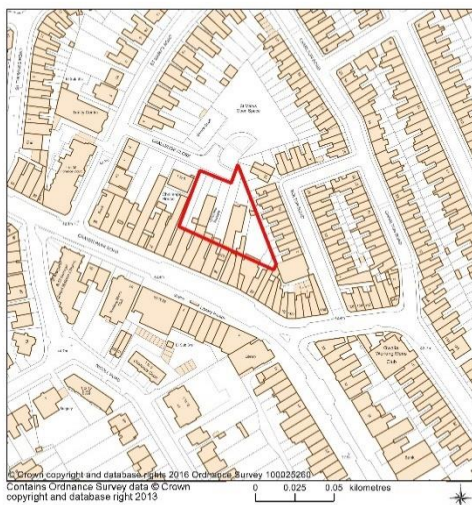
Site area: 0.1 hectares

Planning History: None relevant

LAND AT CHALLENGE CLOSE AND REAR OF 50-70 CRAVEN PARK ROAD



- 11.23. Part vacant land and rear of shop premises on Craven Park Road which has potential for development for new housing.



Site area: 0.15 Hectares

Planning History: None relevant

CAR SALES AT JUNCTION OF HIGH STREET AND FURNESS ROAD



- 11.24. Although currently operational open car sales, this is an underuse of a site that could be developed to provide housing together with commercial use at ground floor level on the High Street frontage.



Site area: 0.1 Hectares

Planning History: None relevant

12. DESIGN PRINCIPLES

- 12.1. Harlesden Town Centre's identity is defined by it being sociable, tolerant, diverse and filled with cultural traditions and characterful buildings. In particular, the Forum recognises Harlesden's unique background in the live and independent music scene.
- 12.2. Most notably, the iconic Mean Fiddler venue at 16-24 High street was a buzzing establishment between 1982 and 2000 and a name still recognised internationally. On the eastern side of the Harlesden Plaza is the Picture Palace building which also has a history in live music. There currently stands two independent record shops – Starlight and Hawkeye - on either side of the high street close to the old Mean Fiddler site. Their sound systems play a big part in the liveliness of daily life up the high street - as does, it is noted, the variety in form, colour and pattern within the architecture of the high street buildings themselves (specifically those in the designated conservation area).
- 12.3. Development in the town centre (this area is defined in Fig.3. Brent Local Plan policies map), and particularly as part of the anticipated redevelopment of the Harlesden Plaza area, will be expected to enhance and celebrate the local character and history of Harlesden. This should be through high quality, attractive design - following principles set out below in Policy DP1 - that has been developed in unison with the community.

Policy DP1 – Town centre development design principles

The following principles should to be considered within design options for development proposals in Harlesden town centre:

Material: Prioritisation of brick and other high quality traditional materials present in the conservation area with an emphasis on durability

Form: Buildings should be carefully articulated to retain a feeling of the 'human scale' of Harlesden. They should respond positively to the fine street grain present in the conservation area, and the variation in forms, notably at roof level to add visual interest

Height: The height of buildings in the town centre should be appropriate to their setting and should contribute favourably towards retaining the historic character of Harlesden town centre and respond appropriately to the existing urban design characteristics

Features: The public square should be designed taking into account the safety and comfort of users of all ages – with well-designed lighting, seating and surfaces. It should be versatile enough to host social and community activities for daytime and evening in all seasons. A softer landscaping element and/or focal point should also be included

Layout and access: Active frontages on the square, natural surveillance and good legibility. Plaza access points in particular should be animated, and prioritise safety (particularly at roads) and visibility

- 12.4. In addition to the above, the Forum suggests that new design detail could incorporate motif or pattern which is existent in surrounding buildings, is distinctive or unique to Harlesden, or in a nature theme. Multi-toned, natural colours would fit best within the context.
- 12.5. Finally, as mentioned in other parts of this document, the Forum welcomes a mix of uses in this space. This should include housing, community use space, a town square, retail, business and entertainment space. Proposals for car parking and public toilets should be sensitively integrated into any new development.



Fig.37. Views of design, culture and character in Harlesden's built environment

13. DELIVERING THE NEIGHBOURHOOD PLAN

- 13.1. Delivery of the Vision set out in this Neighbourhood Plan relies partly on implementing the policies which apply to planning proposals for the area. These will take effect as planning proposals are brought forward and will be administered by Brent Council or the OPDC, and potentially in some cases the Mayor of London also, as the local planning authorities responsible for processing planning applications.
- 13.2. There are, however, a number of aspirations set out in the Neighbourhood Plan which cannot be achieved through the implementation of planning policy and will require action by the Forum in partnership with other agencies including Brent council, the OPDC, the Mayor of London and others. These 'projects', such as the improvement of shop fronts, will often require funding so the Forum will bid, in liaison with other agencies, for funding from a variety of sources.
- 13.3. The Forum also anticipates that Community Infrastructure Levy (CIL) funds will become available to support objectives for the area. This will be known as Neighbourhood CIL.
- 13.4. The Community Infrastructure Levy Regulations state that:
- Any monies received through the Levy is meant "to support development" of the area, including funding towards "the provision, improvement, replacement, operation or maintenance of infrastructure" or "anything else that is concerned with addressing the demands that development places on an area".
 - Throughout the neighbourhood plan proposals that CIL funds will be sought for have been identified. Policy D1 below outlines the priorities for CIL funding.

Policy D1 – Community Infrastructure Levy funding priorities

Priorities for the use of Neighbourhood CIL funds are:

- improvements to the pedestrian environment from Willesden Junction station along Station Road to the High Street;
- provision of new cycle routes (in line with priority routes shown in Figure 36) together with cycle parking facilities in the town centre;
- planting of new street trees;
- provision and laying out of new public open space or improvement of existing open space;
- provision of safe play space in streets;
- town centre improvements;
- and community facilities.

Project Plan and CIL Spending Priorities

- 13.5. The following have been identified through the Plan as projects that the community wish to take forward. Some will be reliant upon development being brought forward whilst others will be capable of being implemented through part or whole funding by CIL. The Forum will also bid for funds to implement other projects such as shop front improvements, and look for other funding sources in addition to Neighbourhood CIL.
- 13.6. Most of the projects, such as the cycle route and public realm improvements, will also require implementation in partnership with the appropriate public agency, generally Brent Council (shown in the table below as LBB).
- 13.7. Timescales are indicative only and actual implementation will be dependent on a number of factors but primarily the availability of funds and/or the timing of implementation of development by private developers.

Project	Action by:	Timescale	Priority level for CIL funding (1 being top)
Town square public realm	Forum, developer	2022-2030	1
Cycle route High Street to Old Oak	Forum, LBB, OPDC	2022-2030	1
Pedestrian environment improvements High Street to Old Oak	Forum, LBB, OPDC	2022-2030	1
Street tree planting	Forum, LBB	2018-2033	2
Safe play space in streets	Forum, LBB	2019-2025	2
Cycle parking facilities in town centre	Forum, LBB	2022	2
Community hub	Forum, LBB, developer	2022-2030	2
Open space improvements, particularly Roundwood Park recreational space	Forum, LBB	2020	3
Shop front improvements	Forum, GLA, shop owners	2019-2024	-
Community housing	Forum	2018-	-

Monitoring

- 13.8. In an area where there is likely to be significant change it is important that the adopted policies are appropriately monitored to ensure that any change in circumstances can be properly addressed. To that end the HNF will continue to act as guardians of the Plan and keep the content and implementation of the policies under review.

Appendix A – HARLESDEN NEIGHBOURHOOD PLAN - Glossary of Terms

Active frontage

Street frontages where there is active visual engagement between people using the street and ground floor premises. This could include, for example, through shops, cafes and restaurants.

Adoption

The procedure by which a plan becomes formal council responsibility. The Neighbourhood Planning Regulations also call this stage 'made' for the purposes of a Neighbourhood Plan.

Affordable housing

Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

- Social rented housing: is owned by local authorities and private registered providers (as defined by s80 of the Housing and Regeneration Act 2008, commonly known as housing associations), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.
- Affordable rented housing: is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges where applicable).
- Intermediate housing: homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.
- Starter homes: a new building dwelling available for purchase by qualifying first-time buyers only (between the ages of 23 and 39) and sold for at least 20% below the market value. Must be sold for less than the price cap - £250,000 outside Greater London.

Homes that do not meet the above definition of affordable housing, such as 'low cost market' housing, may not be considered as affordable housing for planning purposes.

Allocation

A piece of land that has had a particular use earmarked via a Neighbourhood Plan or Local Plan. This might be for housing, employment or another use such as open space.

Amenity Land

Land which is valued locally for its visual importance and contribution.

For example, open land, trees, historic buildings and the inter- relationship between them, or less tangible factors such as tranquility.

Areas of Archaeological Interest (AAI) or Archeological Priority Areas

An area which holds or potentially holds evidence of past human activity worthy of expert investigation.

Article 4 Direction

Direction which removes some or all permitted development rights which were granted by the General Permitted Development Order

Asset of community value

Land or property of importance to a local community which is subject to additional protection from development under the Localism Act 2011.

Basic Conditions

Criteria that a Neighbourhood Plan must meet before it can come into force. These are:

- They must have appropriate regard to national policy,
- They must contribute to the achievement of sustainable development,
- They must be in general conformity with the strategic policies in the development plan for the local area,
- They must be compatible with EU obligations.

Biodiversity

The whole variety of life encompassing variations, including plants and animals.

Brent Local Plan

Brent's Local Plan is a collection of planning documents that, in conjunction with national planning policy and the Mayor's London Plan, sets out the strategy for future development in Brent. It covers the core strategy (see above), development management policies, site-specific allocations, the West London waste plan, planning guidance and neighbourhood plans. A new plan, *Shaping Brent's Future Together*, is being developed in 2018.

Brownfield

Land that has been previously developed (excluding agricultural or forestry buildings and residential gardens).

Community Infrastructure Levy (CIL)

Allows local authorities to raise funds from developers undertaking new building projects in their areas. Money can be used to fund a wide range of infrastructure such as transport schemes, schools and leisure centres.

Community land trust

A form of community-led housing, set up and run by ordinary people to develop and manage homes as well as other assets. CLTs act as long-term stewards of housing, ensuring that it remains genuinely affordable, based on what people actually earn in their area, not just for now but for every future occupier.

Community Right to Build

These will enable parish councils or community groups to bring forward small-scale developments without the need for planning permission. A community group, not just a town or parish council, is able to develop a Community Right to Build Order provided the members meet the relevant criteria.

Conservation Area

An area designated under Section 69 of the Town and Country Planning (Listed Building and Conservation Areas) Act 1990 as being of 'special architectural or historical interest' the character and appearance of which it is desirable to preserve and enhance.

Statement of Consultation

A document which details when, where and how the public and stakeholders have been consulted, issues that were raised and how they were addressed.

Core Strategy

A development plan document forming part of a Brent's Local Plan, which sets out a vision and core policies for the development of an area.

Designated Neighbourhood (Plan) Area

This is the area on which the plan will focus.

Density

In the case of residential development, a measurement of either the number of habitable rooms per hectare or the number of dwellings per hectare.

Developer Contributions

Developer contributions, also known as planning obligations, can be secured via a Section 106 legal agreement (see below) or planning conditions attached to a planning permission. They help mitigate any adverse impacts generated by new development on infrastructure and facilities. (see also CIL above)

Development

Development is defined under the 1990 Town and Country Planning Act as "the carrying out of building, engineering, mining or other operation in, on, over or under land, or the making of any material change in the use of any building or other land."

Development Plan Document (DPD)

Development Plan Documents are planning policy documents which make up the Local Plan. They help to guide development within a local planning authority area by setting out the detailed planning policies, which planning officers use to make their decisions on planning applications.

Employment Land

Land that is used or is proposed to be used for offices, industry and/or storage and distribution – covered by the B Class in the Use Classes Order.

Environmental Impact Assessment (EIA)

Evaluates the likely environmental impacts of the development, together with an assessment of how these impacts could be reduced.

Evidence Base

The information and data gathered by local authorities and other plan makers, including neighbourhood forums, to inform and support the policy approaches to be set out in a Local Plan or Neighbourhood Plan

Examination

The Neighbourhood Plan is subject to independent examination. This considers two matters of legal compliance and soundness. To be considered 'sound' a Core Strategy should be justified, effective and consistent with National Policy.

Gateway

A prominent and distinctive entry point into the Town Centre, made so by the layout, design, location, open space provision and features of the townscape, including vehicular, cycling and walking routes.

General Permitted Development Order (GPDO)

A statutory document that allows development (such as small house extensions) to be undertaken without planning permission.

Greenfield Site

Land where there has been no previous development.

Green Infrastructure

A network of multi-functional green space and other environmental features, urban and rural, including both established and new sites - which support natural and ecological processes, and are capable of delivering a wide range of environmental and quality of life benefits for local communities.

Health Impact Assessment (HIA)

Assessment which evaluates the health and well-being of a population and how it may be affected by a plan, project or policy. The assessment will identify ways in which positive impacts for health gain can be maximised, and risks to health minimised.

Heritage Assets

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).

Houses in Multiple Occupation (HMO)

A building or part of a building that is being occupied as a main residence by three or more unrelated people who share some facilities, such as a bathroom or kitchen

Human Scale

Human Scale is commonly defined as architectural scale appropriate, specific, or comprehensible to the people who use the space; humans feel comfortable and can navigate easily.

Infrastructure Delivery Plan (IDP)

Identifies the physical, social and green infrastructure needed to support the Local Plan policies over the Local Plan period, including when the infrastructure will be required, how much it will cost and how it will be funded.

Integrated Impact Assessment (IIA)

Brings together the Sustainability Appraisal (SA), Strategic Environmental Appraisal (SEA), Health Impact Assessment (HIA) and Equality Impact Assessment (EqIA) into a single framework.

Listed Building

A building of special architectural or historic interest. Listed buildings are graded I, II* or II. Listing includes the interior as well as the exterior of the building, and any buildings or permanent structures (e.g. wells within its curtilage). Historic England is responsible for designating buildings for listing in England.

Local Geological Site (LGS)

A site designated to protect areas of geological value in the Local Plan area.

Locally Significant Industrial Sites (LSIS)

Areas which have particular importance for industrial and related functions at a local level.

London Plan (The)

The London Plan is prepared by the Mayor of London and published by the Greater London Authority. It is a spatial development strategy setting out an economic, environmental, transport and social framework for the development of London to 2036. It is only intended to deal with things of strategic importance to Greater London. The current plan was published in 2016 and public consultation on a new plan ended in March 2018. A new plan is expected at the beginning of 2020.

Local Wildlife Site (LWS)

Non- statutory sites of substantive nature conservation interest determined locally according to national, regional and local biodiversity needs.

Major Development

10 or more dwellings or has a site area of 0.5 hectares or more, the development is for 1,000 square metres or more of floorspace, or has a site area of 1 hectare or more.

Ministry of Housing, Communities and Local Government (MHCLG)

Established in January 2018 it was formerly the Department for Communities & Local Government (DCLG). It is the Government department that sets policy on supporting local government; community cohesion; building regulation and planning; urban regeneration; and decentralisation.

Mixed-use Development

A type of urban development where multiple compatible land uses – such as residential, business, retail or recreational uses - are combined. The uses are physically and functionally integrated with one another within the development. May vary in intensity and scale from a single building to an urban extension.

National Planning Policy Framework (NPPF)

Sets out the Government's planning policies for England and how these are expected to be applied.

National Planning Practice Guidance (NPPG)

A web-based resource, provides more detailed guidance on the contents of the NPPF.

Neighbourhood Forum

For neighbourhood planning outside a town/parish area a neighbourhood forum of at least 21 people should be set up. It needs to be approved by the Council

Neighbourhood Development Order

Can grant permission for specific developments in a Neighbourhood Area. Where there is an Order in place, there would be no need to apply to the Council for planning permission for the development it covers.

Neighbourhood (Development) Plan

Will set out the vision for a neighbourhood area and the planning policies for the use and development of land. These policies will be at a local level to support the strategic policies within the emerging Local Plan. Plans should guide development rather than stop it.

If adopted, a Neighbourhood Plan will become a statutory plan carrying equal weight with adopted local plan policies.

Planning Act 1990 (Listed Building and Conservation Areas)

The primary piece of legislation covering listed buildings and conservation areas.

Policy

A concise statement of the principles that a particular kind of development proposal should satisfy in order to obtain planning permission.

Policies Map

Illustrates the spatial extent of the Forum's planning policies and reflects up-to-date planning strategy for the area, which may include separate inset maps for part of an area.

Public Realm

Those parts of a town or city (whether publicly or privately owned) available for everyone to use. This includes streets, squares and parks.

Qualifying Body

Either a parish/town council or neighbourhood forum, which can initiate the process of neighbourhood planning.

Referendum

A vote by the eligible population of an electoral area who may decide on a matter of public policy. Neighbourhood Plans and Neighbourhood Development Orders are made by a referendum of the eligible voters within a neighbourhood area.

Registered Provider (RP)

Technical name for a body registered with the Homes England. Most affordable housing providers such as Housing Associations are RPs.

Section 106

Planning obligation under Section 106 of the Town and Country Planning Act 1990, secured by a local planning authority through negotiations with a developer to offset the public cost of permitting a development proposal. Sometimes developers can self-impose obligations to pre-empt objections to planning permission being granted. They cover things like highway improvements or open space provision.

Sequential Test

An approach to planning decision making which may require certain sites or locations to have their development potential fully considered before moving on to consider others. The approach could apply to retail development, the use of previously developed land and/or the use of land at risk from flooding.

Special Area of Conservation (SAC)

Designated under the European Union's Habitats Directive to provide increased protection to a variety of wild animals, plants and habitats.

Special Protection Area (SPA)

Sites on land, at water or sea classified under the European Community Directive on Wild Birds as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds.

Strategic Environmental Assessment (SEA)

European requirement assesses the significant environmental impacts of plans and programmes.

Strategic Flood Risk Assessment (SFRA)

An assessment of the probability of flooding within a particular area, in this case for Boston Borough and South Holland including hazard ratings should this occur.

Strategic Housing Land Availability Assessment (SHLAA)

Assesses the suitability, availability and deliverability of land that have been promoted as sites for housing development

Strategic Housing Market Assessment (SHMA)

Assessment of the local housing market, which studies the supply and demand of housing, the need for affordable housing and the affordability of the local housing market

Strategic Industrial Location (SIL)

Strategic Industrial Locations are designated in the London Plan. SILs exist to ensure London provides a sufficient number of quality sites in appropriate locations to meet the needs of industrial and related sectors, such as logistics, waste management and environmental industries, utilities, wholesale markets and so on.

Strategic Planning

The overall vision and policies for the planning system in an area. Lays out what an area wants development to accomplish.

Supplementary Planning Document (SPD)

A documentary which elaborates upon a policy(ies) of the Brent Local Plan to provide additional guidance for a particular topic or type of development.

Supplementary Planning Guidance (SPG)

Published by the Mayor of London SPGs provide additional details on policies set out in the London Plan. They are also used if a rapid policy response is needed to an emerging issue.

Sustainability Appraisal (SA)

An assessment of the environmental, social, and economic impacts of a Local Plan to check that the plan accords with the principles of sustainable development.

Sustainable Development

An approach to development that aims to allow economic growth without damaging the environment of natural resources thereby development which 'meets the needs of the present without compromising the ability of future generations to meet their own needs.'

Town and Country Planning Act 1990

Currently the main planning legislation for England and Wales is consolidated in the Town and Country Planning Act 1990: this is regarded as the 'principal act.'

Tree Preservation Order (TPO)

An order made by a local planning authority to protect a specific tree, a group of trees or woodland. TPOs prevent the felling, lopping, topping, uprooting or other deliberate damage of trees without the permission of the local planning authority.

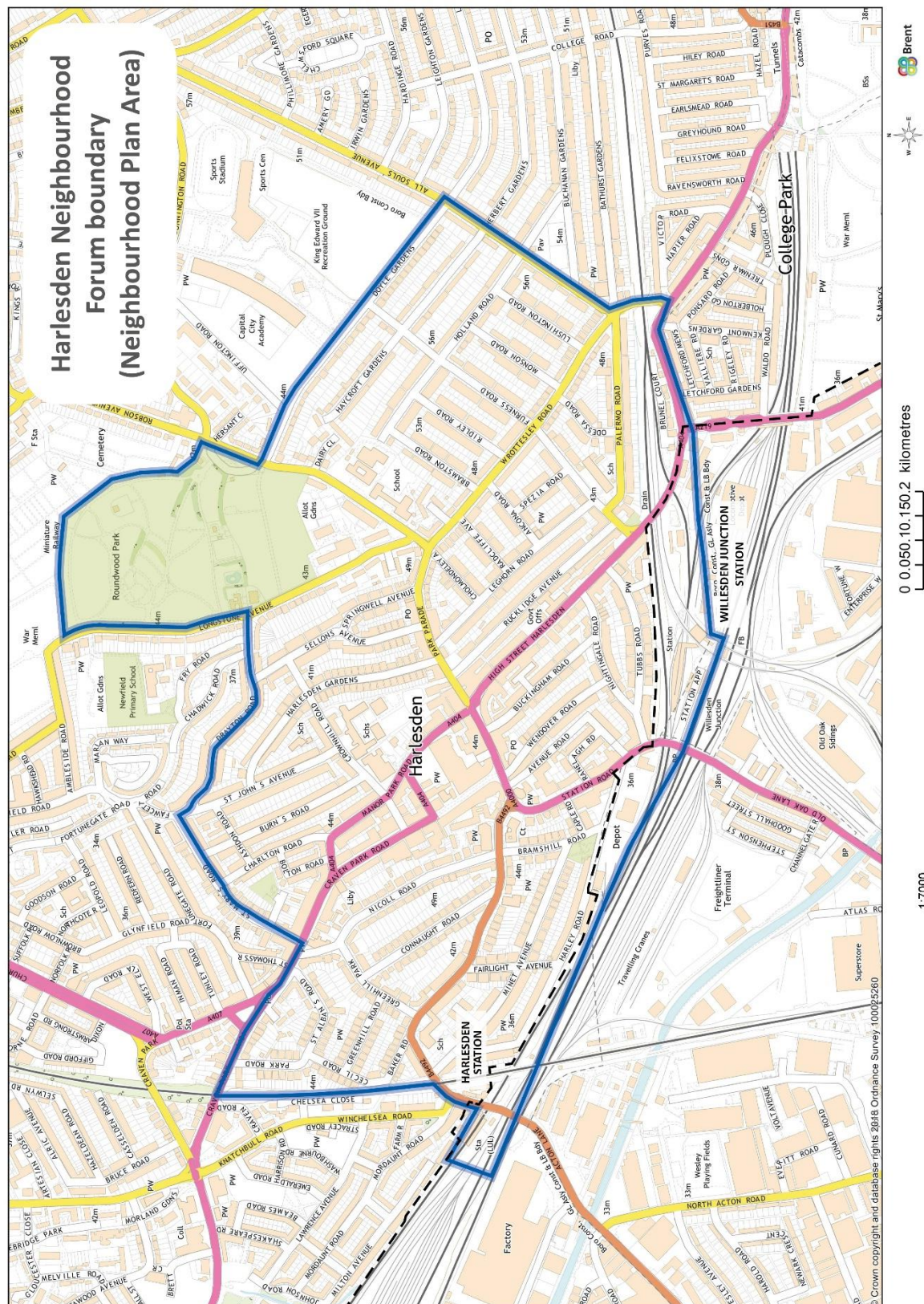
Use Classes Order (UCO)

The Town and Country Planning (Use Classes) Order 1987 (as amended) defines the categories of use of buildings or land for the purposes of planning legislation. In most cases, planning permission must be obtained to change the use of a building or land to another use class.

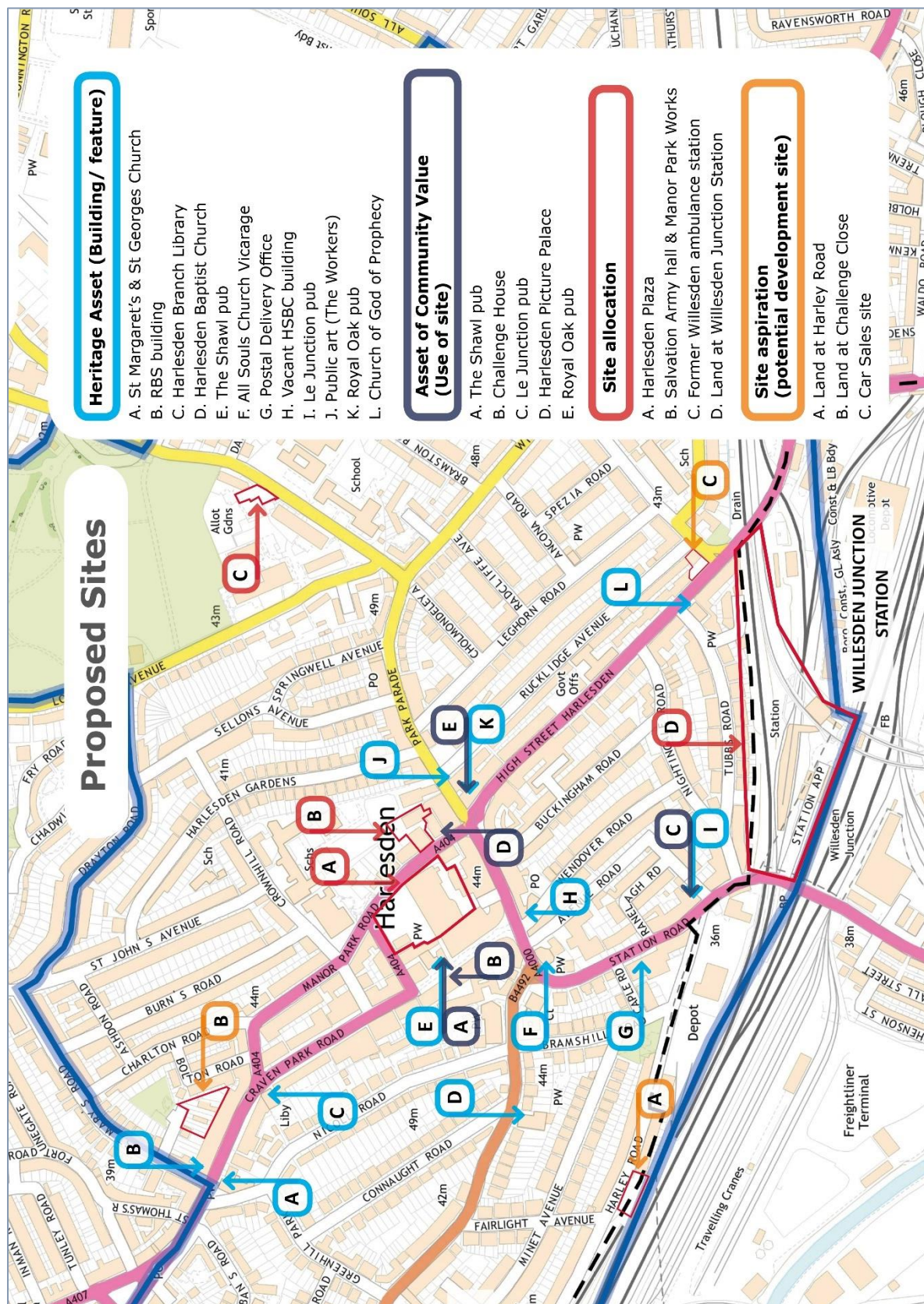
Windfall

Sites which have not been identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.

Appendix B – Neighbourhood Plan Boundary



Appendix C – Proposed sites for development or protection (See Policies H1, CF2, E4 and Community Aspiration 4)



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