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**OPDC Draft Local Plan
Regulation 19 Consultation, July-September 2017
Harlesden Neighbourhood Forum Response**

Introduction

Harlesden has a vibrant town centre with a wide variety of shops, cafes and other town centre uses catering to its varied local community. 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 total population.

The Harlesden Neighbourhood Forum was designated in July 2015 in order to involve the local community in preparing a Neighbourhood Plan which would address the planning problems in the area, such as those outlined above. The Forum is made up of more than 80 community members representing residents, businesses, voluntary organisations and faith groups within Harlesden. It is now at the stage of revising the draft Neighbourhood Plan in light of comments received during public consultation.

The Harlesden Neighbourhood Forum has always been generally supportive of the regeneration proposals for Old Oak, subject to careful consideration being given to how potential adverse impacts upon Harlesden can be avoided or mitigated. Indeed, with good integration between Old Oak and Harlesden town centre it is likely that benefits will flow to the area. The primary consideration of the Forum, as expressed in its response to consultation on the draft OPDC Local Plan in 2016, has been the need to integrate Harlesden with the new development immediately to the south so that there may be spin-off benefits to the town centre in particular. Concerns were expressed that the draft Plan did not go far enough in promoting improved links.

Policy P11 Willesden Junction Place

In the Forum's view, the revisions to the draft Plan have reduced the prospects of Harlesden capturing regenerative benefits from Old Oak, with potentially damaging consequences for Harlesden in the future because of impacts from new town centre development at Old Oak. In particular, the new alignment of the High Street, as shown in Fig 4.50 showing it continuing east from the square in front of Willesden Junction station, is effectively taking potential spin-off trade for Harlesden further away from the centre. This is at odds with the intention set out in the Old Oak and Park Royal OAPF, November 2015 which stated that "*Town centre uses along Old Oak High Street must connect to Willesden Junction Station and on into Harlesden Town Centre. This is required to improve connections between Harlesden and Old Oak*". The OAPF was clearly planning for the main link to Harlesden to be the obvious short and more direct route to the heart of Harlesden town centre via Station Road. This remained the primary route to Harlesden in the draft Local Plan published in 2016. Both of these earlier plans clearly indicated that there were to be active frontages at Willesden Junction station which would have helped to facilitate movement of people between Old Oak High Street, Willesden Junction station and Harlesden town centre. The

current proposals include none of these and, in fact, encourage pedestrians to access Harlesden from Harrow Road rather than Station Road, a significant increase in the walking distance. There is no justification provided in the Plan for extending the High Street eastwards to Harrow Road.

The importance of good linkages, both from the new High Street and Willesden Junction station to Harlesden, cannot be overemphasised. As the OPDC's Retail Needs and Leisure study concludes, *"the majority of the centres within the hierarchy will not be adversely affected"*. It goes on to say, *"However, simply due to the geography of the development, we do consider that there are potential threats to Harlesden..."*. It then goes on to describe, under the heading 'Threats to Harlesden', how existing linkages are poor and emphasises the importance of good links. It says:

"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".

Although it does not state by how much links have to be improved, it is clear that this would have to be very significant given that they say it is "critical" that they are improved. The study goes on to say that when addressing linkages, the following need to be considered:

- Type of link
- Attractiveness of link
- Function of link

The study also says *"The challenge will be to ensure that Harlesden properly benefits from the development"*. In drawing up its new Neighbourhood Plan the Harlesden Neighbourhood Forum has always been mindful of the need to link with new development at Old Oak and to improve the attraction of such links, including to and around Willesden Junction station. The Forum also recognises the need for Harlesden town centre to be complementary to development within Old Oak and that significant improvements to the town centre are needed if Harlesden is to seize the opportunities delivered from the new developments at Old Oak. The Neighbourhood Plan, consequently, has focused on improvements to Station Road and to regenerating the core of the town centre

It appears that the importance of a good link has not been taken into account in revising the Local Plan. It is accepted obviously that the new bridge link across the West Coast Main Line will substantially improve the pedestrian link from Old Oak to Willesden Junction and the plan for a public square in front of a new entrance to Willesden Junction station will help draw people to the area. However, this is insufficient in itself. The Local Plan should revert to the principal link through to Station Road with active frontages adjacent to it.

There is a discrepancy between Fig 3.8, which shows the High Street connecting westwards to Station Road and Figure 4.50 on Willesden Junction Place, where it is absent. As indicated above, the Forum think it is critical that the High Street should make a good, attractive connection to Station Road.

Willesden Junction Station

Willesden Junction station, as well as a key access point to the proposed redevelopment of the northern part of Old Oak is also, and has been since it was opened, the main public transport access point for Harlesden. It is important for the future of Harlesden that any redevelopment and improvement to the station is of major benefit to those who wish to travel to or from the town centre. It is acknowledged that policies and proposals in the Local Plan, including a new bridge across the West Coast Main Line and a new public square to the east of the station, as illustrated in Figure 4.50, will improve the currently very poor access from Harrow Road to the east and from Old

Oak to the south. However, there appears to be very little proposed to improve access to and from the west and Harlesden town centre. Policy “*supporting early development on the western side of Willesden Junction station that contributes to a coordinated delivery of Willesden Junction Station upgrades, the enhancement of Station Approach and new connections across this Place*” is welcomed. Once again though, it is considered that this does not go far enough. Policy should be that the High Street is proposed to be diverted west in front of the station to join with Station Road and this should be shown in the diagram.

The Forum is aware that no final decision has been taken yet on the preferred configuration for re-modelling the station. However, the key principles for development in the area should not be solely driven by the station design. The future of Harlesden as a town centre is at stake so first considerations should be how the Place can be developed and improved for the benefit of the wider area. For example, it is the Forum’s view that some over station development at the western end with active frontages and the provision of a new entrance facing onto Station Road would bring benefits to Harlesden and its community.

Policy is considered unsound on the grounds that it is not positively prepared or justified.

Changes Sought

High Street to be shown on Figure 4.50 going westwards from the proposed new square and linking with Harlesden town centre at Station Road. High Street should not be taken east to Harrow Road

Entrance to the station to be shown close to Station Road.

Policy E1: Protecting Existing Economic and Employment Functions

Policies Map

The Local Plan should also plan for future development that will facilitate improvements to the link along Station Road. In particular the frontage of the land designated as part of a Strategic Industrial Location (SIL) where the bus depot is located which is within the OPDC Local Plan area. This land currently has, along part of its length, shops and cafes (i.e. active frontages) facing onto the road. Behind is the bus depot. The bus depot site has been identified as having a high environmental impact by the OPDC’S Industrial Land study. It has residential property nearby but, more importantly for establishing a good link between Harlesden town centre and Old Oak, it has its exit/entrance on Station Road causing severance to the free movement of pedestrians along the road. It is the Forum’s view that this land should not be designated as part of the SIL for the following reasons.

The bus depot site and adjoining land is not appropriately designated as SIL. It is effectively an isolated site because of the railway tracks to the south dividing it from the rest of Park Royal. It is clearly not part of Park Royal but, rather, part of Harlesden. It is adjacent to a residential area, adjoins Harlesden town centre and there are shop units on the Station Road frontage which are designated as SIL. There is a small derelict industrial building to the west of the depot which is also designated as SIL (although it is not clear from OPDC Local Plan Map whether part or none of this site is within the OPDC area). As the London Plan explains in paragraph 2.80, “*SILs are given strategic protection because their scale and relatively homogenous character means they can accommodate activities which elsewhere might raise tensions with other land uses*”. This site clearly raises tensions with other land uses, including residential and town centre uses, and particularly with a link which it is critical to improve so that it is made much more attractive to pedestrians and other road users. The identification of the site as having a high environmental impact in the OPDC’s Industrial Land Review, referred to above, shows that it raises tensions with other land uses.

If the land designated as SIL were to be redeveloped under current policy then replacement shops or cafes on the Station Road frontage would be unacceptable under both the proposed OPDC Local Plan and current London Plan policy. Policy E1 of the draft Local Plan ensures that *“proposals are comprised of SIL compliant broad industrial type uses”*. OPDC officers have suggested that any development facing onto the road could comprise ‘Positive Frontage’. However, the OPDC Local Plan definition of positive frontage suggests that this would not be anything that would help attract people to Harlesden and would be a step back from the current situation. Together with the continued operation of the bus depot, this would present a long stretch of frontage that would not encourage people to make the trip into Harlesden town centre.

Of course any de-designation of the land as SIL does not mean it would be immediately lost as industrial land or as the location of the bus depot which will no doubt continue operating there for many years. However, it would allow for the site to be redeveloped in the long term if the bus depot could be satisfactorily re-located nearby. It must be possible, and it must be within the powers of the OPDC, to allocate land that is likely to be available for occupation by alternative users after completion of HS2 construction. Such a site, for example, exists immediately on the other side of the railway tracks from the bus depot, i.e. the former freightliner terminal site which is to be used by HS2 during construction of high speed rail link. If a satisfactory relocation of the bus depot could be achieved then redevelopment in an appropriate way would allow for a much better link to be provided by removing the access point to the bus depot and by providing an attractive and active frontage to Station Road, as well as providing the opportunity of contributing to the future of Harlesden with alternative uses.

A recent review of industrial land for the Mayor of London (London Industrial Land Demand, June 2017) concludes that industrial land release across London in recent years has been in excess of benchmark guidance. Their analysis of the industrial land pipeline for West London shows that a substantial amount (75.9 ha) of the planned release is from Ealing and Hammersmith & Fulham because of Old Oak, although Hillingdon is also showing a substantial release of 46 ha through the Local Plan. A consequence of the substantial releases of industrial land is that the Mayor has been advised to reduce the industrial land release benchmark to 9.3 ha per annum across London, a considerable reduction on the 2011 benchmark. Clearly the release of industrial land needs to slow down. However, the use of land is always a balancing act between demanding uses and priorities. The need to slow the release does not mean that there should be a blanket refusal to release any industrial land and certainly does not mean that there should be continued rigid adherence to current boundaries of SIL where it is logical to adjust boundaries and there may be overriding benefits to that adjustment. It is contended that the de-designation of a further 1.2 hectares of inappropriately designated SIL would not reduce the land supply for industry in any significant way. In fact it would not reduce it at all because the bus depot would continue to occupy the site but the frontage could be redeveloped for uses which are appropriate to the key gateway to Harlesden town centre.

London Plan para 2.84 states that *“Development in SILs for non-industrial or related uses should be resisted other than as part of a strategically co-ordinated process of consolidation”*. A major regeneration scheme such as Old Oak, and the preparation of a new Local Plan to facilitate it, provides an opportunity that is unlikely to be repeated for a strategically co-ordinated process of consolidation in this area. If the opportunity to regularise the boundary of the SIL is missed it is a near certainty that Harlesden and its residents will continue to suffer for many years to come from the high environmental impact of this site, and with no prospect of relief from it in the future. Park Royal should be consolidated now on sensible boundaries that will not require review in the future.

The Plan is considered to be unsound on the grounds that it is has not been positively prepared or justified.

The following changes are sought:

Land north of the West Coast Mainline bounded by Harley Road and Station Road to be de-designated as part of a Strategic Industrial Location.

Policy TCC1 Locations for Town centre uses

Policies Map

The draft Local Plan accepts, in paragraph 10.22, that *“there is a need for a greater degree of scrutiny of town centre use proposals as they emerge, to ensure that any proposals complement designated centres”*. Consequently, there is a requirement for a full retail impact assessment for those applications that are caught by a relevant threshold in policy. However, there is no policy that requires individual development proposals not to have an unacceptable impact, either by themselves or cumulatively with other developments, upon existing town centres. The mere requirement for an impact assessment provides no safeguard in the event of potential adverse impacts on Harlesden town centre for example. As with out-of-centre development, and because of the potential threats to Harlesden and Ealing outlined in the Retail and Leisure Needs Study, policy should state that where it is likely to have a significant adverse impact on the vitality and viability of an existing centre it will be refused.

Assessment of the potential impact on existing town centres is contained in the OPDC’s Retail & Leisure Needs Study. An early published version of this, in February 2016, concluded that there was a threat to Harlesden based on a total new A Class floorspace in the OPDC area of 64,100 sq metres up to 2037. The total new A Class floorspace has now risen to 68,500 sq metres in the latest published version of the Study (Nov 2016).

There is also a separate assessment of what the potential floorspace for town centre uses within the OPDC area is. This suggests, in table 6.11 of the study, that there is potential for a total of 65,250 sq m of commercial floorspace. The Forum has some concerns that the assessment of potential floorspace within the OPDC area may be an underestimate. The estimate is based on urban design work that was undertaken before the first draft plan was published in February 2016. Since then additions appear to have been made to active frontage, as shown in the Places section of the Plan. For example, the High Street has subsequently been extended both east to the Harrow Road at Willesden Junction and west to North Acton from Old Oak Common Lane. Additionally, some clusters show increases in active frontage, e.g., at Scrubs Lane /Harrow Road where it appears that the active frontage has increased from about 150 metres in length to about 500 metres. The total length of active frontage upon which the Retail & Leisure Needs study assessment was made remains the same and is set out in paragraph 6.6.2 of the study. At the very least there needs to be some clarification of how the diagrams and plans showing active frontage are reflected in the estimates of town centre floorspace, otherwise there can be no confidence that the amounts to be delivered will not exceed that proposed. This is important because an extra 350 metres of active frontage at Harrow Road/ Scrubs Lane could result in over 5,000 sq metres of town centre floorspace, which is very significant so close to Harlesden town centre.

There is a discrepancy between the Policies Map and the map in Fig 10.2 of the Town Centres chapter showing the Major Town Centre. The Policies Map shows the town centre designation diverted east to join with Harrow Road whereas Fig 10.2 shows the town centre also forking west past Willesden Junction station to join Station Road. The Forum’s view, as expressed above, is that

the town centre boundary should connect with Harlesden at Station Road, and town centre development proposals in the OPDC Local Plan should also reflect this.

The aspect of the Plan dealing with locations for town centre uses is considered to be unsound on the grounds that it is has not been positively prepared or justified.

Changes sought are:

Policy TCC1 should state that development proposals should not have an unacceptable impact, either by themselves or cumulatively with other developments, upon existing town centres.

A more detailed breakdown of potential commercial floorspace by location, including clusters, should be provided.

The Policies Map should be amended to show the Major Town Centre aligned west in front of Willesden Junction station, to join with Harlesden town centre at Station Road.

P1: Old Oak South, P2: Old Oak North, P11: Willesden Junction

Harlesden Neighbourhood Forum welcomes the recognition from OPDC of the threat to Harlesden town centre from new town centre development at Old Oak. To help mitigate this, policies P1, P2 and P11 require that, in bringing forward development proposals, consideration should be given to the need to be *“Supporting neighbouring Harlesden district town centre by including a Harlesden Enhancement Strategy within any submitted Town Centre Uses Statement where the proposal in Old Oak South provides over 5,000 sq m of town centre uses”*. Supporting text to the policies states that potential financial contributions are to be discussed with OPDC and London Borough of Brent. This is insufficiently firm and it is the Forum’s view that guidelines should be drawn up and set out in the Plan which will have to be adhered to in determining the level of contributions that need to be made

The Forum is also concerned that the level of development at which a Harlesden Enhancement Strategy, and therefore contributions, will be required is too high at 5,000 sq m. It is possible that most development will be brought forward in smaller plots and, those close to Harlesden in particular could have a harmful impact at below this level of development. The threshold should be 2,500 sq m as this is the level of development that the NPPF states should be the default level for impact assessment where a level has not been set. The potential for this level of development to have a harmful impact is acknowledged elsewhere in the Plan. Policy TCC3 requires that A Class development proposals of over 2,500 sq m outside of the Old Oak High Street major town centre are accompanied by an impact assessment.

Policies P1, P2 and P11 are considered to be unsound because they have not been positively prepared nor will they be effective.

Changes sought are the inclusion of clear guidance on the determination of appropriate contributions to Harlesden and a reduction of the threshold level to 2,500 sq m.

Policy H2: Affordable Housing

The Forum is concerned that only 30% of the affordable housing target of 50% should be at London Affordable Rent (LAR). The OPDC’s own SHMA established an 86% need for LAR within the affordable housing requirement. LAR is the rent level that comes closest to providing a genuinely affordable rent level for low earning households. Incomes in Harlesden are markedly lower than London as a whole. A median household income for Harlesden ward of £27,030 in 2012/13 was 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. The

unambitious target for LAR does not go far enough in addressing the housing needs of those on low incomes in Harlesden and other local communities.

It is also contended that the setting of a target of 30% affordable rent and 70% intermediate is not in accordance with Government policy set out in the National Planning Policy Framework (NPPF), nor is it in general conformity with the London Plan. The National Planning Policy Framework (NPPF) in paragraph 47 states that local planning authorities should “*ensure that their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area*”. It also states in paragraph 50 that local authorities should “*plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community*”. The OPDC’s own SHMA established an 86% need for LAR within the affordable housing requirement. Policy 3.11 of the London Plan states that 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale.

Policy H2 of the Plan is considered to be unsound because it is not consistent with national policy, positively prepared or effective.

Changes sought are the substitution of 30% by 60% and 70% by 40% in policy H2.

Policy TCC4 Social Infrastructure Provision

Paragraphs 10.30 and 10.31 in the supporting text set out the on-site requirements for school provision in the Old Oak regeneration area as well as identifying locations where these schools should be provided, apart from the all through school for which it is indicated there is no need within the Plan period. However the Forum is concerned that if early consideration is not given to the likely location and potential site of the all through school, then as development is brought forward in the area potential locations for its provision may be lost to alternative development, with the possibility that no appropriate site would be available when it is needed. In the Forum’s opinion a site or location for this proposed new school should be identified in the Plan. If a better, alternative option becomes available during the lifetime of the Plan then a review of the Plan to allocate an alternative site would be justified.

The assessment of need for school places is based in part on an estimate of school places that will be available in existing schools beyond the Plan area. Table 10 of the Education and Health Needs Study sets out the net additional capacity that is assumed to be available from surplus capacity and expansion projects. One of the schools listed is Harlesden Primary school with a current surplus of 303 places. The Forum is concerned that the current spare capacity in Harlesden Primary School is being identified as being available to meet need within Old Oak. Harlesden Primary School expanded from 1 to 3 forms of entry as recently as 2016. This expansion was necessary to meet local need for new school places identified by Brent. When originally planned, it was not anticipated that the full additional capacity would be taken up until 2020. It is inappropriate that current spare capacity in existing schools outside the area should be considered as available to meet the needs of the growth in child population in Old Oak.

This aspect of the Plan is considered to be unsound on the grounds that it is not positively prepared or effective.

Change sought is that the Plan should identify additional locations or sites for new school provision.