

## Harlesden Neighbourhood Forum Committee Meeting

<b>Date and time of meeting:</b>	14 <sup>th</sup> September, 6.30 – 8.00pm
<b>Location:</b>	Crisis , Ajax House, 16a St Thomas's Road, Harlesden
<b>Attending:</b>	(LN), Sumathi (Secretary) (SP), Paul (Treasurer) (PA), Atara (Vice Chair) (AF), Mark (MC), Amanda (AD), Ken (KH) Hannah (HC)
<b>Apologies:</b>	Leao (Chair), Marco

### Meeting notes

Agenda item	Discussion (Key discussion points and agreed points)	Actions	Status
The committee meeting was quorate with 5 members present (minimum 5 required by the constitution), as well as Ken Hullock.			
1.	<p><b>Welcome / Introduction</b></p> <ul style="list-style-type: none"> <li><b>AF</b> Review of meeting agenda and objectives and minutes from previous meeting on 21<sup>st</sup> June</li> <li>Need a replacement for Kathryn on the committee &amp; need to better reflect diversity</li> <li><b>MC</b> spoke to Sam re becoming working group lead for transport</li> <li><b>HC</b> to speak to local pubs about draft plan</li> </ul>	<ul style="list-style-type: none"> <li>AF/ SP to explore possible solutions around replacing Kathryn and addressing diversity, linking with LN</li> <li>Sam Dilliway and Paul Gladwell are both keen on being involved. Invite them to forum meeting on 19<sup>th</sup> October so they can see what it's all about and meet people. (HC)</li> <li>Complete before next committee meeting (HC)</li> </ul>	<p>SP has raised with Nick and he would like to discuss further <b>TBC</b></p>

2.	<p><b>Response to draft plan comments from Brent, OPDC and Tfl</b></p> <ul style="list-style-type: none"> <li><b>KH</b> took committee through responses to draft plans from the three parties. Discussion had on how to proceed</li> </ul> <p><b>Note:</b> See Ken's comments on the responses in the appendices below in this document</p>	<p><b>Bus Depot</b></p> <ul style="list-style-type: none"> <li>Ken proposed that this is removed from site proposals in plan (<b>KH</b>)</li> <li>We should press on with making formal objection to OPDC Local Plan when it reaches public examination phase (likely to be summer 2017). KH offered to present formal objection.</li> <li><b>Agreed</b> to keep statement of our position in plan narrative and continue to liaise with OPDC on this</li> </ul> <p><b>Housing</b></p> <ul style="list-style-type: none"> <li><b>Agreed</b> to remove policy on smaller units and refer to Brent's policy (<b>KH</b>)</li> <li>Ask Brent &amp; OPDC if they can help provide more up to date data (<b>SP &amp; KH</b>)</li> </ul> <p><b>Town Centre</b></p> <ul style="list-style-type: none"> <li>Brent's comments suggest that there will inevitably be a negative impact on Harlesden town centre from new retail development in Old Oak.</li> <li><b>Agreed</b> to challenge Brent and OPDC on negative impact and whether the neighbourhood plan should include mitigation measures</li> </ul> <p><b>Transport</b></p> <ul style="list-style-type: none"> <li>Para 7.20 – Need clarification from Brent as to what they want us to confirm (<b>SP &amp; KH</b>)</li> <li>Para 9.44 – Wording to be changed – <b>agreed (KH)</b></li> </ul>	
3.	<p><b>Timelines for public consultation</b></p> <ul style="list-style-type: none"> <li>The committee decided to stick the current timeline for delivery of the plan (all)</li> </ul>	<ul style="list-style-type: none"> <li>Soft launch of plan at October forum meeting</li> <li>Formal launch of public consultation at December meeting.</li> </ul>	
4.	<p><b>General Forum meeting -19<sup>th</sup> October</b></p> <ul style="list-style-type: none"> <li>The meeting will include an update on the plan, presentation by Brent on the OBR and an interactive session to follow with Q &amp; A</li> </ul>	<ul style="list-style-type: none"> <li>Promote event via social media, flyers, posters and create an event on Facebook, also update forum website with the details (<b>HC</b>)</li> <li>Organise venue – Newman Catholic College (<b>HC</b>)</li> <li>Organise refreshments / snacks (<b>HC</b>)</li> </ul>	Complete Complete
5.	<p><b>Strategy Workshop / Away day</b></p>	<ul style="list-style-type: none"> <li>Send Doodle Poll to see which dates work for the committee (<b>HC</b>)</li> <li>Ask community researchers to attend away day (<b>HC</b>)</li> </ul>	Complete

	<ul style="list-style-type: none"> <li>Will take place end Oct / early Nov. Facilitated by Steve Lee (Crisis Senior Campaigns Officer)</li> </ul>		
6.	<b>AOB</b> <ul style="list-style-type: none"> <li>All signatures and information received for new bank account form from signatories present.</li> </ul>	<ul style="list-style-type: none"> <li>Obtain signature and necessary info from Leao to complete new form <b>(HC)</b></li> </ul>	
7.	<b>December General Forum Meeting</b>	<ul style="list-style-type: none"> <li>Date to be decided – Doodle poll to be sent <b>(HC)</b></li> <li>Christmas theme / activities <b>(HC)</b></li> </ul>	Complete
8.	<b>Date of next committee meeting</b>	<ul style="list-style-type: none"> <li>Currently scheduled as 10<sup>th</sup> January but may need to bring forward if a general forum meeting is to take place in December <b>(all)</b></li> </ul>	

## Appendix A

### Brent Comments

	Brent Comment	KH Response
General - The need for Strategic Environmental Assessment (SEA)	SEA is more likely to be required where sites are over 0.5ha, or the proposed development is of a greater scale to the current use or markedly different in nature. The majority of site proposals in the Plan are for small sites and do not involve a significant change in scale or use, or they are sites which are site allocations and have already been subject to SEA. However, proposals for the bus depot site would result in change in use and scale, on a site over 0.5ha. This proposal would therefore give rise to the need for SEA. Before we finalise the SEA Screening and recommendation we need to discuss your proposals for this site with the OPDC.	No requirement for an SEA without the bus garage site. An SEA for the bus depot site alone would not be an onerous piece of work though.
General	Need to include details of plan period.	Accept. Include statement that Plan is for 15 years
1.1	Would be beneficial to include a larger more detailed plan in the appendix, including road and street names. We can provide a larger scale plan.	Accept. Obtain larger scale plan from Brent.
Vision	Vision & Objectives – would be good to include something about achieving the highest quality design for new developments, taking cues from the local context in terms of scale and materials in particular within and neighbouring the conservation area. Also include something about public realm – high quality and robust materials, adaptable and accessible spaces for all ages including those with mobility issues.	Accept. Include something about design quality reflecting local context.
2.10	Revise wording “Of these 3 have been developed so that leaves the two below.” To possibly ‘ Of which three have been developed, the two remaining sites are detailed below’	Accept.
2.11	Missing word – “This site comprises the Tesco store together with neighbouring shops and car park as well as some High Street properties including the Methodist Church.”	Accept.
2.16	Brent Council to send an extract of the amended policies map with updated town centre boundaries for inclusion in Plan.	Accept.
2.19	Final sentence can now be updated to state the OPDC Local Plan was consulted on during February and March 2016.	Accept.
4.1	Appreciate that getting up to date statistics is always a problem in documents like this but it might be worth trying to pick up more	Accept and seek to include more up-to-date figures.

	<p>recent homelessness figures. In Brent, there was a downward trend in the number of households accepted as being homeless and in priority need over the decade to 2011. There were 281 such households in the first quarter of 2001 which reduced to 71 households by the first quarter of 2011, a net reduction of 210 households. However, this has since risen to 186 in the first quarter of 2015. There has been a downward trend in households living in temporary accommodation. There were 3,599 such households in 2001, including 585 in bed and breakfast accommodation and a further 194 in hostels; this had reduced to 3,019 in 2011, a net reduction of 580 households, though again considering more recent figures, this had increased to 3,161 households by the first quarter of 2015. Brent no longer has the largest number of households in temporary accommodation and the numbers are predicted to fall further through the TA Reform Plan against a general upward trend in London. On the other hand, the overcrowding figures are likely to have got worse.</p>	
4.9	<p>The Brent SHMA identifies an annual housing need of 1,826 units, however, taking into account housing land availability (the boroughs capacity to deliver more housing) an annual target of 1,525 is identified. Therefore the SHMA isn't inconsistent with Brent's housing target in the London Plan, but does highlight the borough can't meet its objectively assessed housing need in full.</p>	Accept.
4.19	<p>Net housing completions Harlesden 2010-2015 (source: LDD).  2010-11- 11 units  2011-12- 47 units  2012-13 – 5 units  2013-14 – 24 units  2014-15 – 2 units</p>	Accept & include
4.20	<p>From summary of evidence base unclear how recommendations 4&amp;5 have been arrived at. Is there evidence there is a need for smaller starter homes in Harlesden? Seeking an increase in smaller homes seems at odds with earlier text which highlights issues of overcrowding and the need for family sized dwellings. Is there a suggestion young people are living with families in overcrowded homes as they can't access smaller affordable dwellings? Would be helpful to elaborate in this section how evidence base has fed into these conclusions.</p>	<p>The evidence from the HNA states:</p> <p><i>Data for Harlesden shows extremely high rates of one room household growth in recent years, but also very high rates of two to five room household growth.</i></p> <p><i>There is a high level of single person households and a slightly lower than average number of family households.</i></p> <p><i>One person households have been increasing at a particularly fast rate.</i></p> <p>This implies that there is a greater than average need for smaller homes.</p>

		Point 5 is merely repeating a recommendation from the HNA. It is not reflected in policy. The issue of whether or not to provide a small proportion of starter homes is one of whether or not to make available a range of new homes to help ensure mixed and balanced communities.
4.23	Sentence on 1,525 housing target needs to be amended to reflect that the target is in part informed by housing need. 'This is informed by both the borough's objectively assessed need for housing and the availability of sites to deliver new homes.'	Accept.
H1	It needs to be made clear that other uses are also a key priority for certain sites. For example employment uses at Willesden Junction, commercial and community uses on Harlesden Plaza etc. Needs clarification that housing is to be part of a suitable mix, and to cross reference site proposals. 205 High Street, junction with Furness Road, currently used for second-hand car sales, could be developed as housing with ground floor retail. Or could be a prominent public open space.	Accept. Amend policy wording.  Accept new site?
H2	As the density matrix forms London Plan policy it applies across the neighbourhood area. Therefore you don't need to repeat it in policy here, but could instead cross reference London Plan policy 3.4 and the accompanying matrix in table 3.2. The policy will apply 450-700hr/ha across the neighbourhood area. Parts of the neighbourhood area to the north fall within PTAL 2 and 1a, and therefore in line with the matrix the upper limit would be 450hr/ha. Justification will be needed to go beyond the matrix in these areas, which are characterised by low storey terraced and semi-detached properties.	The point is that the policy doesn't merely repeat the density matrix but is proposing that a minimum of 450 hr/ha across the area. Only a very small part of Harlesden NP area is below ptal2.  The London Plan states that "It is not appropriate to apply Table 3.2 mechanistically" and goes on to say "Its density ranges for particular types of location are broad, enabling account to be taken of other factors relevant to optimising potential". The justification is in the overriding need for new housing locally.
4.34	For consistency with terminology in NPPF and London Plan would be beneficial to title section 'custom and self build'. There are currently 19 entries on Brent's self and custom-build register, suggesting there is demand in the borough. We would welcome the neighbourhood plan identifying potential sites to help meet demand, should the land owner be open to this.	The primary issue here is whether there is an opportunity to progress a Community Land Trust. It is not about self-build which I think is what the comment is directed at.
H3	Brent's policy already seeks a high proportion of 1 and 2 beds - 75% 1 to 2 bed, and 25% family 3 bed +. Therefore this policy isn't needed. There is a risk it could be interpreted that we don't need family housing in Harlesden, when evidence on overcrowding and from the Brent SHMA indicates this is a key need. Maybe an amended policy	Accepted. Refer to Brent policy.

	<p>can note it will not always be possible to deliver 25%+ 3 bed units in denser town centre developments, and in such cases a higher proportion of 1 and 2 bedroom units will be acceptable (able to meet need identified under 4.35) – but that is just common sense and happens anyway.</p> <p>Can we get under the skin of 4.35 and why has this happened? E.g. if this is due to conversions of family houses to flats, then that is hardly justification for more smaller units.</p> <p>Will a concentration on 1 &amp; 2 bed bring with it its own issues, e.g. overconcentration of single/younger people? Lower income households?</p>	<p>It appears that AECOM in the HNA has concluded that there is already an overconcentration of single people, evidenced by the rapid growth of 1 person households, which is why the policy response was proposed by AECOM.</p> <p>There is a lack of definitive evidence, with only the census data to go on. Conversely, the level of overcrowding, and the likelihood that this will have worsened since 2010, suggests a need for larger units. It seems to me that affordability is the real issue. Not sure at this stage whether we should just refer to recommendations from the HNA that we like.</p>
H4	<p>Given Harlesden's considerable housing need suggest caveating that the conversion of ground floor units to commercial should result in the loss of no more than one dwelling, and residential above the shop should be retained.</p> <p>This policy would prevent people from converting flats into larger family dwellings. Is this the intention? Currently due to the need for larger family housing, Brent allows the loss of one unit where it would create family housing (3beds +).</p>	<p>Accept.</p> <p>Brent policy is for no loss of residential accommodation. London Plan also states that housing loss should be resisted. Could add word “floorspace” after housing in policy.</p>
4.38	<p>Based on average local wages will young people be able to afford starter homes (which could be up to £450,000), will they meet a local need?</p> <p>In addition we will not be able to specify who gets access to starter homes, so while they might be beneficial in principle there is no guarantee that Harlesden residents will get them unless providers adopt some form of prioritisation.</p>	<p>The assumption is that there are some people living locally who would wish to take advantage of the discount. It would be in the interests of achieving mixed and balanced communities, and meeting the aim set out in Brent’s Core Strategy “to maintain and provide a balanced housing stock in Brent”.</p> <p>There is no policy in the NP requiring starter homes to be provided.</p>
6.2	<p>This paragraph rightly points out that parts of Harlesden have a leafy appearance but this is something that could quite easily change. Many of the trees are coming to the end of their life expectancy or have</p>	<p>Agreed. A statement to this effect could be included in the Plan.</p>

	<p>outgrown their locations, indeed the trees in the accompanying photo seem to be Limes that take an awful lot of maintenance and are sometimes considered a strain on resources with an overlying desire to remove and replace many of the large mature Limes and other trees nearing their Safe Useful Life Expectancy (SULE), it is imperative that the removal, replacement and addition of new trees throughout the Harlesden area continues.</p>	
CF1	<p>It would be beneficial to include this requirement in one of your site allocations and cross-reference here. Harlesden Plaza seems most appropriate given its central location and the existing allocation. An outcome of the Harlesden OBR is the potential for a community hub. There are plans to test a 'prototype' hub in a location in Harlesden Town Centre, before looking at a longer term solution. This could link with the Forum's aspiration to secure additional community space, and we will keep the forum engaged as plans develop.</p>	<p>Community space is included as one of the land uses to be included on development of Harlesden Plaza. It could be made more explicit that this is a requirement of development.</p> <p>Reference could be made to this.</p>
6.6	<p>For information an updated Brent Playing Pitch Strategy should be finalised shortly. We will forward on to inform your evidence base.</p>	<p>Could include information from this.</p>
E3	<p>In supporting text include information on how shortage of children's play space was arrived at. Have the forum identified any locations for new or improved play space? E.g. Tubbs Road pocket play area. Policy E3 Safer Streets, could be delivered subject to consideration of transportation impacts and engagement of residents. Further discussions needed with Transportation and identification of suitable locations to close off streets. Similar projects have been completed in other nearby areas, Kensal Green, Kensal Rise and Kilburn.</p>	<p>Accept. More explanation needed. Can refer to Fields in Trust standards.</p> <p>Accept. Need to follow up.</p>
6.12	<p>Pleased to see the references to heritage. However, there are a few points below that need addressing. Archaeology. More needs to be said about archaeology in the Harlesden Neighbourhood Plan. It is worth pointing out that Harlesden is one of only 4 Archaeological Priority Areas in the Borough. Archaeology is a material consideration in the planning process. In Brent all planning applications are monitored by the Greater London Archaeology Advisory Service (GLAAS). If the development has archaeological implications it is GLAAS who make recommendations to the local planning department about the appropriate course of action. This may result in an archaeological planning condition. At the very least a desk based assessment will be required which will include a detailed appraisal of available information about a site before a planning application is</p>	<p>Accept.</p> <p>It is referred to though. Don't want to merely repeat what is in the Brent Local Plan.</p>

	<p>submitted or approved. In addition to the Archaeological Priory Area there are also 4 Sites of Archaeological Importance (see Brent policies map <a href="http://www.brent.gov.uk/policies-map">www.brent.gov.uk/policies-map</a>). These include Harlesden House, The Grange, Manor Farm and Sellons Farm. These are local designations that were identified by Wembley History Society in 1988. This local list of Sites is maintained by the Council with a view to give special attention to these Sites where there is known archaeology of Brent's past. Archaeology needs to be included in the visions and objectives. Heritage Assets. - There is not enough about Heritage Assets (listed buildings and the conservation area in particular). It needs a more detailed introduction and a brief description of why they are important. Also identifying what the listed buildings are – Harlesden Jubilee Clock for example. It jumps straight into non-designated heritage assets, and while I am pleased that they are identified, the section (6.12) is confusing and needs re-writing. Mark Price the Council's Conservation Officer is happy to meet and provide further information if this would be beneficial.</p>	<p>Are members of the Committee familiar with these?</p> <p>I don't think we should repeat the list but perhaps mention examples, especially Harlesden Jubilee Clock. Not to me it isn't. Meeting with Mark?</p>
6.13	<p>Include reference to the retention and reuse of historic buildings with strong streetscape character is preferred/ sought etc</p>	<p>Accept</p>
E4	<p>Local Listed Buildings should also include the below: Harlesden Station Restoration Revival Fellowship Apostolic Church, 50 Church Road Harlesden Police Station, 76 Craven Park Road St Joseph's Roman Catholic School, Goodson Road Leopold Primary School, Haweshead Road Royal Mail Distribution Office, 40-44 Station Road Harlesden Telephone Exchange, Station Road All Souls Church Vicarage, 3 Station Road Should Roundwood Park be on this list? It would be helpful if the Plan suggested that an Article 4 Direction was placed on locally listed buildings to prevent demolition without due consideration of replacement. Finally, there is nothing about the protection and promotion of cultural assets – theatres in particular. Harlesden has a theatre in Newman Catholic College and the open air one in Roundwood Park. There should be a clear section promoting cultural facilities in the Plan.</p>	<p>Need to assess whether want these included or not. For example we had deliberately left out Royal Mail Distribution Office because of the potential for regeneration. It seems that Brent planners want us to include the whole of the draft Local List that their senior officers didn't want to progress because of the potential impact on regeneration. Our position is a compromise. Not sure what this is helpful for. Need to discuss with Mark.</p> <p>Not aware of these. Accept?</p>
6.15	<p>As outlined the most important Landscape/ open space issue for Harlesden is creation of a new town park or public square. SSA for Harlesden Plaza is the only realistic way we could deliver this. Suggest defining size of public space to be provided, say 50x50 metres or</p>	<p>Perhaps specify a minimum size.</p>

	<p>60x40 metres, at ground level. This would have benefit of excluding any surface level car parking which is essential if we are to create a town centre park or square of significant size.</p> <p>Land at Challenge Close is mentioned at 4.23 Policy H1, as a potential site for development of new homes. Challenge Close is an existing open space that has been improved recently. It is a backland site with serious ASB issues, it also has community support as the only open space in northern part of town centre. There is nowhere else in that area to provide an alternative open space.</p> <p>Opportunity to deliver new public space as part of Willesden Junction station redevelopment. To be considered further through station study. Forum aim stated at 6.6, 'improvement of southern part of Roundwood Park' can be delivered internally by Brent Council staff, subject to funds becoming available. Consider as priority for Neighbourhood CIL.</p>	<p>Site Proposal makes it clear that this is not the Open Space but land to the south of Challenge Close where there is already some residential development.</p> <p>Can include this.</p>
E6	State explicitly development along gateways should be of the highest quality. It would be beneficial to identify gateways on a plan.	Accept.
E8	Trees are proposed by Policy E8. Tree planting projects are already running in Harlesden with excellent community involvement. The Neighbourhood Forum should therefore put forward any further priority streets immediately. We can use this as an opportunity to draw up a tree planting plan for the entire Harlesden area, note that additional funds will be needed to deliver this.	Accept. Need to identify priority streets. Anyone involved in the tree planting projects?
6.28	At the end of paragraph clarify these should not be out of scale to the local context.	Accept? However, not sure of the wording as any buildings that are taller than their neighbours could be considered to be 'out of scale to the local context'.
E9	For consistency with London Plan policy 7.7 state tall buildings should also be subject to the highest architectural quality being achieved.	Accept.
7.12-7.14	The Employment & Skills Team note your comments, and are interested in exploring potential for training and upskilling of local people and businesses in Harlesden.	Noted. Need to liaise with Employment & Skills Team
LE1	Have sympathy with the wish to retain existing businesses in the area and support the principle. However, in practice it is generally concluded that it is not for the planning system to protect individual businesses, so expect this will come under scrutiny at the Examination. Need also to consider the impact of permitted	Accept. Include revised wording similar to that suggested

	<p>development rights for business premises B1a, B1c and B8 to residential which the Plan is powerless to stop – such a restrictive approach as set out in the Plan is by default likely to lead to change of use rather than redevelopment, perhaps reducing housing delivery and opportunities for improving townscape.</p> <p>In the Old Oak and Park Royal Opportunity Area Framework policy OO1 c states proposals seeking to displace existing employment floorspace from Old Oak should demonstrate how they have worked to find suitable relocation sites or replacement premises, in the first instance, within the OAPF area, then the West London sub-region. Recommend using this policy wording but stating they should look in the first instance to Harlesden, then the wider borough of Brent.</p>	
7.20	<p>Could also refer to seeking appropriate mitigation for Harlesden Town Centre from the impact of retail development at Old Oak.</p>	<p>Such an approach is accepting there will be a significant impact on Harlesden. If it is known that the quantum of floorspace proposed is likely to have a significant harmful impact on Harlesden that requires mitigation then consideration should be given to reducing the quantum of floorspace proposed. At the very least, as the consultants who did the Retail Need Assessment for Old Oak advised, careful consideration needs to be given to ensuring a seamless link between the new town centre at Old Oak and Harlesden town centre. .</p>
7.21	<p>For information Brent Council is taking forward an updated Shopfront SPD which is to undergo consultation later this year.</p>	<p>Noted.</p>
LE2	<p>Could also include reference to retaining shopfront features of architectural merit. Do you want to include anything on forecourt trading? Areas appropriate for outdoor trading and seating?</p>	<p>Accept. Not sure if there's anything to say about forecourt trading and Plan does refer to the possibility of a specialist market in the new town square currently.</p>
LE3	<p>The sequential approach in the NPPF directs town centre development to town centre sites in the first instance. Edge of centre sites are only considered if no town centre sites are available. Work by the Outer London Commission indicates in light of changing shopping behaviour town centres are unlikely to expand at rates previously projected, whilst the OPDC retail needs study highlights retail development at Old Oak will impact on Harlesden's future growth. In this context, and taking into account existing vacancy level, growth of retail floorspace in Harlesden is likely to be limited, making it important to direct any growth to the town centre where it can enhance links with Old Oak. For consistency with the NPPF, policy LE3</p>	<p>The edge of centre referred to was the part of Station Road leading to WJ station. As this is proposed to be town centre then reference to edge of centre can be deleted.</p>

should be amended to either remove reference to edge of centre, or state edge of centre where supported by a sequential assessment.

General town centre –

The Plan could discuss how the distinctiveness of Harlesden’s town centre offer reflects its diverse community. This is a selling point which makes Harlesden distinct from other centres. Could consider identifying character areas within the town centre, for example promoting a cafe/restaurant quarter.

Brent Council is taking forward a paper on how the future health of town centres can be improved around the following eight-point indicators. It would be beneficial to explore how policies in the Plan could link with these indicators.

1. A Sense of Place: identifying and building on unique identity
2. Cleaner, Safer, Greener: through urban design and place-management to create an attractive and welcoming environment
3. Mixed Use: adapting to demand and socio-economic change, to enable housing, commercial workspace, leisure and cultural development alongside retail offer.
4. Accessible: assessing how accessible a town centre is by foot, public transport, cycle and car; enhanced transportations link, improved access to and from arrival points to ensure a well-connected local centre
5. Geographical Catchment: size of the town centre and of its catchment area will help identify its form, function and role how well this relates to local catchment population, taking into account that in some centres, the catchment is beyond those that live or directly work in it. Needs to consider neighbouring areas and visitors from further afield.
6. Digital: make our high streets more discoverable and digitally connected. Engage with online retail, considering infrastructure requirements (e.g. Wi Fi), and understanding future trends (e.g. 3D printing and ‘the internet of things’).
7. Inclusive: that works to support local community needs. Provide opportunities to all for active participation in economic and community life
8. Well-Managed: successfully resourcing town centres to ensure that challenges are addressed and solutions are delivered; driven by the

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	business community, partner organisations, residents and politicians (MPs and Cllrs).	
Transport – pink action box	This should also include reference to liaising with the boroughs in addition to OPDC and TfL.	Accept.
T1	Needs to ensure that the station retains access to the north of the station for Harlesden residents and not just serve the new Old Oak OA. Needs to include improved accessibility for pedestrians, cyclists and buses both to the station and within i.e. step free access and services that serve it.	Agreed. Priority for Harlesden is improved access from the north.
T2	Viability of inclusion of both open space, plus underground car park – to what extent will this undermine anything happening on this site when added to the other asks from the Plan?	Not sure what the answer to this is. Can remove wording “beneath the proposed town square and/or other developments”.
T3	As part of Scrubs Lane study OPDC are seeking to introduce a cycle lane along Scrubs Lane and Harrow Road. Consider referencing link to this in policy.	Accept.
Site proposals	Is there a reason these are site proposals rather than allocations? Including as a site allocation policy rather than in supporting text would give this section greater strength. Overall they could benefit from more details that outline the community’s aspirations, e.g. urban design principles? Some have very little detail, on key frontages/access points/connections with existing routes/scale, etc. For example site allocation Salvation Army Hall in the justification outlines the benefits of bringing forward the site but does not include them as a policy requirement, e.g. ‘it will also enhance the townscape along Manor Park Road’. In all cases it would be useful to provide an indicative housing development capacity based on the London Plan matrix.	Not sure what this is getting at but we can call them allocations. The ‘Site Proposals’ part is policy.  Don’t want to be too prescriptive.  Accept. Can do this
9.5	Worth mentioning Leegate shopping centre as an example of where this has been achieved- <a href="http://www.leegate-regeneration.co.uk/our-vision.htm">http://www.leegate-regeneration.co.uk/our-vision.htm</a> . Basement parking, LG supermarket, ground level public space and resi and shops around the perimeter.	Not familiar with this but will check if appropriate to reference it.
Bus depot & H1	Neighbourhood Plans need to confirm to strategic policy in the London Plan and therefore can’t de-designate Strategic Industrial Locations (SIL). The SIL boundary can only be amended by the OPDC through their Local Plan for this aspiration to come forward.	Accept this but the hope was that OPDC would accept that not appropriately designated as SIL. If the OPDC are not going to budge then there will be no option other than to remove this site proposal. However, the Forum can pursue the SIL designation to the examination of the Old Oak Local Plan if it wants to.

	<p>Consideration could be given to how employment-led development could help create an active frontage and intensify the use of the site.</p>	<p>How is employment-led development going to create an active frontage? There are some shops there already across part. One of the main problems is the access to the depot.</p>
<p>9.44</p>	<p>The locations of the access to the station will be determined by the Willesden Station Study and therefore to avoid conflict in moving forward the text should not be so specific. It might be better to stay within the wording of Policy T1 and reiterate that a more direct access for residents and visitors to the north (Harlesden) needs to be maintained with improved accessibility for pedestrians and cyclists. This could include an entrance sited closer to Station Road. Should also offer good connections and legibility to Willesden Junction Station from A4000 (old Oak Lane) and the Harrow Road (A404)</p>	<p>Surely locations of access to the station will be determined after liaison and consultation with the local community based on recommendations in the study. However, wording can be less prescriptive.</p>
<p>D1</p>	<p>The priorities in the Plan will influence the spending of Neighbourhood CIL, therefore should refer specifically to Neighbourhood CIL.</p> <p>Generally in agreement with these proposals. One of the objectives of the plan is to: “Improve the attractiveness of the town centre by improving its vitality and viability”, particularly in response to concerns raised in 3.1 about the balance/ range of shops and services, but the plan doesn’t seem to have prioritised CIL for that – even though it could be spent on town centre improvement projects. Unless this is covered via gateways 6.18/6.19 but assumed Town centre improvements are more than gateways. Policy LE2/7.22 could be covered. Also have the forum thought about how they could use CIL money to improve the connection between the existing and proposed Town Centre and the OPDC area?</p> <p>Also worth noting that some of your priorities could be delivered as part of development schemes (where they are directly relate to that development), rather than through CIL. For example where a scheme involves the redevelopment of a community facility, new community space could be secured on site as part of the development.</p>	<p>Accept.</p> <p>Accept.</p> <p>This is certainly a priority but the expectation is that this will be covered by GLA, OPDC and Brent.</p> <p>Accept but some priorities are already covered in Site Proposals, e.g. community facility / town square at Harlesden Plaza.</p>

## Appendix B

### OPDC Comments

General	Comment	There are missing sources for some of the statistics cited in the document. It would be useful to see these so information can be understood/shared by other organisations and it can help to demonstrate the robustness of the Plan	Accept.	
General	Comment	The evidence base underpinning the Plan should be published. This is required to help demonstrate the robustness of the Plan and also so that is clear that the policies/proposals are responsive to issues arising from this work.	Accept.	
General	Comment	Please note that OPDC Local Plan is only at a draft stage and is likely to be updated following the consultation, so references to this will also need to be updated accordingly. The Neighbourhood Plan should explain that the 'latest version of OPDC's Local Plan' should be referred to.	Noted.	
General	Suggestion	Maps showing proposals would be useful so that the intended implementation/application of the policy is clear.	Accept.	
Relevant Plans and Planning Policy Documents	Suggestion	This sub section could be made more concise and specific London Plan/borough policies which are relevant to neighbourhood plan proposals could be highlighted in the chapters which follow.		
Relevant Plans and Planning Policy Documents	Suggestion	It would be useful to explain the relationship between the Local Plan and Neighbourhood Plan.	Accept.	
Relevant Plans and Planning Policy Documents, paragraphs 2.19-2.20	Propose amended wording	OLD OAK AND PARK ROYAL DEVELOPMENT CORPORATION 2.19. Since 1st April 2015 the Local Planning Authority for the southern part of the NP area, around Willesden Junction station and the bus depot, has been the Old Oak and Park Royal Mayoral Development Corporation (OPDC). OPDC now determines planning applications within its area, which covers the whole of Park Royal as	Accept.	

		<p>well as Old Oak, and is now the Local Plan making authority for this area. OPDC's intention is to adopt a Local Plan for the area <b>by late 2017</b>, plan preparation has already commenced and a draft Plan is scheduled for public consultation during February and March 2016.</p> <p>2.20. In the meantime the <b>OPDC Mayor of London</b> has produced a Planning Framework for the Old Oak and Park Royal Opportunity Area which was published 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).</p>		
Vision and Objectives	Comment	<p>Whilst the objectives have positive aims, specific proposals put forward later in the Plan could potentially conflict with these i.e. support for de-designation of SIL and re-location of bus depot and objectives to protect existing jobs and improve public transport access.</p>	Don't agree.	
Housing, Policy H1	Objection	<p>Identifying and prioritising the Metroline Bus Depot site for residential use is not consistent with its designation as a Strategic Industrial Location (SIL). SIL land should be retained and used for those activities defined as suitable in London Plan policy 2.17, the extant Brent Core Strategy 2010 or the first draft OPDC Local Plan 2016.</p> <p>OPDC considers that the de-designation of SIL is a strategic policy matter that should be addressed within strategic policies in local authority Local Plans. OPDC therefore objects to this matter being dealt with in the draft NP.</p> <p>Further clarity on why the de-designation is being sought would be helpful. Is it to create active frontages or aid the delivery of housing? This will enable further consideration to be given to delivering the policy's aims within a SIL Context.</p> <p>OPDC supports the concerns raised by TfL regarding the impact on bus operations if the depot were to be relocated.</p> <p>A potential way forward would be to explore the retention of the bus depot while delivering a more intensive light industrial development with a good street</p>	<p>Accept that it is a Strategic matter. It was hoped that the Park Royal and Old Oak Local Plan would have progressed further and that the SIL designation would have been reviewed. If OPDC are not prepared to move on this then the site can be taken out.</p>	

		presence. OPDC is developing the Victoria Road and Old Oak Lane Masterplan and is keen to engage with the Forum in relation to this site.		
Housing Policy, H1	Comment	OPDC supports the principle of residential use as part of the future redevelopment of the station, but the Plan should be clear that the balance of priorities also include the need to deliver an enhanced station (capacity and access) <b>and other uses</b> .	Accept.	
Housing, paragraph 4.25	Propose amended wording	OPDC policy on density <b>will be set out in the Local Plan with high density development that responds to the surrounding content envisaged at Willesden Junction Station</b> in the emerging Local Plan. <b>This proposes that high density development will be delivered to the south of Willesden Junction station.</b>	Accept.	
Housing, Policy H2	Objection	The proposed density is not consistent with the approach to density in OPDC's Draft Local Plan and OPDC consider that this may not be consistent with the London Plan. This requires sites to optimise the delivery of housing and in the particular circumstances of Old Oak, whether sufficient account has been taken of the improved PTAL.	<b>Need to check</b>	
Housing, Policy H3	Objection	The Plan promotes one and two bed units in particular but Brent and OPDC SHMA evidence indicates a mix is required including provision for family housing. It is not clear from the summary of the Harlesden Housing Needs Assessment as to what this departure is based on. According to the Census, Harlesden is the 7th most overcrowded ward in Brent and has the second highest number of lone parents with dependent children. This suggests that there is a need for family accommodation.	Unfortunately there seems to be conflicting evidence on this. I have to say though that I don't think the HNA done on our behalf by AECOM has done us any favours. I think we're going to have to concede on this and go with Brent's policy which is 75% 1 and 2 bed units.	
Housing	Objection	Data on homelessness, placements into TA, household incomes and house prices and house prices to income ratios are out of date – suggest use of more recent data for these measures.	It would be useful if they told us where to get them.	
Housing	Comment	Further information should be provided to explain why there has been a 50% increase in population and why the	It would be useful if they told us where to get this further information.	

		population is going to be more stable over the coming years.		
Housing, paragraph 4.11	Objection	It is not clear whether intermediate products e.g.: shared ownership or rent to buy or sub-market rent cannot help meet a housing need in Harlesden. OPDC questions whether the plan can make these distinctions as these tenures are considered to all be forms of affordable housing.	This is a summary of Brent's SHMA. It is merely a statement of fact. There is no distinction in terms of policy in the Plan.	
Housing, paragraph 4.13	Comment	As per comments on Policy H3, the policy could significantly under provide family units. Further evidence should be provided to support this policy.	As above recommend that Policy H3 be amended. However, it should be noted that this paragraph is a reference to Brent's current policy.	
Housing, paragraph 4.22 (statement of intent)	Objection	The plan should not specify that additional homes provided by OPDC will be available for households in housing need in Harlesden. This will be determined through further discussions regarding housing allocations with stakeholders including Brent Council and any approach to nomination rights within the OPDC area would have to be approved by OPDC Board.	This is a misrepresentation of what is actually said. It doesn't specify anything. It says that the Forum will "seek to ensure". Wording can be toned down to say "the Forum will liaise with Brent and the OPDC to try to ensure...".	
Housing, paragraph 4.32	Comment	This should consider reflecting the new Mayor's position on 50% AH target	It would be useful if they told us what the new position is.	
Housing, paragraph 4.35	Objection	Paragraph 4.35 is inconsistent with paragraph 1.2	In what way? It would have been useful if they had elucidated on this. 1.2 is a map!	
Housing, paragraph 4.38	Comment	Please note that the Housing and Planning Bill has been enacted.	Noted.	
Community facilities, CF1	Objection	Implementation mechanism is currently unclear. Has a site been allocated? If not should the proposal seek to include this? Or will CIL be utilised?	May need to change wording. At the moment policy is trying to cover all options but perhaps would be better if it said. "Community space is sought on the Harlesden Plaza site and will be	

			delivered by s106 agreement and Neighbourhood CIL funding.	
Environment and Open Space, para 6.3	Comment	This should sign post to London Plan open space categories	Accept it should explain open space measures of deficiency against London Plan categories as well as in terms of Fields in Trust standards. The map shows deficiency of local open space in terms of London Plan categories.	
Environment and Open Space, para 6.19	Objection	See comments for Policy H1 above	Even it is accepted that the bus depot stays as designated SIL, the fact remains that the gateway is unwelcoming for the reasons set out in the paragraph. The 'ideal solution' referred to is a valid one.	
Environment and Open Space, Policy E9	Propose amended wording	Tall buildings will be acceptable at Willesden Junction station <del>subject to their</del> where it can be demonstrated that they will not have an unacceptable harmful impact on their surroundings including the residential neighbourhoods to the north of the rail tracks. Taller elements may also be acceptable on any development of the town centre car park site subject to their impact on surrounding areas and, in particular, on the conservation area and on local character.	Accept.	
Environment and Open Space, para 7.8	Objection	See comments for Policy H1 above	Once again this is an important issue identified by the Forum, and the Forum's position on this is reasonably set out. The OPDC must accept that the bus depot has an environmental impact given that their own consultants describe the site as having a high	

			environmental impact. Wording at end of final sentence could be amended to say 'in its current form' rather than 'as part of the SIL'.	
Local Economy, para 7.20 (statement of intent)	Comment	Is this meant to read Harrow Road rather than Scrubs Lane?	No.	
Local Economy, policy LE3	Propose amended wording	The development of new floorspace for retail or other town centre uses in or on the edge of Harlesden town centre <b>and connecting into Old Oak High Street town centre</b> will be supported providing it does not conflict with policies in <b>Brent's relevant</b> Local Plan...	Accept.	
Transport, Policy T1	Propose amended wording	Development at Willesden Junction station should include improvements to <b>and/or new</b> pedestrian access both from Station Road and from Harrow Road.	Accept.	
Transport, Policy T3 & T4	Comment	Both of these policies include priorities for the link between Willesden Junction along Station Road to the High Street, so there is a potential to consolidate them and clarify the links between these dual priorities for this area.	Prefer to keep them as separate policies, particularly as the policy for cycle provision includes a priority for provision of cycle parking in the town centre.	
Site Proposals, (Bus Depot, Harley Road) page 48-49	Objection	This proposal could potentially conflict with the overall objectives set earlier in the Plan i.e. support for de-designation of SIL and re-location of bus depot and objectives to protect existing jobs and improve public transport access. Identifying and prioritising the Metroliner Bus Depot site for residential use is not consistent with its designation as a Strategic Industrial Location (SIL). SIL land should be retained and used for those activities defined as suitable in London Plan policy 2.17.	Don't accept that there is any conflict with public transport access. If anything the depot's location impedes pedestrian access from Harlesden to Willesden Junction station. Also there could be no development without adequate re-provision of the bus depot nearby which would also protect jobs. For example, the old freightliner terminal site on the opposite side of the railway tracks will be	

			<p>available once HS2 have completed the new rail link at Old Oak.</p> <p>However it is probably best to accept that the site proposal is removed at this stage if OPDC are unwilling to de-designate it as SIL.</p>	
Site Proposals, (Willesden Junction Station), para 9.44	Propose amended wording	Land use proposals above the station are considered to repeat guidance stated in the OPDC Local Plan. As such this isn't considered necessary to be included. The suggestions for a new direct entrance from Station Road on the north side of the tracks is considered to be premature given the forthcoming OPDC Willesden Station Study and OPDC Public Realm and Connectivity Strategy. OPDC will be engaging with the Forum to provide	<p>I think it is useful for completeness that relevant policy for this site is repeated, as long as it is made clear that this is from the Old Oak and PR Local Plan.</p> <p>Accepted that the study will make recommendations on access but it remains an aspiration of Harlesden community that there should be good access for Harlesden and that the station isn't just focussed on serving Old Oak. Perhaps tone down wording to ensuring good access for Harlesden.</p>	
Site Proposals, (Willesden Junction Station), para 9.45	Propose amended wording	Any tall buildings should not <b>have an unacceptable harmful impact adversely upon <del>Tubbs Road</del> their surroundings.</b>	Accept.	
Policy LE1	Query	Is there an intention for businesses to relocate within the Neighbourhood Plan area.	Not necessarily. Policy likely to be amended in light of comments from Brent.	
Box following 7.13	Comment	While the OPDC would welcome engagement with the Forum in regards to providing the people of Harlesden the opportunity to improve their skills, training and qualifications and access jobs on the OPDC it would be	Accept?	

		very difficult 'to ensure' that residents from Harlesden are provided with these opportunities. Suggest softening the wording to ....agencies to assist people from Harlesden in being given opportunities....		
References to CIL throughout the document especially Policy D1	Comment/Objection	References to the spend of the Community Infrastructure Levy (CIL) throughout the document should refer to the Neighbourhood or Local Portion of CIL. The OPDC cannot in any way guarantee that CIL funding beyond that which the Neighbourhood Forum can expect from the Neighbourhood Portion of CIL will be spent in the Neighbourhood Plan area.	Accept.	