



HARLESDEN NEIGHBOURHOOD PLAN

2018 - 2033

Accompanying Document: Basic Conditions Statement

The Neighbourhood Planning (General) Regulations 2012

Part 5, Regulation 15

CONTENTS

Section	Chapter Title	Page
1.	INTRODUCTION Context Legal Requirements	1
2.	NATIONAL POLICIES AND GUIDANCE Introduction NPPF	4
3.	CONTRIBUTION TO SUSTAINABLE DEVELOPMENT	10
4.	GENERAL CONFORMITY WITH THE STRATEGIC POLICIES OF THE DEVELOPMENT PLAN FOR THE AREA Introduction The London Plan The Local Plans Conclusions	13
5.	EU Obligations	19
	APPENDIX A: BRENT COUNCIL AREA DESIGNATION AND FORUM DECISION	20
	APPENDIX B: BRENT COUNCIL SEA SCREENING OPINION	24
	APPENDIX C: Harlesden Neighbourhood Forum Boundary map	35

1. INTRODUCTION

Context

- 1.1. The Harlesden community established a Neighbourhood Forum to produce a Neighbourhood Plan. The intention of the Plan is to address some of the key planning issues in the area and to meet local challenges, and to take advantage of the opportunities presented by the major regeneration proposed for Old Oak Common and Park Royal ('Old Oak') on Harlesden's doorstep.
- 1.2. The Neighbourhood Area is primarily within Brent but also part of the area is within the boroughs of Hammersmith & Fulham and Ealing for which the Old Oak and Park Royal Development Corporation (OPDC) is the planning authority. On 28 September 2015, the designation of Harlesden Neighbourhood Forum and Neighbourhood Area, for the part of the area for which Brent Council is the local planning authority, was approved by Brent Council. The OPDC subsequently designated the Forum and Area on land within the OPDC Area on 26 November 2015.
- 1.3. This Basic Conditions Statement has been prepared by Harlesden Neighbourhood Forum in support of the Harlesden Neighbourhood Development Plan.

Legal Requirements

- 1.4. Part 5, Regulation 15 of the Neighbourhood Planning (General) Regulations states that where a qualifying body (i.e.: the Harlesden Neighbourhood Forum) submits a plan proposal to the local planning authority (i.e.: Brent Council), it must include a statement explaining how the proposed neighbourhood plan meets the requirements of paragraph of Schedule 4B of the 1990 Act.
- 1.5. Paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended) relates to the requirements for independent examination. It states that for the purpose of inspecting Neighbourhood Development Plans (recorded as amended by 38C (5)):

8. (1) The examiner must consider the following —

(a) whether the draft neighbourhood development plan meets the basic conditions (see sub-paragraph (2)),

(b) whether the draft neighbourhood development plan complies with the provisions made by or under sections 38A and 38B,

(d) whether the area for any referendum should extend beyond the neighbourhood area to which the draft neighbourhood development plan relates, and

(e) such other matters as may be prescribed.

(2) A draft neighbourhood development plan meets the basic conditions if—

(a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood development plan,

(d) the making of the neighbourhood development plan contributes to the achievement of sustainable development

(6) The examiner is not to consider any matter that does not fall within subparagraph (1) (apart from considering whether the draft neighbourhood development plan is compatible with the Convention rights).

Requirement Neighbourhood Plan	Response
1 (a) whether the draft neighbourhood development plan meets the basic conditions [as set out in sub-paragraph 2]	Chapters 2 – 5 of this document demonstrate how the basic conditions set out in subparagraph 2 (see above) have been met.
1(b) whether the draft neighbourhood development plan complies with the provisions made by or under sections 38A and 38B	The Neighbourhood Plan meets the provisions made under sections 38A and 38B as follows (responses set out in red text):
<p>38A</p> <p>(1) Any qualifying body is entitled to initiate a process for the purpose of requiring a local planning authority in England to make a neighbourhood development plan.</p>	<p>The Neighbourhood Plan meets the provisions made under sections 38A and 38B as follows (responses set out in red text):</p> <p>38A</p> <p><i>(1) Any qualifying body is entitled to initiate a process for the purpose of requiring a local planning authority in England to make a neighbourhood development plan.</i></p> <p>Harlesden was awarded Neighbourhood Forum status in December 2012 and is therefore entitled to make a Neighbourhood Plan.</p> <p><i>(2) A “neighbourhood development plan” is a plan which sets out policies (however expressed) in relation to the development and use of land in the whole or any part of a particular neighbourhood area specified in the plan.</i></p> <p>The Harlesden Neighbourhood Plan establishes policies in relation to development and land use within the designated Neighbourhood Area.</p> <p><i>(3) Schedule 4B to the principal Act, which makes provision about the process for the making of neighbourhood development orders, including—</i></p> <p><i>a) provision for independent examination of orders proposed by qualifying bodies, and</i></p> <p><i>b) provision for the holding of referendums on orders proposed by those bodies,</i></p> <p><i>- is to apply in relation to neighbourhood development plans (subject to the modifications set out in section 38C(5) of this Act).</i></p> <p>Prior to the Plan being made, the Neighbourhood Plan will be subject to an independent examination and referendum.</p> <p>Sub-paragraphs 4 to 11 relate to the requirements following the examination and referendum, and will be complied with at the appropriate time. The Neighbourhood Plan is currently at draft final stage for formal consultation by Brent Council/OPDC prior to being submitted for examination purposes.</p>

	<p>38B</p> <p><i>(1) A neighbourhood development plan— .</i> <i>(a) must specify the period for which it is to have effect, .</i> <i>(b) may not include provision about development that is excluded development, and</i> <i>(c) may not relate to more than one neighbourhood area.</i></p> <p>The Neighbourhood Plan states that the document establishes policies for the area up to 2033. Harlesden Neighbourhood Area was designated by Brent Council in September 2015 and by the OPDC in November 2015.</p> <p><i>(2) Only one neighbourhood development plan may be made for each neighbourhood area.</i></p> <p>Only one Neighbourhood Plan has been prepared for Harlesden.</p> <p><i>(3) If to any extent a policy set out in a neighbourhood development plan conflicts with any other statement or information in the plan, the conflict must be resolved in favour of the policy.</i></p> <p>The Neighbourhood Plan has been drafted to be clear and consistent. However, if there is any perceived conflict between the main body text of the document and the policies, it is agreed the conflict must be resolved in favour of the policy.</p> <p><i>(4) Regulations made by the Secretary of State may make provision— .</i> <i>(a) restricting the provision that may be included in neighbourhood development plans about the use of land, .</i> <i>(b) requiring neighbourhood development plans to include such matters as are prescribed in the regulations, and .</i> <i>(c) prescribing the form of neighbourhood development plans.</i></p> <p>Relevant Regulations made by the Secretary of State have informed the preparation of the Neighbourhood Plan.</p> <p><i>(5) A local planning authority must publish each neighbourhood development plan that they make in such manner as may be prescribed by regulations made by the Secretary of State.</i></p> <p>The Neighbourhood Plan will be formally published by Brent Council / the OPDC in line with the regulations.</p>
1(d) whether the area for any referendum should extend beyond the neighbourhood area to which the draft neighbourhood development plan relates	<p>The referendum will cover the designated Neighbourhood Area. The policies and objectives of the Harlesden Neighbourhood Plan will result in local benefits but are unlikely to have any wider impacts. Therefore, once the referendum stage is reached, it is not considered necessary to extend the referendum area.</p>
1(e) such other matters as may be prescribed	<p>There are no other prescribed matters.</p>

2. NATIONAL POLICIES AND GUIDANCE

Introduction

- 2.1. National planning policy is established in the National Planning Policy Framework (NPPF) (2012) and supplementary guidance is set out in Planning Practice Guidance published by the Department for Communities and Local Government (DCLG).

NPPF

- 2.2. The NPPF outlines the purpose of neighbourhood planning as to *“give communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need”* (Para. 183).
- 2.3. The NPPF establishes the framework for developing local and neighbourhood plans. As the principles of the NPPF are based on *“a presumption in favour of sustainable development”* (Para. 14) it is stated that *“the application of the presumption will have implications for how communities engage in neighbourhood planning. Critically it will mean that neighbourhoods should:*
- *develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;*
 - *plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan; and*
 - *identify opportunities to use Neighbourhood Development Orders to enable developments that are consistent with their neighbourhood plan to proceed”* (Para. 16).
- 2.4. In line with the objectives of the NPPF, the Harlesden Neighbourhood Plan provides positive planning guidance for the area. The policies have been informed by the guidance set out in the NPPF, with the following topics being the most relevant:
- Building a strong, competitive economy
 - Ensuring the vitality of town centres;
 - Promoting sustainable transport;
 - Delivering a wide choice of high quality homes;
 - Requiring good design;
 - Promoting healthy communities
 - Meeting the challenge of climate change, flooding and coastal change
 - Conserving and enhancing the natural environment
 - Conserving and enhancing the historic environment

Building a strong, competitive economy

- 2.5. The NPPF states in paragraph 21 that *‘Planning should operate to encourage and not act as an impediment to sustainable growth... Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing. In drawing up Local Plans, local planning authorities should:*
- *identify strategic sites ... to meet anticipated needs over the plan period;*
 - *support existing business sectors;*
 - *identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and*
 - *facilitate flexible working practices such as the integration of residential and commercial uses in the same unit.*

- 2.6. Opportunities for the provision of new employment within the Neighbourhood Area are mainly limited to new development of shops and other town centre uses. Consequently, the redevelopment of the town centre site at Harlesden Plaza (Site Allocation 1) is seen as key to future prosperity in and around the town centre, as is ensuring good linkages to the major new regeneration area at Old Oak so that new visitors and customers can be attracted to the centre.

Ensuring the vitality of town centres

- 2.7. The NPPF requires policies relating to town centres to *“be positive [and] promote competitive town centre environments”* and goes on to state that plans should:
- *“recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;*
 - *promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;*
 - *recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites; and*
 - *where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity”* (Para. 23).
- 2.8. One of the key objectives of the Harlesden Neighbourhood Plan is to improve the attractiveness of Harlesden town centre by improving its vitality and viability. The Plan recognises that the vitality of the town centre is linked with the social as well as economic well-being of the area and that the town centre is the heart of the community.
- 2.9. In order to support and enhance the vitality and viability of the town centre, Policy LE3 supports the development of new floorspace for retail or other town centre uses within Harlesden town centre, and connecting into Old Oak High Street town centre.
- 2.10. To make the town centre more attractive and encourage economic activity, Policy LE2 promotes improvements to shop fronts on the High Street. Policy seeks to improve the visual quality of the High Street which will make it more likely to attract visitors to the centre and, as a result, attract further businesses.
- 2.11. Policy E5 proposes the introduction of a town square surrounded by mixed town centre uses at Harlesden Plaza – promoting the redevelopment of the Plaza from an ordinary car park into a vibrant urban space.

Promoting sustainable transport

- 2.12. The NPPF states that *“plans should protect and exploit opportunities for the use of sustainable transport modes”* (Para 35). It goes on to state that *“planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure and other activities”* (Para. 37).
- 2.13. The NPPF defines sustainable transport modes as *“any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low emission vehicles, car sharing and public transport”* (p.57).
- 2.14. An Objective of the Neighbourhood Plan is to improve transport access for residents and visitors whilst minimising the impact of traffic on the town centre and the residential environment. The Plan recognises that careful attention needs to be given to the best balance between the need for car access and the needs of other users of streets. The Plan makes it clear that in identifying

priorities for improvements, the focus should be on public transport, cycling and walking rather than the private car.

- 2.15. In particular, the Neighbourhood Plan expresses support for the draft OPDC Local Plan proposals for major improvements to Willesden Junction station and considers it vital that not only should access be improved for Harlesden residents and visitors, but that there must also be good links between the new development at Old Oak and Harlesden town centre. Policy T1 seeks improvements to pedestrian and cycle access on development of the station.
- 2.16. The Neighbourhood Plan does not include any policies on local car parking standards. It is considered that the standards established in higher level Plans are appropriate for the area. However, given the emphasis in the Plan on sustainable modes of transport, Policy T2 does state that only 60 parking spaces out of over 100 existing need be retained on development of the Harlesden Plaza town centre car park.
- 2.17. Policy T3 deals with the priority locations for a new cycle route and cycle parking facilities.
- 2.18. Policy T4 deals with priorities for improvements to the pedestrian environment.

Delivering a wide choice of high quality homes

- 2.19. The NPPF sets out requirements in paragraph 47 for local planning authorities to significantly boost the supply of housing. This includes:
 - *identifying a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15. To be considered developable, sites should be in a location suitable for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged; and*
 - *setting out the local authority's own approach to housing density to reflect local circumstances.*
- 2.20. A key priority of the Neighbourhood Plan is to ensure that there are sufficient homes, particularly affordable homes, to meet local needs. Two objectives in the Plan relate to the provision of new housing:
 - Deliver an increase in the number of new affordable homes, including those for rent and for first time buyers; and
 - Reduce homelessness locally
- 2.21. To deliver on the objectives the Forum intend to liaise with the OPDC to try to secure a proportion of the affordable homes delivered at Old Oak for those in need in the Harlesden area.
- 2.22. Policy H1 lists sites where housing should be part of the development mix if they are brought forward for development.
- 2.23. Policy H2 seeks densities for new housing development at the upper end of the range set out as being appropriate in the London Plan.
- 2.24. An intention is expressed for the Forum to investigate, with key community stakeholders, whether there is potential for setting up a community land trust to help deliver more affordable homes.

Requiring good design

- 2.25. The NPPF notes that *“good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people”* (Para. 56). It states that *“it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes”* (Para. 57).
- 2.26. The NPPF requires neighbourhood plans to *“develop robust and comprehensive policies that set out the quality of development that will be expected for the area”* (Para. 58). It goes on to state that *“planning policies and decisions should aim to ensure that developments:*
- *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - *establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit; ...*
 - *create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and are visually attractive as a result of good architecture and appropriate landscaping”* (Para. 58).
- 2.27. The NPPF also recognises that *“although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies... should address the connections between people and places and the integration of new development into the natural, built and historic environment”* (Para. 61).
- 2.28. The Neighbourhood Plan highlights the need to protect Harlesden’s existing character and, accordingly, policy has developed with the aim of reflecting that character and preventing development that may impact upon it. There is also an aim to make the town centre attractive to visitors, therefore policy also focuses on gateways to the town centre.
- 2.29. Policy LE2 deals with improving shopfront design whilst policy E9 deals with tall buildings including the appropriate location for them.
- 2.30. Policy E6 requires development at gateways to add to the sense of arrival and states that the quality of development will be given significant weight when determining planning applications at gateways, and on major routes to the town centre from them. CIL funds will be directed to the public realm in these locations.
- 2.31. Policy E7 promotes the provision of public art on the development of key, large sites in the town centre.
- 2.32. Site Allocation 1 includes more detailed policy / design guidance so that the development of Harlesden Plaza will reflect the existing character of Harlesden’s buildings.

Promoting healthy communities

- 2.33. The NPPF recognises that *“the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities”* (Para. 69). It states that planning policies should *“plan positively for the provision and use of shared space, community facilities... and other local services”* (Para. 70).

- 2.34. The NPPF states that: *‘Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.’* It goes on to state: *‘Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision.... Information gained from the assessments should be used to determine what open space, sports and recreational provision is required’* (Para. 73). It also notes the importance of protecting existing open space and sports and recreational facilities stating that they should not be developed unless:
- *“an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
 - *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
 - *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss”* (Para. 74).
- 2.35. Objectives of the Neighbourhood Plan include to protect and improve existing community facilities and, specifically, to provide a new community hub which can act as a focal point for the area. The Neighbourhood Plan also aims to increase the amount of open space locally and improve the street environment.
- 2.36. A clear need for additional community space has been identified for Harlesden so policy CF1 and Site Allocation 1 are seeking community space as part of the development of the Harlesden Plaza site. Additionally, an intention to nominate Challenge House as a Community Asset so that in future it may be possible for the community to acquire it. It is also considered that certain local public houses provide a valuable community function so policy CF2 seeks the listing of 4 premises as community assets.
- 2.37. In recognition of a major deficiency in public open space across most of the Plan area, policy E1 seeks the provision of new space on the development of larger sites in the area of open space deficiency.
- 2.38. In order to provide a new ‘heart’ for the Harlesden community, policy E5 and Site Allocation1 seek the provision of a new town square on development of the Harlesden Plaza site.

Meeting the challenge of climate change, flooding and coastal change

- 2.39. The NPPF sets out in paragraph 95 that, to support the move to a low carbon future, local planning authorities should:
- *‘plan for new development in locations and ways which reduce greenhouse gas emissions;*
 - *actively support energy efficiency improvements to existing buildings; and*
 - *when setting any local requirement for a building’s sustainability, do so in a way consistent with the Government’s zero carbon buildings policy and adopt nationally described standards.’*
- 2.40. Policies on the need for development to be sustainable, and thus supporting the move to a low carbon future, are set out in detail in the London Plan and the relevant Local Plans. Apart from proposing major trip generating development in the town centre where access by modes other than the car is good, promoting sustainable modes of travel and a policy (E2) encouraging the provision of space for food growing on major housing schemes, the Neighbourhood Plan defers to policy in these plans.

Conserving and enhancing the natural environment

- 2.41. The NPPF states in paragraph 109 that the planning system should contribute to and enhance the natural and local environment by a range of means, including:
- *‘protecting and enhancing valued landscapes, geological conservation interests and soils;*
 - *recognising the wider benefits of ecosystem services; and*
 - *minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.’*
- 2.42. In allocating sites, the Neighbourhood Plan has balanced the need to protect and enhance the natural environment with other policy considerations such as access to sustainable transport. It also includes policy (E1) seeking the provision of new public open space on the development of larger sites in open space deficiency areas.
- 2.43. Policy E8 requires appropriate mitigation for the loss of trees on development as well as prioritising Neighbourhood CIL funds on the planting of new street trees.

Conserving and enhancing the historic environment

- 2.44. The NPPF sets out in paragraph 126 that: *‘Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment..... In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:*
- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
 - *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
 - *the desirability of new development making a positive contribution to local character and distinctiveness; and*
 - *opportunities to draw on the contribution made by the historic environment to the character of a place.’*
- 2.45. The Harlesden community, through the Forum, has decided that it is important that the character of Harlesden should be preserved. Consequently, one of the objectives for the Plan is that the buildings / structures that contribute to the area’s character should be protected. To this end policy E1 identifies certain buildings / features as Non-designated heritage assets that should be subject to relevant London Plan and Brent Local Plan policy. In addition, Site Allocation 1 includes policy and guidance so that development should reflect local character.

3. CONTRIBUTION TO THE ACHIEVEMENT OF SUSTAINABLE DEVELOPMENT

- 3.1. The NPPF states that sustainable development “*should be seen as a golden thread running through both plan-making and decision taking*”.
- 3.2. A Sustainability Appraisal has not been deemed necessary for the Harlesden Neighbourhood Plan. However, Brent Council has established a set of sustainability objectives which are used to appraise policy documents and it is considered appropriate that these are used to assess the Neighbourhood Plan’s policies against. The table below demonstrates how the Harlesden Neighbourhood Plan will meet these objectives.

Sustainability Objective	Commentary on the Neighbourhood Plan
Prosperity and Social Inclusion S1. To reduce poverty and social exclusion	The Neighbourhood Plan seeks to improve the vitality of the town centre which will result in improvements to local economic activity and potentially increasing local employment.
Health and Wellbeing S2. To improve the health and wellbeing of the population	There are no policies in the NP relating directly to health facilities as these are considered to be sufficiently dealt with in the London Plan and the Local Plans. Policy E1 does deal with the provision of additional public open space and policy E3 promotes the implementation of safer streets schemes, including areas for children’s play. Both policies will help promote healthier lifestyles.
Education and Skills S3. To improve the education and skills of the population	Although the Plan does not need to include policy for schools, which are dealt with in the London Plan and Local Plans, it does state that 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.
Housing S4. To provide everybody with the opportunity to live in a decent home	Meeting housing need locally and reducing homelessness, particularly through the provision of new homes, is a key priority of the Plan. Sites have been allocated for housing development.
Crime Prevention and & Community Safety S5. To reduce crime and anti-social activity	The primary policies regarding community safety are in the London Plan and the Local Plans. The Neighbourhood Plan includes in chapter 11 more detailed guidance for the development of Harlesden Plaza. The public square is to be designed taking into account the safety and comfort of users of all ages and this should include natural surveillance and good legibility. Access points in particular should be animated, and prioritise safety (particularly at roads) and visibility.

Community Identity S6. To encourage a sense of community; identity and welfare	The Neighbourhood Plan seeks to maintain the distinctive Harlesden character through public realm and shop front improvements and for new development to reflect existing character. The new town square is proposed as a 'heart' for Harlesden where people can meet or congregate.
Accessibility S7. To improve accessibility to key services especially for those most in need	As noted for school provision referred to under Education & Skills above, planning for health facilities is dealt with in the London Plan and Local Plans. The Neighbourhood Plan does make provision for an increase in community space locally. Regeneration of the town centre, to include shops and other services, and where access is good, is promoted.
Traffic EN1. To reduce the effect of traffic on the environment	Sustainable modes of transport are promoted allied with a reduction in the number of public car parking spaces in the town centre to encourage use of alternative modes. The Plan also seeks to improve the pedestrian environment, particularly along Station Road.
Water Quality & Resources EN2. To improve water quality; conserve water resources and provide for sustainable sources of water supply	This is primarily a matter for the London Plan and the Local Plans, although the Neighbourhood Plan does highlight the concerns of Thames Water relating to the capacity of the water supply network and foul water system on development for certain site allocations.
Air Quality EN3. To improve air quality	Policy E8 prioritises the planting of new street trees for CIL spending, which can help reduce air pollution. The Plan also promotes sustainable modes of transport as well as proposing a reduction in the number of public car parking spaces in the town centre to encourage use of alternative modes, which should help to minimise air pollution from traffic.
Biodiversity EN4. To conserve and enhance biodiversity	Policy E8 prioritising the provision of new street trees will enhance biodiversity.
Landscape & Townscape EN5. To maintain and enhance the character and quality of landscapes and townscapes	Policies E4 to E 8, on heritage, a new town square, gateway enhancement, the provision of public art and tree planting together with policy LE2 on shop front improvement, contribute towards the maintenance and enhancement of the character and quality of landscapes and townscapes.
Historic Environment & Cultural Assets EN6. To conserve and, where appropriate, enhance the historic environment and cultural assets	Policy E4 identifying non-designated heritage assets and Site Allocation 1 providing detailed guidance so that new development reflects existing character.

Climate Change EN7. To reduce contributions to climate change and reduce vulnerability to climate change	The London Plan and Local Plans have a raft of policy, for example dealing with the design of new buildings, which seek to reduce contributions to climate change. These policies will be applied within the Harlesden NP area. In addition, the NP promotes sustainable modes of transport as well as proposing a reduction in the number of public car parking spaces in the town centre to encourage use of alternative modes. This will help control the emission of greenhouse gases which contribute to climate change.
Waste Management EN8. To minimise the production of waste and use of non-renewable materials	Any proposals for new development would be required to comply with the relevant Local Plan policies relating to waste management.
Land and Soil EN9. To conserve and enhance land quality and soil resources	The Neighbourhood Plan will not result in any significant impacts on land and soil quality. Any development proposals in the area would be required to comply with Local Plan policies relating to mitigating impacts and land and soil quality.
Growth EC1. To encourage sustainable economic growth	Development proposals in the NP and improvement of links to Willesden Junction and Old Oak will encourage growth in a sustainable way.
Employment EC2. To offer everybody the opportunity for rewarding and satisfying employment	Policies in the NP seek to boost the local economy, particularly through improvements and regeneration in the town centre, which should increase employment opportunities.
Regeneration EC3. To reduce disparities in economic performance and promote sustainable regeneration	The key regeneration site is the Harlesden Plaza site where proposed development will be sustainable by encouraging modes of travel other than the car. The other main site is Willesden Junction station which will promote travel by public transport.
Investment EC4. To encourage and accommodate both indigenous and inward investment	The promotion, and proposed enhancement, of links to Willesden Junction and the regeneration area at Old Oak, together with policies to regenerate and improve the town centre, are intended in part to promote investment.
Efficient Movement EC5. To encourage efficient patterns of movement in support of economic growth	The NP promotes sustainable modes of transport as well as proposing a reduction in the number of public car parking spaces in the town centre to encourage use of alternative modes.

4. GENERAL CONFORMITY WITH THE STRATEGIC POLICIES OF THE DEVELOPMENT PLAN FOR THE AREA

Introduction

- 4.1. The NPPF states that *“neighbourhood plans must be in general conformity with the strategic policies of the Local Plan”* (Para. 184).
- 4.2. The Harlesden Neighbourhood Plan has been developed in consideration of adopted and emerging London-wide and Brent planning policies, set out in:
- The London Plan 2016
 - The Draft New London Plan 2017
 - Brent Local Plan
 - Brent Core Strategy 2010
 - Brent Site Specific Allocations DPD 2011
 - Brent Development Management Policies 2016
 - West London Waste Plan 2015
 - Ealing Local Plan

The London Plan

- 4.3. The current London Plan was published in 2011 and was then subject to a series of alterations culminating in a published consolidated version in 2016. A draft new London Plan was published for public consultation in November 2017.
- 4.4. The generic policies of the London Plan, i.e. those that do not just apply to specific locations in London, will be relevant for the Harlesden area. Only those that provide a context for policies in the Neighbourhood Plan are described below.

Policy 2.6: Outer London Vision and Strategy

- 4.5. Brent falls within the area defined as Outer London in the London Plan. The vision for outer London is for the Mayor, boroughs and other stakeholders to *“work to realise the potential of outer London, recognising and building upon its great diversity and varied strengths by providing locally sensitive approaches”*. The Policy goes on to state that all relevant stakeholders should *“enhance the quality of life in outer London for present and future residents”*.
- 4.6. The Harlesden Neighbourhood Plan will make a positive contribution to this vision by improving this outer London centre and enhance quality of life by promoting improvements to the public realm, a better range of local facilities and promoting healthy and active lifestyles.

Policy 3.3: Increasing housing supply

- 4.7. The London plan requires Brent to deliver 15,253 houses in the period 2015 to 2025. The Neighbourhood Plan has the potential to make a contribution to delivering this target. Sites are formally allocated for housing development.

Policy 3.16 Protection and enhancement of social infrastructure

- 4.8. The Mayor considers that the whole range of social infrastructure has a major role to play in supporting London’s expected growth. The London Plan states that boroughs should *“provide a framework for collaborative engagement with social infrastructure providers and community organisations:*
- a) for the regular assessment of the need for social infrastructure at the local and sub-regional levels;*
 - and*
 - b) to secure sites for future provision or reorganisation of provision.*

- 4.9. The Forum considers that most of the planning for social infrastructure provision is dealt with sufficiently by the relevant Local Plans. The Neighbourhood Plan has identified a particular need locally for additional play provision and for community meeting space and, accordingly, seeks to expand provision of both.

Policy 4.8: Supporting a successful and diverse retail sector and related facilities and services

- 4.10. The London Plan supports the creation of *“a successful, competitive and diverse retail sector which promotes sustainable access to the goods and services that Londoners need”* and requires Local Plans to *“take a proactive approach to planning for retailing and related facilities and services”*. The Harlesden Neighbourhood Plan takes a proactive approach to development along the High Street by:
- Promoting the attraction of the town centre through regeneration by allocating development of new shops and open space in the form of a town square
 - Seeking public realm and shop front improvements to make the centre more attractive, particularly focussing on key gateways and ensuring good linkages to the major new development area at Old Oak;

Policies 5.1 – 5.18: Policies relating to climate change

- 4.11. Chapter 5 of the London Plan establishes a number of policies relating to how London could mitigate the impacts of climate change. These policies, combined with policies relating to sustainability and environment set out in Brent’s and the OPDC Local Plans, set the standards which any new development in the area would be required to adhere to. Within Harlesden the NP is seeking restraint on car use and alternative modes such as public transport, walking and cycling are promoted through the Plan.

Policy 6.9: Cycling

- 4.12. The Mayor seeks to significantly increase cycling across London. The Harlesden Neighbourhood Plan proposes a new cycle route along Station Road as well as new cycle parking facilities in the town centre.

Policy 7.4: Local character

- 4.13. The Mayor notes that *“in areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.”*
- 4.14. The Neighbourhood Plan seeks to maintain and enhance the historic character of Harlesden through the identification of non-designated heritage assets, improvement of shopfronts and by including specific design guidance for the development of the Harlesden Plaza site.

Policy 7.5: Public realm

- 4.15. The London Plan states that *“boroughs should develop local objectives and programmes for enhancing the public realm and ensuring it is accessible for all”*.
- 4.16. The Harlesden Neighbourhood Plan includes a number of policies promoting public realm improvements in the area.

Policy 7.18: Protecting public open spaces

- 4.17. The London Plan resists the loss of protected open spaces. Brent’s Local Plan contains policy to protect existing open space. The Neighbourhood Plan includes policy which prioritises areas for the provision of new open space, aspires to improve existing public open space at Roundwood Park and proposes the provision of new open space in the form of a new town square at Harlesden Plaza.

The Local Plans

- 4.18. There are also strategic policies within the Local Plans for the area. Nearly all of those relevant are within Brent's Local Plan which comprises a number of documents, including the Core Strategy (2010), the Site Specific Allocations Development (2011) and the Development Management Policies Document (2004). Also, relevant for part of the area (the bus depot site) is Ealing's Local Plan which, ultimately, will be superseded by the OPDC Local Plan when adopted. A very small part of the Neighbourhood Area at Willesden Junction station is within the borough of Hammersmith & Fulham. However, it is considered unnecessary to assess the Plan against this Local Plan because it would not be significant in terms of policy in the Neighbourhood Plan.
- 4.19. The strategic Local Plan policies of particular relevance to the Harlesden Neighbourhood Plan have been organised by topic area and are set out below. Core Strategy policies are prefixed by CP and Development Management policies by DMP.
- 4.20. Brent's Core Strategy sets out the spatial vision, objectives and strategic policies for development in the borough up to 2026.

Sustainable Development

- 4.21. Policy CP19 states that *"All development should contribute towards achieving sustainable development, including climate change mitigation and adaptation."*
- 4.22. The Neighbourhood Plan commits to development being sustainable and includes a policy which states that "In proposing development it should be ensured that development is sustainable".

Housing

- 4.23. **Policy CP2** identifies five growth areas where the majority of Brent's growth in new housing will be focussed. Harlesden is not one of the growth areas but is identified in supporting text as a town centre suitable for housing growth by virtue of public transport provision and local shops and services.
- 4.24. Through the Neighbourhood Plan, sites have been identified in the town centre where new housing is appropriate.
- 4.25. **Policy CP21** seeks to maintain and provide a balanced housing stock by protecting existing accommodation that meets known needs and by ensuring that new housing appropriately contributes towards the wide range of borough household needs.
- 4.26. On affordable housing, it is stated in paragraph 5.91 that London Plan policy will be applied across Brent. **Policy DMP15** deals with affordable housing and states that the maximum reasonable amount of affordable housing will be sought on individual residential and mixed use developments on sites with the capacity to provide 10 or more homes
- 4.27. The Harlesden Neighbourhood Plan will, through the identification of sites for new housing and by seeking densities at the high end of the range, make a positive contribution to meeting existing and future housing need.

Community Facilities

- 4.28. **Policy CP23** protects existing, and promotes new, community facilities.
- 4.29. The Neighbourhood Plan is seeking to provide additional community facilities in the form of a community hub.
- 4.30. **Policy DMP21** seeks to protect public houses if they constitute a service of particular value to the local community. Policy will also only allow the loss of public houses registered as an Asset of Community Value if the premises can be shown to have been offered for sale to local community groups and no credible offer has been received from such a group at a price that is reflective of the condition of the building and its future use as a public house.
- 4.31. The Neighbourhood Plan proposes the listing of four public houses as community assets and refers to the need to meet the criteria of Brent's policy DMP21 if their loss is to be permitted.

Open Space

- 4.32. **Policy CP18** on the Protection of open space, sports and biodiversity states:

"Open space... of local value will be protected from inappropriate development and will be preserved for the benefit, enjoyment, health and well-being of Brent's residents, visitors and wildlife. Support will be given to the enhancement and management of open space for recreational, sporting and amenity use and the improvement of both open space and the built environment for biodiversity and nature conservation. New or improved provision (including improved access) will be sought in areas of deficiency and where additional pressure on open space and outdoor play facilities would be created."

- 4.33. The Neighbourhood Plan demonstrates the deficiency in public open space across most of the area and includes policy to address deficiency in these areas when major development is brought forward. It also includes an aspiration to improve existing public open space. A new town square is also proposed by the Neighbourhood Plan.
- 4.34. In accordance with **Policy DMP8** the Neighbourhood Plan promotes local food growing by encouraging space to be provided on major residential development.

Heritage

- 4.35. **Policy CP 17** is concerned with protecting and enhancing the distinctive suburban character of Brent whilst **policy DMP7** includes policy for proposals which are either for or dealing with heritage assets.
- 4.36. The Neighbourhood Plan identifies additional non-designated assets to which policy DMP7 will apply as well as including detailed design policy for town centre development generally as well as specific policy for the development of Site Allocation 1, Harlesden Plaza. Development should enhance Harlesden's existing character.

Public Realm

- 4.37. Brent's **policy CP5** on place making requires development in growth and regeneration areas to have regard to a number of considerations including:
- *"The allocation of sites for a range of uses (as set out in the Site Specific Allocations DPD), with particular support for development that is mixed in use and mixed in tenure. A vertical mixing of uses is encouraged.*
 - *The creation of open space (including new squares / public meeting places)*
 - *The contribution towards the creation of a distinctive place with a positive sense of identity which is well connected and accessible. Consideration of the heritage of the area and investigate means of introducing continuity through urban design measures and the possibility of reusing and restoring buildings of merit"*
- 4.38. The Neighbourhood Plan is intended to make a significant contribution to place making through enhancement of the public realm. This includes the proposal to provide a new town square, improvements to the pedestrian environment between the town centre and the Old Oak regeneration area, street tree planting, shop front enhancements and the provision of public art. Policy on design should also enhance the character of the town centre including existing and newly identified heritage assets.

Industrial Land

- 4.39. Relevant Local Plan policy towards industrial land is contained in Brent's Core Strategy and Development Management Policies document. Also relevant is Ealing's Local Plan because the part of the Neighbourhood Area which is designated as part of a Strategic Industrial Location (SIL), i.e. the bus depot site, is within the borough of Ealing. Policy for this site will ultimately be superseded by the OPDC Local Plan when adopted.
- 4.40. Ealing policy for SIL is one of Long Term Protection as indicated in **policy 1.2 of Ealing's Core Strategy**.
- 4.41. Although the Forum considers that the bus depot site is not appropriately designated as SIL, it nevertheless recognises that it continues to be so designated and this is acknowledged by the Neighbourhood Plan.
- 4.42. Brent's Policy CP20 deals only with Strategic Industrial Locations and Locally Significant Industrial Sites. There are none of these designations within the Brent part of the Neighbourhood Area therefore this policy is not relevant. However, **policy DMP14** on Employment Sites is relevant because there are a number of Local Employment Sites within Harlesden. Policy DMP14 includes criteria by which Local Employment Sites may be released to non-employment uses. The Neighbourhood Plan has included the same criteria but with the additional requirement that it should also 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.

Town Centres

- 4.43. **Policy CP16: Town centres** states that *"the council will continue to support proposals that maintain the position of the centres in the retail hierarchy. Town centre opportunity sites will be identified within, or on the edge of, some existing town centres in Brent. These opportunity sites are likely to be outmoded premises or sites currently under-utilised with redevelopment potential to help meet Brent's future retail needs. Regeneration of these opportunity sites will be sought with the aim of revitalising the vitality and viability of the centres where they are located."*

- 4.44. A priority of the Neighbourhood Forum is to maintain and enhance Harlesden town centre in the face of competition from elsewhere, and especially from the potential threat from new town centre development at Old Oak on its doorstep. Consequently, a number of policies in the Neighbourhood Plan are to improve the town centre, such as the policy for shop front improvements, support for new floorspace for retail and other town centre uses and the extension of the centre towards Old Oak. Additionally, the site allocation at Harlesden Plaza is intended to breathe new life into the heart of Harlesden with additional floorspace and a new focal point for the community in the form of a town square.
- 4.45. Two of the site allocations relating to the town centre have been carried forward from the **Site Specific Allocations DPD** of Brent's Local Plan, site 9 the Harlesden Plaza site described above and site 11 the Manor Park Works site. Both sites have amended boundaries and policy in the Neighbourhood Plan, and will supersede the allocations in Brent's Local Plan. The two other site specific allocations in Brent's Local Plan that are within Harlesden town centre, sites 10 and 12, have been implemented since it was adopted.
- 4.46. There are also policies in Brent's **Development Management Policies** document relating to town centres, for example, **policy DMP3** controlling certain non-retail uses such as betting shops and takeaways, **policy DMP4** for neighbourhood centres and isolated shops and **policy DMP4a** on shop front design and forecourt trading.
- 4.47. The Neighbourhood Forum supports the above policies relating to town centres.

Transport and Access

- 4.48. **Policy CP5** on Placemaking highlights the need for infrastructure, including public transport, walking and cycling, to support growth. Additionally, a key objective of Brent's Local Plan is to reduce the need to travel and policy CP16 on town centres is particularly relevant as it requires a sequential approach to development for major new retail and other town centre uses.
- 4.49. Harlesden, being a District Centre in the hierarchy of centres is an appropriate centre to promote new town centre floorspace, as the Neighbourhood Plan does. Proposals also include a new cycle route, cycle parking facilities, improvements to the pedestrian environment and improved access to Willesden Junction station. All of these contribute to better sustainable transport infrastructure.

Conclusions

- 4.50. It is apparent from the above that the Neighbourhood Plan is consistent with the objectives and policies of the Development Plan and will make a positive contribution to wider strategic policy aims and objectives.

5. EU OBLIGATIONS

- 5.1. The Neighbourhood Plan does not include any policies or proposals that will result in any significant environmental impacts, and therefore a Strategic Environmental Assessment (SEA) of the plan is not necessary. Brent Council has issued an SEA Screening Opinion which confirms this (see Appendix B).
- 5.2. Although the Neighbourhood Plan does allocate 4 development sites, it is not considered that any of these would require an Environmental Impact Assessment, and so one has not been carried out. Two of these sites are carried forward from Brent's Site Specific Allocations document for which there has already been a sustainability appraisal carried out, and there are likely to be lower overall impacts from the revisions made. Another site is within the OPDC area and subject to appraisal within that document. The Neighbourhood merely sets out some local requirements for that site another is identified
- 5.3. The Neighbourhood Plan area does not include any designated important habitats or species, as identified in the Habitats and Wild Birds Directives, and so an assessment under these regulations is not necessary.
- 5.4. Other European directives, such as the Waste Framework Directive, the Air Quality Directive or the Water Directive, have also been considered in developing the Neighbourhood Plan. As no major development sites have been allocated in the Neighbourhood Plan it has not been considered necessary to provide any separate assessments under any other European Directive.
- 5.5. In summary, the Neighbourhood Plan is compliant with EU Obligations.

APPENDIX A: BRENT COUNCIL AND OPDC AREA DESIGNATION AND FORUM DECISION

 Brent	Request for Strategic Director (Regeneration & Growth) and Lead Member (Housing & Development) Agreement 28th September 2015
Wards affected: Harlesden, Kensal Green, Stonebridge, Willesden Green	
Neighbourhood Forum and Neighbourhood Plan Area – Application for Harlesden	

1.0 Summary

- 1.1 This report includes details relating to the request from the Harlesden Neighbourhood Planning Forum for Neighbourhood Area designation, and Forum status, and recommends that the Lead Member approve the designations applied for.

2.0 Recommendations

- 2.1 That the designation of Harlesden Neighbourhood Area and Neighbourhood Forum, as set out in the submitted application, be agreed for the areas of land for which Brent Council is the local planning authority.

3.0 Background

- 3.1 Neighbourhood Plans were introduced through the Localism Act 2011. The Act enables communities to develop planning policies that will become part of the planning framework for their area. It also allows them to grant planning permission for certain types of new development.
- 3.2 Neighbourhood planning is delivered by 'neighbourhood forums' for their 'neighbourhood area'. Neighbourhood forums and areas need to be agreed by local planning authorities, following local publicity.

The Applications

- 3.5 In July 2015, the Harlesden Neighbourhood Planning Forum applied to become a neighbourhood forum and to have Harlesden designated as a neighbourhood area.

The application, including a map showing the extent of the proposed neighbourhood area, is included in Appendix A of this report.

- 3.6 The proposed neighbourhood area includes land within the London Boroughs of Brent, Hammersmith & Fulham and Ealing. Part of this land, as shown in Appendix B, now falls within a Mayoral Development Area. On 1 April 2015, the Old Oak and Park Royal Development Corporation (OPDC) became the local planning authority for this land. The OPDC is therefore now responsible for determining the application for this land, rather than the boroughs.
- 3.7 The council and OPDC assessed the joint application and are satisfied that it complies with the statutory requirements as set out in the Neighbourhood Planning (General) Regulations 2012. A summary of the assessment is included as Appendix C.
- 3.8 In line with the Regulations, the council and OPDC published the applications for a six week consultation period ending on 25 August 2015. During the consultation period application documents were made available to view at Harlesden and Wembley Library, online at a dedicated website www.brent.gov.uk/hnp and on the OPDC website. The consultation was publicised via a press notice in the Brent & Kilburn Times, posters in community venues in Harlesden, and via Facebook and Twitter. The following groups were also invited to comment via email:
- All Brent Councillors
 - Members of Brent Council's Harlesden Connects Forum
 - Members of the Harlesden Neighbourhood Planning Forum
 - Relevant organisations and groups from the Local Plan consultation database, including neighbouring boroughs and community groups

Consultation Responses

- 3.8 Five responses were received to the consultation. There were no objections.
- 3.9 Councillor Filson, Ward Councillor for Kensal Green and a member of the forum, wrote in support of the joint application stating he considered the boundaries appropriate.
- 3.10 David Craine, a resident in the area and a forum member, also supported the application. He stated the objectives which the forum has identified will help ensure the body makes a positive contribution to ensuring local engagement for delivery of sustainable development in the area.
- 3.11 Ealing Council had no objection to the inclusion of a strip of land within their borough, commenting it seemed sensible if proposals are to be brought forward for environmental improvements on the approaches to Willesden Junction Station.
- 3.12 Transport for London (TfL) noted it has an interest in facilitating the neighbourhood planning process and to ensure that any local transport aspirations are achievable and compliant with the London Plan and the Mayor's Transport Strategy. TfL therefore wish to be engaged as the Plan develops.
- 3.13 Robin Smith a local resident commented on traffic issues in the Greenhill Park area. The comments did not relate to the joint application, but will be passed to the transportation team and forum for consideration.

4.0 Financial Implications

- 4.1 On designation of the neighbourhood area and forum the Council can apply for £10,000 of funding to support the preparation of a neighbourhood plan. Furthermore, on successful completion of an examination into the Plan the Council can also apply for additional £20,000 towards the cost of examination and referendum. However, the Government has made no commitment to extend this funding beyond the 2015/16 financial year. It is unlikely that an examination and referendum will occur before April 2016 and therefore there is an unfunded risk of £20,000 in 2016/17 which will need to be met from the Cash Limit of the Planning and Regeneration Service Unit.

5.0 Legal Implications

- 5.1 Once adopted a neighbourhood plan will form part of the development plan for the borough. There is a duty upon the council to provide support and advice to communities wishing to bring forward a neighbourhood plan under the Neighbourhood Planning (General) Regulations 2012.

6.0 Diversity Implications

- 6.1 The Equality Act 2010 introduced a new public sector equality duty under section 149. It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Council must, in exercising its functions, have “due regard” to the need to:
1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 2. Advance equality of opportunity between people who share a protected characteristic and those who do not.
 3. Foster good relations between people who share a protected characteristic and those who do not.
- 6.2 The joint application has been subject to an Equality Analysis Assessment which is attached as Appendix D. The assessment identifies no potential negative impacts in relation to different equality groups at this stage, but identifies that a further assessment will need to be undertaken when the draft Neighbourhood Plan is submitted to the council.
- 6.3 The Neighbourhood Planning Regulation 2012 requires the council to ensure that those applying for neighbourhood forum and neighbourhood area status are representative of the area to be covered. Harlesden Forum satisfied this requirement.

7.0 Staffing/Accommodation Implications

- 7.1 Either additional staff resources will be necessary to support neighbourhood planning, depending upon the number of Plans that are taken forward, or staff resources will be diverted from other plan making projects to provide support and advice.

8.0 Environmental Implications

8.1 A neighbourhood plan will allow local communities to focus better on local planning issues relevant to their particular area and there is potential for measures to be proposed and implemented that would lead to improvements to the local area's environment.

9.0 Contact Officers

9.1 Claire Jones, Principal Planning Officer, Planning Policy and Projects

E-mail: Claire.Jones@brent.gov.uk

Telephone: 020 8937 5301

Andy Donald Strategic Director, Regeneration & Growth

Agreed Date: 28th
September 2015

APPENDIX B: BRENT COUNCIL SEA SCREENING OPINION

Harlesden Neighbourhood Plan Strategic Environmental Assessment Screening Opinion



**Prepared by Brent Council and OPDC on behalf of Harlesden Neighbourhood Forum
November 2016**

Legislative Background

Strategic Environmental Assessment (SEA) is a way of ensuring the environmental implications of a plan or programme for 'town or country planning or 'land use' are taken into account. The need for environmental assessments is set out in the EU Directive 2001/42/EC (hereafter referred to as the SEA Directive). This has subsequently been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (hereafter referred to as the SEA Regulations).

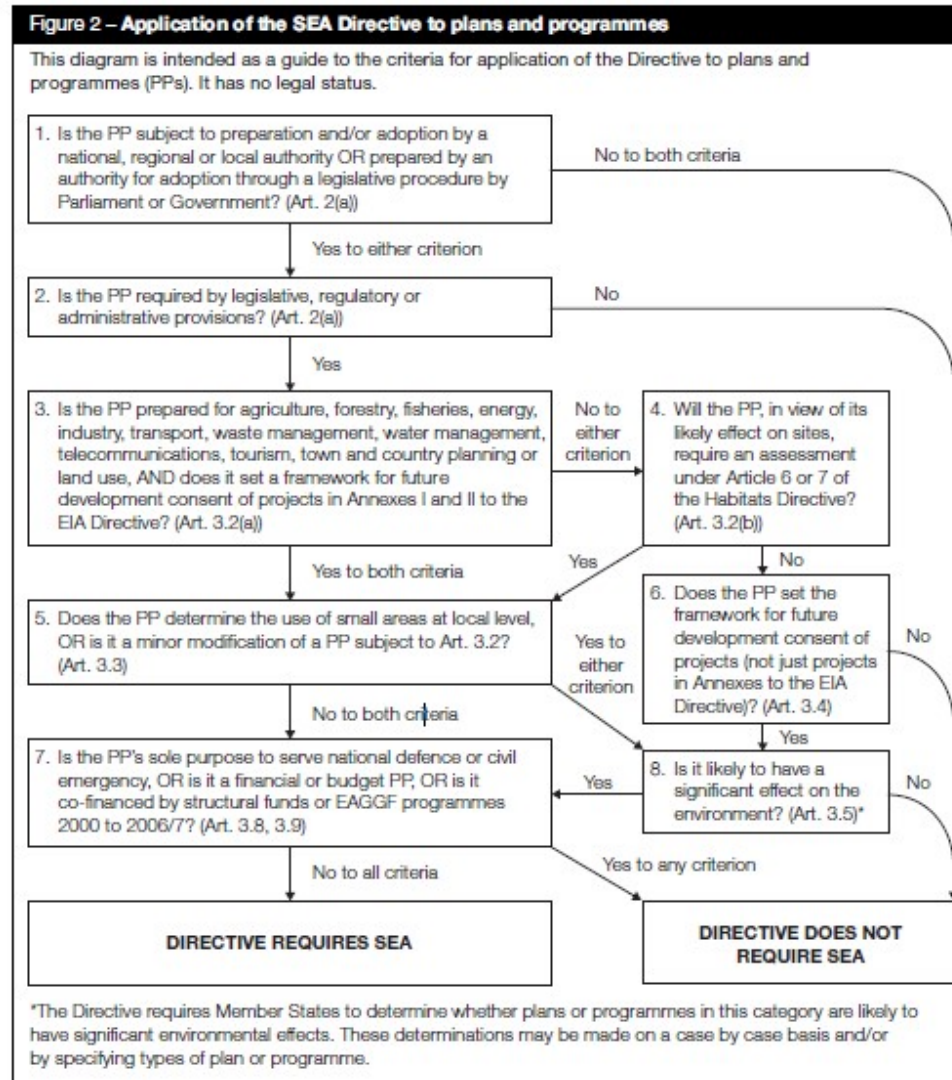
The Government's Planning Practice Guidance states in some limited circumstances, where a neighbourhood plan could have significant environmental effects, it may fall within the scope of the SEA Regulations and so require an SEA. Whether a neighbourhood plan requires an SEA, and (if so) the level of detail needed, will depend on what is proposed in the draft neighbourhood plan. An SEA may be required, for example, where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

To determine whether the draft Harlesden Neighbourhood Plan might have significant environmental effects, its potential scope has been assessed against the criteria set out in Schedule 1 to the SEA Regulations.

Screening Process

The screening opinion assessment is undertaken in two parts: the first part will assess whether the plan requires SEA (as per the flow chart which follows); and the second part of the assessment will consider whether the neighbourhood plan is likely to have a significant effect on the environment, using criteria drawn from Schedule 1 of the SEA Directive and the SEA Regulations.



(Extracted from A practical Guide to the SEA Directive, DCLG, 2005)

Summary of the Neighbourhood Plan

Details of Neighbourhood Plan	
Name of Neighbourhood Plan	Harlesden Neighbourhood Plan
Geographic Coverage of the Plan	<p>The Harlesden Neighbourhood Area is located predominantly within the London Borough of Brent, but includes land within the London Boroughs of Ealing and Hammersmith & Fulham. Part of the neighbourhood area to the south falls within the Old Oak Opportunity Area, now also a Mayoral Development Corporation Area. On 1 April 2015 the Old Oak and Park Royal Development Corporation (OPDC) became the local planning authority for this land.</p> <p>A copy of the boundary map is included in Appendix A. The neighbourhood area to the north is bounded by Craven Park Road, encompasses Roundwood Park, and is bounded by Doyle Gardens and All Souls Avenue to the east. To the south the boundary generally follows the Brent borough boundary however, includes a bus depot site falling within Ealing and Station Approach the access road to Willesden Junction Station, which is within Hammersmith & Fulham. The neighbourhood area includes Willesden Junction Station and Harlesden District Town Centre.</p>
Vision of the Plan	‘... 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.’
Key Issues/Objectives	<ul style="list-style-type: none"> • 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 existing community facilities. • Provide a new community hub which can act as a focal point for the area.

Summary of Policies	<p>In summary the policies in the Plan are as follows:- H1 identifies eight sites for housing development.</p> <p>H2 sets density ranges for housing development.</p> <p>H3 allows for a loss of housing along Station Road where it will create active frontage. CF1 seeks to secure a site for community space.</p> <p>CF2 identifies public houses to be protected in line with Brent Council’s emerging public house protection policy.</p> <p>E1 seeks to secure new open space on the redevelopment of sites over 0.5ha.</p> <p>E2 promotes local food growing opportunities.</p> <p>E3 seeks to secure play space, including a safer streets scheme.</p> <p>E4 identifies non-designated heritage assets.</p> <p>E5 seeks to secure a town square as part of redevelopment of Harlesden Plaza.</p> <p>E6 seeks to ensure development along gateways adds to a sense of arrival.</p> <p>E7 seeks to secure public art as part of the development of large sites within the town centre.</p> <p>E8 requires mitigation for the loss of trees.</p> <p>E9 directs taller buildings to Willesden Junction Station and Harlesden Plaza, subject to impacts on surroundings including the conservation area.</p> <p>LE1 where local employment sites are redeveloped seeks to ensure existing businesses are relocated.</p> <p>LE2 sets design criteria for new shopfronts.</p> <p>LE3 promotes the development of retail floorspace in Harlesden Town Centre.</p> <p>T1 requires development at Willesden Junction Station to improve cycle and pedestrian links to Harrow Road and Station Road.</p> <p>T2 seeks to ensure car parking is retained as part of the redevelopment of Harlesden Plaza/car park site.</p> <p>T3 seeks to secure improved cycle route and cycle parking.</p> <p>T4 seeks to secure improvements to the pedestrian environment along Station Road to the High Street. D1 sets priorities for Neighbourhood CIL including public realm improvements, tree planting, cycle routes, provision of public open space, play space and a community facility.</p>
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Summary of Screening Opinion

Local Authority Details	
Name and job title of officer undertaking screening opinion	Claire Jones, Principal Planner, Brent Council
	Peter Farnham, Principal Planner, OPDC
Date of assessment	January 2017
Conclusion of assessment	SEA is not required
Reason for conclusion	It is concluded that the Harlesden Neighbourhood Plan in its current form is unlikely to have significant environmental effects.

Assessment I: Screening Assessment Establishing the Need for SEA Stage

Stage	Y/N	Reason
1. Is the Neighbourhood Plan (NP) subject to preparation and/or adoption by a national, regional or local authority, OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y	The preparation and adoption of the NP is allowed under the Town and Country Planning Act 1990 as amended by the Localism Act 2011. The NP has been prepared by the Harlesden Forum (as the 'relevant body') and will be 'made' by Brent Council and the Old Oak and Park Royal Development Corporation as the local planning authorities. The preparation of NPs is subject to the following regulations: The Neighbourhood Planning (General) Regulations 2012 and The Neighbourhood Planning (referendums) Regulations 2012. GO TO STAGE 2
2. Is the NP required by legislative, regulatory or administrative provisions? (Art. 2(a))	Y	Whilst the NP is not a requirement and is optional under the provisions of the Town and Country Planning Act as amended by the Localism Act 2011, it will if 'made', form part of the Development Plan for the District. It is therefore important that the screening process considers whether it is likely to have significant environmental effects and hence whether SEA is required under the Directive. GO TO STAGE 3

<p>3. Is the NP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art. 3.2(a))</p>	<p>Y the NP has been prepared for the purposes of town and country planning and</p> <p>N the scale of development will be below the threshold set in the EIA</p>	<p>The NP is being prepared for the purposes of town and country planning. It includes proposals for seven sites. These are:</p> <ol style="list-style-type: none"> 1. Harlesden Plaza – a 0.9ha site currently in use as a car park and retail uses. The site is identified as suitable for ground floor commercial, with residential above, community space, a town square and replacement car parking. This is broadly consistent with the allocation in Brent Council’s Site Allocations DPD which has been subject to SEA.
	<p>Directive Annexes I and II</p>	<ol style="list-style-type: none"> 2. Salvation Army and Manor Park Works – 0.2ha site containing Salvation Army hall and former industrial building. The site is identified for redevelopment for residential and a new Salvation Army hall. This is broadly consistent with the allocation in Brent Council’s Site Allocations DPD which has been subject to SEA. 3. Harley Road – a 0.1ha open yard is identified as suitable for small scale residential. 4. Royal Mail Delivery Office – 0.1ha delivery office and yard identified for commercial ground floor and residential use above. 5. Former Brent South Mental Health Office – 0.05ha vacant office identified as suitable for residential. 6. Land at Challenge Close and Rear of 50-70 Craven Park Road – 0.15ha vacant land to the rear of shops identified as suitable for small scale residential. 7. Car sales at the Junction of High Street and Furness Road – 0.1ha open car sales plot identified as suitable for residential and ground floor commercial.

		<p>In addition, the NP includes design parameters for Willesden Junction station. The station is identified for redevelopment in the draft OPDC Local Plan. The NP provides further guidance on how the station should connect to the wider area.</p> <p>The NP contains a framework for future development consent of urban development projects (listed as 10(b) in Annex II of the EIA Directive), however, the sites identified redevelopment do not exceed the threshold of 0.5ha, with the exception of Harlesden Plaza which has already been subject to SEA through the Brent Site Allocations DPD. The NP provides guidance on how the redevelopment of Willesden Junction station should connect to the surrounding area, but does not propose uses but instead cross references policy on suitable uses in the emerging OPDC Local Plan, which has been subject to SEA. The NP also does not propose redevelopment on a significantly greater scale than current uses, or of a type markedly different in nature.</p> <p>GO TO STAGE 5</p>
4. Will the NP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2(b))	NOT APPLICABLE	
5. Does the NP determine the use of small areas at local level OR is it a minor modification of a plan or programme subject to Art. 3.2? (Art. 3.3)	Y	<p>The NP includes policies which will guide the redevelopment of sites within the neighbourhood area as outlined above. The policies in relation to development on these sites are consistent with the NPPF, London Plan, Brent's strategic policies and the emerging OPDC Local Plan.</p> <p>GO TO STAGE 8</p>
6. Does the NP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art. 3.4)	NOT APPLICABLE	

7. Is the NP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget plan or programme, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art. 3.8, 3.9)	N	The NP does not fall into any of the criteria listed.
8. Is it likely to have a significant effect on the environment? (Art 3.5)	N	See Assessment 2: Likely significant effects on the environment GO TO STAGE 7

Assessment 2: Likely Significant Effects on the Environment

SEA Directive criteria and Schedule 1 of Environmental Assessment of plans and programmes Regulations 2004	Brent Council assessment	Likely significant environmental effect?
Characteristics of the Neighbourhood Plan, having regard to:		
The degree to which the Plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	The NP would, if made, form part of the statutory Development Plan and as such does contribute to the framework for future development consent of projects. NP policies will guide the redevelopment of sites in the neighbourhood area. However, the NP sits within the wider framework of the National Planning Policy Framework (2012), the Brent Core Strategy (2011) (together with the Site Allocations and Development Management Policies), and emerging OPDC Local Plan therefore the projects for which this NP helps to set a framework are localised in nature and have limited resource implications.	N
The degree to which the Plan influences other plans and programmes including those in a hierarchy.	The NP is in conformity with the National Planning Policy Framework. The policies within the NP are also in general conformity with the Council's and OPDC's strategic policies and complement the Brent Core Strategy, and emerging OPDC Local Plan. The NP should not significantly influence other plans and programmes, but may have a limited degree of influence over the formation of future strategic policies.	N

The relevance of the Plan for the integration of environmental considerations in particular with a view to promoting sustainable development.	The NP is expected to work to protect and enhance the natural environment of the area. The NP seeks to protect trees and ensure any loss is mitigated, and secure additional open space as part of larger scale developments.	N
Environmental problems relevant to the Plan.	There are no flood risk zones within the NP area. The NP area falls within an Air Quality Management Area, however, planning policy on air quality is set out in the London Plan and does not need to be repeated in the NP.	N
The relevance of the Plan for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	The NP is not directly relevant to the implementation of European legislation including the Water Framework Directive. There are no water bodies within or in proximity to the neighbourhood area, meaning there are no opportunities to improve water quality through locally specific policies or interventions. London Plan policy requiring Sustainable Urban Drainage Systems already applies across the neighbourhood area, and will help contribute to the objectives of the Directive.	N
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		

The probability, duration, frequency and reversibility of the effects.	<p>The NP is likely to have short-term effects resulting from activity associated with the development of sites. However, the development of Harlesden Plaza and Manor Works has been identified for development in the Brent Local Plan, and the redevelopment of Willesden Junction in the emerging OPDC Local Plan. Both of which are subject to SEA. These developments could therefore come forward in line with existing and emerging policy outside of the NP.</p> <p>The NP identifies appropriate uses for seven sites. These uses are consistent with the NPPF, London Plan and Brent's and OPDC's strategic policies.</p> <p>In the long-term the NP seeks to secure additional housing, commercial development, community facilities, play space and open space. Therefore positive social, environmental and economic impacts are predicted. It is not anticipated the policies will result in significant long-term effects.</p>	N
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The cumulative nature of the effects of the Plan.	The NP is in general conformity with the strategic policies. It is intended that the effects will have a positive cumulative benefit for the area.	N
The trans-boundary nature of the effects of the Plan.	No screened European Sites are within or adjacent to the borough, the closest site being Richmond Park 8km away from the southern boundary, and subsequently distance limits the potential impacts of development in the neighbourhood area on the screened European Sites. There are not expected to be any significant trans-boundary effects.	N
The risks to human health or the environment (e.g. due to accidents).	There are no significant risks to human health. Indeed, the NP is likely to have a positive impact on human health by seeking to secure additional housing, community facilities, play space and open space.	N
The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected) by the Plan.	The NP has a limited geographical scope. The Harlesden NP is located within the ward of Harlesden, and also partly within Kensal Green, Willesden Green and Stonebridge. It is estimated the population of the area is approximately 18,900 (Census 2011). Parts of the area fall within the London Boroughs of Ealing and Hammersmith & Fulham, however, there are no residents in these areas.	N
The value and vulnerability of the area likely to be affected by the Plan due to: - Special natural characteristics or cultural heritage;	There are no Sites of Special Scientific Interest within the neighbourhood area. The Silverlink Metro Line between Willesden Junction and Brondesbury to the south of the site is a Grade I SINC and wildlife corridor. Impacts on the corridor will need to be considered as part of the Willesden Junction Station redevelopment; however, strategic policy relating to the station development will be set out in the OPDC Local Plan rather than the NP.	N
	Roundwood Park is a Grade II SINC. The NP does not contain any policies which will impact on Roundwood Park. Harlesden Conservation Area and an Archaeological Priority Area are located within the NP boundary. In addition there a number of listed buildings including The Jubilee Clock (Grade II), Church of All Souls (Grade II*), Church of our Lady of Willesden (Grade II), The Green Man Public House (Grade II) and non-designated heritage assets. The NP identifies non-designated heritage assets, seeks to protect public houses (a number of which are listed or locally listed) by reiterating Brent's emerging public house protection policy. In addition it seeks to secure enhancements to the public realm which will help to enhance the character of the conservation area.	

	Policy in relation to archaeology and the protection of heritage assets is included in the Brent Development Management Policies.	
<ul style="list-style-type: none"> - Exceeded environmental quality standards or limit values; or - Intensive land use 	<p>The NP is not expected to exceed environmental quality standards or limit values.</p> <p>The NP seeks to guide development in keeping with the principles of national, regional and local strategic policy. The sites identified for development in the NP are of a small scale, with the exception of Harlesden Plaza which is allocated in the Brent Site Allocations DPD and has been subject to SEA.</p>	<p>N</p> <p>N</p> <p>N</p>
The effects of the Plan on areas or landscapes which have recognised national, community or international protection status.	There are no Areas of Outstanding Natural Beauty (AONB), Areas of Great Landscape Value (AGLV) or locally protected views located adjacent to or within the NP area.	N
Assessment 2 Conclusion		The Harlesden NP is unlikely to have a significant effect on the environment.

Conclusion

As a result of the Screening Assessment, it is concluded that the Harlesden Neighbourhood Plan in its current form is unlikely to have significant environmental effects. The Plan accords with Brent's strategic policies which have undergone full SEA, as well as the emerging

OPDC Local Plan, national and regional policies. As such the Harlesden Neighbourhood Plan does not require a full SEA to be undertaken.

Appendix C: Harlesden Neighbourhood Area Boundary Map

