

LOCAL PLAN 2018 Preferred Options consultation: Response from QPARA

Queen's Park Area Residents Association (QPARA) members discussed this proposal at their meeting in December and this response is on behalf of its members. This is in addition to our submission (March 2018) to the earlier consultation.

We applaud this well written and presented document which we support generally. There are some aspects we feel could better reflect Queen's Park (QP) area, notably the QP Conservation Area and the interests of residents and QPARA members in particular. We look forward to continuing our contact with the Planners and notification of further consultations. Members suggested that a Neighbourhood Plan could reflect the diversity of interests in the QP area.

We support the challenge to the proposed London Plan housing target. Generally concern was raised about the increasing population and its impact on housing and associated infrastructure, on health, roads, schools, medical facilities, jobs, appropriate green spaces, heritage assets and character and quality of life.

Sect 2. INTRODUCTION

2.1.1 – 2. As well as encompassing the Plans mentioned, this Local Plan should be integrated with Brent's Transport LIP3 on which QPARA submitted extensive comments.

2.1.5. The most important feature of this Local Plan is that it is based on the assumption derived from the London Plan that Brent must add 64,900 people to its population by 2041. This would mean an annual rate of building of 2915 dwellings per year as compared with the current target of nearly 1600. This is an extraordinary level of growth with massive consequences in terms of roads, schools, medical facilities, jobs and appropriate green space. If Brent's population were expected to remain static it would be a big challenge to plan for significant improvements in quality of life and the environment. With the increase in numbers predicted the task is well nigh impossible, partly due to increased air pollution and road congestion and the absence of green-space near the main sites proposed for new housing. We support the Council's rejection of the 2915 dwellings per year target and suggest that even reaching the current target in a sustainable way will be a major challenge.

Sect 3. SPATIAL PORTRAIT

3.1.1. Wembley Stadium is picked out as an iconic feature of the Borough but nobody visits or comes to live in Brent to see it, other than as the home for a major sporting or entertainment event. Indeed the Stadium's impact on its immediate neighbours is problematic. What is desirable about Brent is the quality and durability of the dwellings erected between 1890 and 1914, along with the parks adjacent to them, together with good access to the centre of London. Unlike the monolithic slab blocks built to provide council housing in the 60s and 70s they have not had to be demolished at huge financial and social cost. An unfortunate consequence of the desirability of what were originally fairly modest artisan dwellings is that they are now priced out of the range of the majority of newcomers on average incomes. In particular the needs of people for housing at the equivalent to council rents (i.e. social housing rents) are understated.

3.1.4. Reference is made to Brent's population being on average younger than the national profile but this is likely to change over time and be influenced by future immigration policies, as yet unknown. Planning must look ahead beyond the immediate demographic profile.

3.1.6 – 10. While the character of development north and south of the North Circular Road is well described the spatial portrait seems to overlook the severe traffic congestion in such town centres as Wembley and Willesden High Roads and how unattractive this makes them for pedestrian shoppers. While competition from major centres such as Brent Cross and Westfield is noted, competition from convenience stores and online retail shopping is not. The rapid evolution of the retail scene would benefit from more attention.

3.1.19. When considering the health scenario it should be noted that the majority of people in the southern sections of Brent look to Imperial Healthcare NHS Trust (St Mary's etc) as their main provider of acute and outpatient services. Not mentioned in the Local Plan is the fact that Brent CCG is part of a NW London Collaboration of CCG's covering 8 boroughs. Since 2012 the CCGs have been promoting a plan, *Shaping a Healthier Future*, to reduce the number of acute hospitals from 9 to 5 and to close certain A&E facilities, including that at Central Middlesex. The capital requirements of this strategy were said to be over £1 billion but after reducing their initial bid for central funds to £513 million in 2016 and then to £260 million earlier in 2018 the Collaboration were told in December 2018 that even this bid was rejected. QPARA looks to the Borough to hold the local NHS properly to account on these major strategic proposals affecting the health of its residents. The fact is that with or without capital allocations there are serious shortages of key NHS personnel such as doctor and nurses. The Borough's planning policies have a part to play in making the area one to which vital healthcare practitioners will want to move when jobs are offered.

3.1.23. We support a policy of improving local town centres. Ideally shopping and other pedestrian activities should be separated from traffic but for the most part this would not be possible without major and unacceptable demolition of existing buildings. However minor improvement works to the streetscape of Salusbury Road, including repaving and tree planting in partnership with QPARA, demonstrate what can be done at fairly modest cost to keep local centres attractive.

3.1.24. There is a brief mention of Brent's 22 conservation areas at this point but more could be made of the value they add to the quality of life. As highly desirable features of the Brent landscape strong policies are needed to ensure that they are conserved and enhanced. Brent's public parks, including Queen's Park, should also be seen as an important part of the cultural heritage from the late 19th century. They now serve recreational, health and environmental needs for people living in the surrounding areas and require judicious management involving local residents to adapt to changing pressures from modern lifestyles.

3.1.27. Mention is made of a lack of green spaces in many parts of Brent but it is not clear how this is to be remedied. A number of sites listed in the Plan as suitable for considerable numbers of dwellings appear to be away from green space in congested town centre locations

Sect 4. SPATIAL VISION

We particularly support the proposal, paras 4.1.3 – 16 which are relevant to QP. No mention is made of the over-development of existing properties – loft and side extensions, basements – nor is there any reference to the need to consider the detrimental effects of works to residents while being undertaken – Considerate Constructors' Scheme, noise, dust, traffic plan, over prolonged periods. Reference to appropriate sources should be included when planning applications are being considered. This should be emphasized in the plan as well as referring to the relevant SPDs.

Sect 5. SOUTH EAST

5.6.2 – 3. There is no mention of the historically important Queens Park with its 33 acre park created in 1887 a continuing source of activity and local resource to this day. One of the 8 CAs referred to in the south east. It has featured multiple times as a film location.

5.6.6. Where is this QP Creative Quarter? We have creative businesses all around our area.

OPEN SPACE AND BIO DIVERSITY

t. Tree planting/replacement to be delivered and maintained in CAs.

Streetscene vistas in CAs are an integral part: trees and pavements should be preserved and enhanced. Replacement of traditional pavement materials on a like-for-like basis should be the default, not cheap substitutes like tarmac. It dilutes the integrity of an area and must be resisted.

TRANSPORT

w. Not limited to A5; north-south access routes such as Chamberlayne Road and Salisbury Road recognised as being congested and the source of poor air quality need to be improved.

5.6.13. Important north-south routes in town centres on the edges of CAs must not have tall developments where they could impact adversely on the adjoining CA; they should be restricted in height to reflect the local context, irrespective of whether they are within a CA.

5.6.24. Lonsdale Road is an important small business area as well as an eating location between 2 CAs. It is important that the character of this road is preserved and planning proposals do not dilute the road into a mixed residential and business use where high rents could alter the character. Members have asked if a planning classification could be employed to prevent over development or that the road could be incorporated into the QPCA.

It will be noted the number of developments in the South Kilburn Growth Area that describe QP tube station as being within walking distance. The requirement that Queens Park station can absorb the increased number and demand means that the plan must envisage enhancement of the existing access, notably for the disabled. They have been largely ignored in the plan.

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