Brent Retail & Town Centres Evidence Base:

Strategy & Recommendations Report (Document C)

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urban shape

REGENERIS

Brent

urban shape

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1 | Introduction

1. Introduction

1.1 Urban Shape and Hatch Regeneris have been instructed by Brent Council to develop a comprehensive evidence base on the characteristics, current performance and vitality and viability of Brent's network of town, district and local centres, and identifying the Borough's future retail and commercial leisure needs. The research provides a full update of the Borough's previous town centre and retail evidence base, which was prepared in 2008.

1.2 The new evidence base has been prepared to serve a number of purposes, including: to inform the preparation of the Council's new Local Plan, to inform day to day town centre management activities and initiatives, to assist in the determination of planning applications for new retail and other 'main town centre uses' in the Borough, and to inform wider strategy and planning regarding future town centre and economic development strategy across the .

1.3 The full evidence base is set out across four documents:

- **Technical Document A, the Brent Retail & Leisure Study 2018**: provides a quantitative and qualitative assessment of the future retail and commercial leisure needs which the Borough will need to plan for in its new Local Plan.
- **Technical Document Bi, Brent Town Centre Health Check Study 2018:** sets out the current performance of the Borough's network of town, district and local centres, identifying strengths and weaknesses of the existing offer and assessing their current levels of vitality and viability.
- **Technical Document Bii, Brent Town Centre Profiles, 2018**: supports the main Town Centre Health Check report, and provides a centre by centre summary of the characteristics of each of Brent's town centres.

1.4 This document, the **Brent Retail, Leisure and Town Centres Strategy & Recommendations Report (Document C)** forms the fourth document, and has been developed to draw together key findings from across the evidence base, and, based on this, to provide a central set of recommendations regarding the future of Brent's town centres, and retail and leisure need in the Borough more generally. The findings in this report should be read alongside the other technical documents which form this study, as set out above. This document is supported by a series of maps at **Appendix 1**, which map our recommendations in respect of the definition of town centre boundaries, Primary Shopping Areas, and Primary and Secondary Shopping Frontages in the Borough's network of centres.

Structure of report

1.5 This Strategy & Recommendations Report is structured as follows:

- **Section 2** provides a concise summary of the key messages and trends emerging from the technical evidence base, including an assessment of key strengths, weaknesses, opportunities and threats.
- **Section 3** sets out Borough-wide recommendations emerging from the evidence, including planning policy recommendations; advice on the hierarchy of centres and suggested alterations to town centre boundaries and frontages; the use of Article 4 directions, town centre strategy & management; town centre vitality & diversity, and future monitoring.
- **Section 4** sets out sub-area and town centre-specific recommendations.
- **Section 5** sets out resourcing and delivery considerations.

2 | Key findings from the Joint Evidence Base

2. Key findings from the Joint Evidence Base

2.1 In this section, we set out the wider national retail and leisure market context within which the study has been prepared. This covers a number of different strands – current and projected economic performance, online shopping, the changing role of the town centre and the increasing role of commercial leisure, and changing food shopping habits – but each of these strands should not be considered in isolation.

2.2 The trends identified in this section inform the findings of the remainder of the study, and the development of its strategic recommendations. Where relevant, we make reference to local examples to demonstrate these impact of these sectoral changes at the local level in Brent.

The role and future of town centres

2.3 The model of the traditional town centre is arguably being challenged more currently than at any time in its history. The role and function of town centres at all levels of the hierarchy is going through a period of substantial change as a headwind of factors including changing consumer shopping habits, an uncertain 'Brexit' economy, and the continued role of online shopping all present new challenges for town centres. Sectors which have emerged in recent years – such as the casual dining restaurant sector – are now facing their own challenges and there are signs this market may be reaching saturation.

2.4 There remain, however, clear opportunities for town centres – for example click & collect can generate linked trip spend, and the change in convenience (food) shopping habits towards 'little and often' shopping– but town centres will increasingly look beyond retail as their sole generators of footfall in future years. Successful town centres will be those which can provide a broad range of uses which cement and enhance their appeal as 'destinations', rather than solely places to come for shopping. Higher-order town centres (such as Kilburn and Wembley) in particular will need to ensure a diverse, vibrant retail, leisure, residential and employment offer to cement and enhance their long term vitality and viability.

Sub Regional Context

2.5 Brent is surrounded by a number of 'higher-order' retail destinations - including Shepherd's Bush and Harrow, which are defined as Metropolitan Centres in the Draft London Plan (2017), as well as Brent Cross Shopping Centre, which the Draft London Plan identifies as a future potential Metropolitan Centre (although it is currently unclassified). Many residents of Brent also benefit from good access to central London and its internationally-renowned retail, leisure and cultural offer. The presence of these shopping destinations outside the Borough boundaries means that loss of expenditure, particularly in terms of comparison goods spending, is inevitable, as patterns of shopping are not 'closed' systems.

2.6 The household survey undertaken in support of this study identified the most popular destination for comparison goods shopping for residents in the survey area is Brent Cross / Staples Corner, which draws £523.20m of comparison goods spend from the survey area. This is followed by Central London (£177.44m) and Harrow (£145.23m). The locations within Brent which attract the highest comparison goods turnovers are Kilburn (£99.60m) and Wembley (£48.11m). Shepherd's Bush, which includes the Westfield London development which was not trading at the time of the preceding household survey (in 2008), draws £78.85m of spend. A Phase 2 extension to Westfield London has recently opened, subsequent to completion of the household survey.

2.7 Brent Cross has increased its market share from the survey area by 8.3 percentage points since the 2008 survey and the significant investment in the extension of Brent Cross which could potentially come forward over the study period may result in further market share being lost. Central London's market share has declined since the 2008 survey, likely as a consequence of the opening of Westfield London, whilst Harrow's has remained unchanged.

2.8 Kilburn and Wembley town centres have the highest comparison goods turnovers, reflecting their role as 'major' centres, although Kilburn's turnover is approximately double that of Wembley. Kilburn faces competition for 'market share' from Central London and Brent Cross, but positively the proportion of market share which the centre claims from its local catchment has increased marginally since the 2008 Study. Wembley has to compete with a wider number of larger/higher-order centres and destinations, including Harrow, Brent Cross, Central London and Shepherd's Bush. The proportion of market share which Wembley draws from its local catchment has halved since the 2008 Study. Whilst developments such as the opening of the London Designer Outlet have enhanced its retail offer, there is a need for improved integration between the new developments and the 'historic' town centre to enable all areas of the centre to benefit.

2.9 Brent's other centres have lower comparison goods turnovers; this reflects the fact that many of the district centres they have a more localised shopping function which is more oriented towards meeting day-to-day shopping needs rather than being non-food shopping 'destinations'. However, three district centres (Harlesden, Kingsbury and Cricklewood) have comparison goods turnovers in excess of £20m, a reflection that in these cases, the comparison goods offer in the centres is more substantial.

Retail and Leisure Trends across the Borough

2.10 The household survey results identify that 61.8% of comparison goods spending is retained by centres and stores in the survey area; this 'retention rate' is a noticeable increase from the retention rate of 51.2% identified in the 2008 Study. It is, however, skewed by the inclusion of Brent Cross within the survey area, and centres and stores within Brent itself only account for 28.6% of total comparison goods spend, a slight increase from the equivalent figure of 26.8% identified in the 2008 Study. As identified above, the Borough's two 'major' centres, Kilburn and Wembley, are the two most popular destinations for comparison goods shopping.

2.11 In terms of convenience goods shopping, the household survey results indicate that notwithstanding the changes in convenience goods shopping patterns which have taken place in recent years, the majority of food shopping in the survey area continues to be undertaken in large superstores, most of which are not located within defined centres. There is currently £1.21bn of convenience goods spend available to the survey area. Of this, £916.85m (74.5%) is spent within main foodstores in the survey area. A further £35.78m (2.9%) is spent at local / specialist convenience goods shops in Brent's network of town, district and local centres.

2.12 The foodstores drawing the highest turnover from residents in the survey area by some margin are Asda stores in Wembley (£89.01m convenience goods turnover) and Colindale (£74.92m), which was also the case in the 2008 Study. Branches of Sainsbury's in Kilburn, Alperton, Kenton and Willesden, and a branch of Morrisons in Queensbury, each draw more than £30m in convenience goods spend from the survey area. The majority of convenience goods floorspace in the survey is 'over-trading' when compared to operator company average levels, although two superstores - the Tesco Extra at Brent Park and a recently-opened Morrisons at Colindale, both appear to be trading at below average levels.

2.13 Brent is a diverse Borough and a number of the centres play important roles as destinations for specialist ethnic and world food and non-food shopping. The household survey identifies Kingsbury, Harlesden, Ealing Road and Wembley as being important destinations for ethnic food shopping, with Ealing Road and Wembley acting as important destinations for ethnic non-food shopping. For

Kingsbury and Ealing Road in particular, the role of ethnic food/non-food retailing appears to make a significant contribution to the overall attraction of the centre with a noticeably high number of these retailers present in the centre.

2.14 Residents in the Borough partake in a wide range of commercial leisure activities, the most popular of which is visiting the cinema. The offer of the Borough in this respect has been enhanced by the opening of the Cineworld in the London Designer Outlet, although the most popular destinations for cinema visits all fall outside the Borough, largely a reflection that for many residents it is easier to access these facilities.

2.15 The household survey identifies that a number of centres in the Borough - particularly the local centres of Queen's Park, Kensal Rise and Sudbury, as well as the district centre of Kingsbury are popular evening economy destinations and it is apparent that these uses make an important contribution to the overall vitality and viability of the centres. The survey results also identify that both Wembley and Kilburn do not capture particularly strong market shares for evening economy uses. For example, both Wembley and Kilburn only draw 22% of the market share from their respective local catchments for visits to restaurants, and Wembley only draws a market share of 14% from its local catchment for visits to pubs and bars.

The Current Characteristics and Performance of Brent's Town Centres

2.16 Brent has a broad and diverse hierarchy of 17 town centres, comprising: 2 Major Centres (Wembley and Kilburn), 11 District Centres and 4 Local Centres.

		All Brent Town Centres
No. of Units		3,376
Amount of Floorspace		582,900 m²
Employ.		25,400
Business Rates (£m)		£88m
Type of Premises	A1	1,770 units (53%)
	A2	400 units (12%)
	A5	220 units (7%)
	B	210 units (6%)
Vacancy		247 units (7%)
Multiples		562 units (17%)
Night-time		595 units (18%)
Betting Shops		88 units (3%)

Economic and Community Importance

2.17 These town centres are a central component of the borough's economic and community foundations. They provide over 25,400 jobs across the borough (around 20% of all jobs) and serve a diverse range of needs, from providing transport connections, to supporting local jobs, to being a place where communities meet. They are highly social, diverse and accessible places, and play an important role in supporting social, economic and environmental benefits across the borough.

Characteristics

2.18 Retail remains at the heart of Brent's town centres, typically accounting for between 52% and 86% of floorspace. The major centres have a stronger comparison goods function, whilst district and local centres have a function orientated towards day-to-day convenience goods shopping and retail services such as dry cleaners and hair & beauty salons. The mixture of shops and services reflects Brent's diverse mix of people, with many of the town centres notable for their high density of ethnic and specialist retail and service activities. Most of the Borough's centres are served by one or more supermarket, and, as identified above, some have important evening economy functions, although both Wembley and Kilburn offer scope for improvement in respect of this.

2.19 A summary of the key characteristics of each of the Borough's centres is shown overleaf.

Performance

2.20 Relative to other town centres across London, the performance of Brent's town centres reflects the diversity of the borough, with no clear patterns emerging. Surveys undertaken on town centre users (including businesses, community groups and residents) found that perceptions of Brent's town centres were generally negative. Key improvements that were sought after generally revolved around the need to improve the public realm and transport environment, improving the attractiveness of town centres.

Major Town Centre Ranking *(Out of 34 Major Centres)*

Town Centre	Vacancy Rate *Lowest = 1st*	Employment *Highest = 1st*	Retail Floorspace *Highest = 1st*	% Convenience *Highest % = 1st*	% Betting Shops *Lowest % = 1st*
Wembley	26th	17th	31st	28th	30th
Kilburn	30th	34th	21st	15th	29th

District Town Centre Ranking *(Out of 151 District Centres)*

Town Centre	Vacancy Rate *Lowest = 1st*	Employment *Highest = 1st*	Retail Floorspace *Highest = 1st*	% Convenience *Highest % = 1st*	% Betting Shops *Lowest % = 1st*
Burnt Oak	26th	97th	20th	87th	90th
Colindale/ The Hyde	84th	127th	147th	93rd	144th
Cricklewood	63rd	88th	40th	111th	118th
Ealing Road	32nd	127th	123rd	129th	120th
Harlesden	90th	70th	18th	53rd	110th
Kenton	7th	114th	62nd	13th	2nd
Kingsbury	6th	127th	80th	16th	50th
Neasden	130th	127th	121st	20th	136th
Preston Road	15th	N/A	130th	72nd	83rd
Wembley Park	5th	3rd	60th	7th	65th
Willesden Green	125th	97th	75th	49th	92nd

Source: GLA London Town Centre Healthcheck, 2017
Note: Cells highlighted orange are in the top quarter of their classification, cells highlighted blue are in the bottom quarter

Local Opportunities for Growth

Future Needs of Brent's Retail Sector

2.21 Our study has identified the following levels of quantitative retail (class A1), A3 and A4 floorspace which the Borough will need to plan for over the period to 2028. The Council's new Local Plan runs to 2041, however it is advised that retail and commercial leisure needs forecasts are updated over the course of the Plan period to reflect changes in economic circumstances, online shopping, new population projections and so on. Accordingly, the floorspace 'need' figures shown below are presented for the first ten years of the Plan period, to 2028. Need figures over the full Plan period to 2041 are also provided in Document A.

2.22 The quantitative needs have been identified at the sub-area level, reflecting the approach to policy formation which the Council anticipates following in its new Local Plan. Further details of the sub-areas are provided in Section 4 of this report, which also recommends that the Council may wish to consider jointly planning for the needs of the Central sub-area (Wembley Park) and South sub-area (Wembley, Ealing Road and Sudbury), given their conjoining boundaries and close functional relationship.

Table 2.1 | Summary of quantitative retail & class A3 and A4 leisure needs at 2028

Sub-area	Key centres	Class A1 Comparison goods need at 2028 (sq.m net)	Class A1 Convenience goods need at 2028 (sq.m net)	Class A3 Restaurants/ Cafes need at 2028 (sq.m)	Class A4 Pubs/Bars need at 2028 (sq.m)
Central	Wembley Park	300*	-1,800*	-8,900*	-10.500*
North West	Kenton, Preston Road	900	500	100	100
North	Burnt Oak, Colindale, Kingsbury	-500	1,600	200	100
East	Neasden	500	200	0	0
South East	Kilburn, Cricklewood, Willesden Green, Kensal Rise, Queen's Park	7,200	7,500	600	300
South	Harlesden, Church End	4,800	900	0	0
South West	Wembley, Ealing Road, Sudbury	1,800	6,100	-100	-300
Total	-	**14,900**	**15,100**	-	-

**We have included of the committed floorspace for the Wembley / Wembley Park area within the need figures for the Central sub-area, as this is where the majority of development sites are located. Need figures should be considered alongside those for the South West sub-area. Owing to the flexible consent granted to most permissions in this area, figures should be reviewed once commitments are implemented.*

2.23 The 'baseline' capacity forecasts set out above need to be considered alongside the qualitative needs to improve the retail and commercial leisure offer of the centres in the Borough. An absence or limited quantitative capacity does not necessarily mean there is not scope for the offer of centres to be improved, and the figures shown in Table 2.1 should not represent a ceiling to new development. New floorspace may enhance the profile of a town centre, helping to claw back expenditure, and increase market share and trade retention thus supporting a higher level of floorspace.

This is particularly the case in respect of the commercial leisure offer in the Borough's centres, which in many cases would benefit from enhancement and diversification to bring about increased dwell-time during the daytime and support enhanced early and late evening economies. Our assessment has also identified that there is a qualitative scope for the enhancement of other commercial leisure uses in the Borough, particularly in respect of cinemas, for which much of the Borough is currently poorly provided for.

London's Evolving Economy

2.24 London's economy is rapidly evolving, with strong economic growth transforming the way in which people, businesses and communities operate. As Central London becomes increasingly unaffordable and as the population continues to expand, many people and businesses are increasing settling beyond the centre. This move towards a polycentric (multi-centre) city provides opportunities to create a smarter, more intensive, affordable and attractive city, with town centres outside of the centre of London providing an important platform for creating a more sustainable city.

2.25 The London Plan highlights the role of London's town centres in supporting 'good growth', being hubs for a diverse range of uses, locations for mixed-use or housing-led intensification, and the main place for Londoner's sense of place and local identity. High streets have an integral role to play in the economic, social and environmental functioning of the city, and are the city's "most common public asset" (GLA High Streets for All), providing an opportunity to "serve a wide range of Londoners in diverse and inclusive ways".

Local Development and Intensification Trajectory

2.26 There is currently a strong policy focus across London on enhancing town centre vitality and viability and the role that population intensification and economic diversification can play in this. The draft new London Plan states: "London's town centre network is a vital element of London's economy...To continue to thrive they will need to evolve and diversify in response to current and future economic trends, technological advances, consumer behaviours, and the development of the 24-hour city. This need for adaptation and diversification, together with their good public transport accessibility, makes many town centres appropriate locations for residential-led or mixed-use high-density development".

2.27 Regeneration and intensification in Brent's town centres has an important role to play in:

- Supporting the overall economic, social and community vitality of the town centres and Brent's wider retail and leisure sector;
- Helping Brent to deliver against its Borough wide growth targets proposed by the Mayor in the draft new London Plan.

2.28 There is already a strong momentum in this regard, with a significant amount of regeneration and delivery already taking place across the borough. This has been particularly prominent around the Wembley Opportunity Area (including its Housing Zone), the ongoing South Kilburn regeneration programme, and the Alperton Housing Zone. Alongside this prominent activity already taking place within Brent, there has been substantial development taking place in neighbouring boroughs, including Cricklewood, Brent Cross, Old Oak & Park Royal Opportunity Area. Many of these are regionally significant regeneration programmes, which are taking place in or near Brent's town centres and have the potential to have a significant impact in terms of creating additional demand and in creating different types of demand on Brent's town centres.

2.29 Beyond these strategic opportunities, our research has highlighted that more local opportunities for intensification exist across the Borough's town centres. These range from site specific opportunities for redevelopment, to area wide opportunities for master-planning and regeneration. These are explored in detail in chapter 5 of the town centre health check report (Document B).

2.30 The Council has an important role to play as a facilitator and in some cases enabler for intensification. As such, it is important that the Council develops an agreed position on the opportunity which allows it to approach intensification in a consistent and coherent way.

2.31 In considering intensification it is imperative that the Council takes a co-ordinated approach, which marries spatial and financial considerations, with wider strategic, economic and social considerations. Crucially, intensification should not just be seen as a purely spatial process: it should be seen as an opportunity to support the evolution of a more diverse and resilient town centre economy, place and community.

3 | Borough-Wide Recommendations

3. Borough-wide recommendations

Introduction

3.1 In this section, we set out a series of Borough-wide / strategic objectives which the Council may wish to take forward in the development of policies for its new Local Plan and other future development plan documents. These are structured around the following key topics:

- Borough-wide planning policy recommendations
- Hierarchy of centres
- Town centre boundaries and frontages
- Review of existing development management policies
- Permitted development and the use of Article 4 Directions
- Town centre strategy management
- Town centre form and environment

3.2 The recommendations have been developed in direct response to the evidence and building upon a knowledge of the Council's wider policy aspirations and capacity to intervene. In making recommendations for the town centres, it is recognised that the Council has committed to focus its attention on 9 priority town centres, building on evidence showing that these are likely centres are likely to generate the greatest impacts from the Council's investment.

Borough-wide planning policy recommendations

- **B1 The Council should retain the core retail functions of its major, district and local centres.** This should include maintaining and regularly reviewing primary shopping frontages (PSFs) in town and district centres to ensure a critical mass of footfall-generating retailing activity, and defined PSFs should contain active frontages throughout. In this section, we set out a number of suggested amendments to primary and secondary frontages within the network of centres which the Council may wish to consider.
- **B2 The Council should seek to diversify the role of its town centres.** The Council should look to accommodate an increasing range of uses within secondary frontage within Brent's town centres, including community space, facilities and new types of housing, to help improve the sustainability of town centres in the long term. The Council should also work with local communities to identify potential sites that provide opportunities for testing innovative practices within housing, public space and community assets.
- **B3 The Council should support the delivery of new space for growth, and ensure a sufficient supply of sites to meet the full extent of the quantitative retail and class A3 and A4 needs identified.** The Council should work to bring forward overlooked sites and spaces that could be used to intensify the economic function of town centres. This includes a wide range of space that can be used to support the future economic evolution of Brent's town centres, including retail and leisure, more general employment space and workspace (including SME workspaces, artists spaces and maker spaces). The 'need' for new floorspace should not be compromised by limited site availability.
- **B4 The identification of sites to meet the retail and commercial leisure floorspace 'need' should be subject to the sequential test.** In accordance with the approach set out in the NPPF

(paragraphs 23-24), should be directed towards the Council's network of town, district and local shopping centres in the first instance, followed by appropriate and well-connected edge-of-centre sites. Floorspace should not be allocated to out-of-centre sites.

- **B5 The Council should explore options for the intensification of its out-of-centre retail warehousing/large format supermarkets.** The Borough has a significant amount of non-food retail warehousing and standalone large supermarkets, particularly to the north of the Borough. Reflecting the requirements of part (d) of Policy SD8 of the Draft London Plan, the Council should, through its new Local Plan, identify the potential of these locations to deliver housing intensification through redevelopment and ensuring these locations become more sustainable in transport terms.

  The importance of the retail floorspace and its contribution to meeting shopping needs should be fully considered as part of any redevelopment proposals. Proposals which involve the redevelopment of sites containing existing supermarkets should ensure that any site redevelopment incorporates replacement convenience goods floorspace of a comparable size (in terms of net sales area) to that which is being lost. This is to ensure that the sustainable patterns of convenience shopping in the Borough which this study has identified are not undermined.

- **B6 Planning applications for the development of retail, commercial leisure and other 'main town centre uses' (as defined by the NPPF) which are not within a defined centre will need to demonstrate compliance with the sequential and impact 'tests' set out at paragraphs 86-90 of the NPPF (as revised, 2018)**. Local authorities are directed to comply with the NPPF and the requirements of the sequential test. Local authorities should be proactive in presenting sites to developers as potential town centre development opportunities, which could include merging smaller units. The Council should work with applicants to identify sequentially preferable sites which should be considered through the sequential test.

- **B7 The quantitative retail and commercial leisure needs identified in this study should be subject to regular review throughout the Council's Local Plan period.** We advise that quantitative forecasts beyond 2028 are considered indicative because key inputs into the quantitative need assessment such as population, rates of online shopping and expenditure growth will invariably change. Expenditure forecasts are particularly susceptible to change as the implications of the UK's withdrawal from the EU on economic growth and consumer spending become more clear. Alongside this, patterns of shopping will continue to evolve, both as technologies change, and residents of the Borough respond to new retail and leisure developments planned within the Borough (e.g. at Wembley) and outside the Borough (e.g. at Brent Cross).

- **B8 Further development of the Brent workspace policy to support enterprise and innovation in town centres and to support local place-shaping aspirations.** Building on the recommendations made in the Brent Workspace Study, the council should continue to explore potential workspace locations in Brent's town centres to accommodate new different types of businesses and support sustainable economic growth.

  While the core focus for this is on employment (B Use Class) focused workspace typologies, consideration should also be given to the demand for flexibility and affordable spaces for retail, food and drink, creative and cultural consumption and community / third sector activities. While these are all activities which can contribute toward sense of place and local distinctiveness, potential for innovation and enterprise is increasingly constrained by competition for space and increasing costs.

  A broader workspace policy could include flexibilities to encourage meanwhile uses of vacant / disused spaces, along with commitments to provide permanent non-employment SME workspace where development is taking place in the PSF (i.e. where employment focused activities are less appropriate).

- **B9 The Borough should plan to meet identified visitor accommodation needs over the course of its new Local Plan period, and direct future provision to Wembley and Kilburn town centres.** The GLA has identified that Brent needs to plan for 2,622 net additional serviced accommodation rooms over the period 2015-40. It is recommended that future visitor accommodation needs are directed towards the two major town centres of Wembley and Kilburn, in order to assist in strengthening the role and function of these two locations as the highest-order centres in the Borough, and Wembley's role as an events/sporting destination.

  As set out at Policy DM6 of the Council's Development Management Policies, hotel/serviced accommodations are a 'main town centre use' and therefore should be directed towards town centres in the first instance. Applications for development outside defined centres will need to demonstrate compliance with the sequential test.

  Hotels and other visitor accommodation can make a positive contribution towards providing additional footfall and generating spend for other town centre businesses. They may make particularly suitable uses for upper levels of premises.

- **B10 The Council should implement a Night-Time Economy Strategy for the Borough.** The Mayor of London has placed significant importance on London's night time economy, recognising that it employs 725,000 people across the city, and that an entire 'ecosystem' of industries support the night time economy. The nature of many night time economy uses (e.g. late night bars, clubs, and associated uses such as takeaways and late night fast-food outlets) means that it is particularly important for a joined-up approach to the development of a strategy, including planning, licencing, culture, regeneration and community safety. The Night Time Economy Strategy should include an aspiration for both Kilburn and Wembley to be awarded Purple Flag Status.

- **B11 Applications for new Night Time Economy Uses should be directed towards the major town centres of Wembley and Kilburn.** These centres are the highest order centres in the Borough and as such the most appropriate locations for uses of this nature. Applications for development elsewhere in the Borough should be considered on individual merits, with particular consideration to amenity and safety.

Hierarchy of centres

3.3 The current hierarchy of centres in the Borough, as set out in the Draft London Plan (DLP), is summarised below. A number of the centres overlap with neighbouring Boroughs.

- **'Major' centres** - Wembley and Kilburn (Kilburn is split between Brent and Camden)
- **'District' centres -** Ealing Road, Harlesden, Neasden, Preston Road, Wembley Park, Willesden Green, Kingsbury (Brent/Harrow), Kenton (Brent/Harrow), Colindale/The Hyde (Brent/Barnet), Cricklewood (Brent/Barnet/Camden) and Burnt Oak (Brent/Barnet/Harrow).

3.4 In addition, the Borough has four local centres at Church End, Kensal Rise, Queen's Park and Sudbury. Documents A and B to this study have considered the role and function of the network of district, major and local centres, and their current performance.

3.5 Based on our assessment, we do not consider there to be a policy case for any changes to the Borough's hierarchy of centres at the present time, and the Borough's network of centres are all performing a role and function in line with the DLP definitions set out above. There is also no evidence to suggest that any of the centres should be de-designated from the Borough's hierarchy of centres.

3.6 Whilst it is acknowledged that the district centres vary considerably in their size (in terms of floorspace/number of units), turnover and role and function (e.g. some centres have a specialist shopping role), sub-dividing the district centres into two or more categories (e.g. 'major district' and 'district') would result in the Borough not having a retail hierarchy consistent with the DLP definitions shown above.

3.7 It is also acknowledged that some of the local centres – namely Queen's Park and to a lesser extent Kensal Rise – are strong-performing centres which are performing a heightened role in respect of their leisure/evening economy offer. However, it is considered that the size of the centres and the nature of their daytime retail offer as orientated towards meeting local needs means that on balance, their classification as local centres remains the most suitable. It is recommended that the classification of Church End and Sudbury as local centres also remains appropriate.

3.8 There is scope for future Local Plan reviews to consider the policy case of Wembley major centre to being upgraded to a Metropolitan Centre, although this will be subject to the 'committed' floorspace in the Wembley Park area coming forward, and significant improvements being made to the cohesiveness of the centre. This is discussed further in Section 4.

- **B12 The Borough's retail hierarchy should, for the purposes of its new Local Plan, remain unchanged.**

Town centre boundaries and frontages

3.9 The NPPF makes it clear that local planning authorities will need to have robust policies in place which define town centre boundaries, primary shopping areas, and primary and secondary shopping frontages. We draw attention to the following definitions set out at Annex 2 of the NPPF:

Town centre – *'Area defined on the local authority's proposal map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance.'*

Primary shopping area – *'Defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage'*

Primary and secondary shopping frontages – *'Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.'*

3.10 The Council's current Policies Map contains defined town centre boundaries for each of the major, district and local centres in the Borough. For each centre, it also defines Primary Shopping Frontage (PSF) and Secondary Shopping Frontage (SSF). However, the current Policies Map does not identify Primary Shopping Areas (PSAs) for any of the centres, and in order for the Council's development plan to be compliant with the NPPF there will be a need to define PSAs moving forward. As part of the development of our strategy for the Borough, we have recommended Primary Shopping Areas for each of the Borough's major, district and local centres. These are shown mapped at Appendix 1 to this Strategy & Recommendations Report.

- **B13 The Council should adopt Primary Shopping Areas for its network of major, district and local centres, in order for its approach to development management to be consistent with the NPPF, in line with the recommendations set out at Appendix 1 to this report.**

3.11 We have also reviewed the town centre boundaries as defined on the Policies Map and consider them to generally remain appropriate when considered against the NPPF definitions set out above. Should the committed development in the Wembley Park area come forward as expected, there is a potential case for future iterations of the Local Plan to combine the boundaries of Wembley town centre and Wembley Park district centre, in order to assist with the creation of a coherent offer and sense of place. This is discussed further in our sub-area recommendations in **Section 4**.

3.12 Elsewhere in the Borough, our only other recommended town centre boundary change is the extension of Kensal Rise local centre boundary to reflect the new leisure centre development coming forward at the southern end of the centre, and a contraction of the town centre boundary in Neasden to remove the small parade of units to the western side of the North Circular. These changes are shown mapped at Appendix 1.

3.13 In terms of PSF and SSF, we propose amendments to each of the centres in the Borough, with the exception of the district centres at Ealing Road and Kenton, and the local centre at Sudbury. These are set out in full in the table below, and also shown mapped at Appendix 1. In several centres – Colindale, Cricklewood, Kingsbury, Preston Road and Willesden Green, it is considered the current PSF allocations are overly extensive and not reflective of the wide mixture of uses which currently occupy the units within them – i.e. parts of the defined PSF we have identified in the table below contain a range of non-retail uses including cafes, restaurants, take-aways, hair & beauty / tanning salons, taxi offices and so on. It is therefore recommended that these areas are reclassified as SSF. These proposed reallocations are more reflective of the 'on the ground' situation, and allow the Council greater flexibility in assessing applications for change of use moving forwards.

3.14 It is important to note, however, that in each centre, it is recommended a core PSF is retained. This is considered vital in order to protect the core retail function of the centres, and ensure they remain destinations which can effectively service a range of day-to-day, and in the case of the major centres, more specialist shopping needs. With the exception of those centres listed above, we do not recommend any changes to the PSF which is currently defined on the Policies Map.

3.15 A number of Brent's centres are split between two authority areas. Our recommendations below refer solely to those parts of the centre which fall within LB Brent.

B14 Recommended changes to town centre boundaries and PSF/SSF.

	Town centre boundary	Frontages	Justification / comments
Major centres			
Wembley / Wembley Park	No change, but review during Local Plan period (see recommendations in Section 4)	No change, but review during Local Plan period (see recommendations in Section 4)	The existing PSF and SSF in Wembley town centre is considered robust and no immediate changes are recommended. However, frontages will need to be kept under review throughout the Plan period to take into account commitments such as the Montrose Avenue Car Park site, and the new development at the junction of High Road / Park Lane, and these sites will need to be allocated as PSF or SSF depending on the nature of

	Town centre boundary	Frontages	Justification / comments
			floorspace which comes forward. At present we do not consider there to be a policy case for including the LDO as PSF/SSF due to its detachment from the rest of the offer in the centre, but this should again be reviewed as committed floorspace in the nearby vicinity begins to come forward. Wembley Park district centre comprises two distinct concentrations of retail/town centre activity which do not benefit from strong linkages. Both have a sufficiently strong offer to form part of a combined PSA for Wembley Park, although it is recommended that PSF is restricted to the northern cluster only. The Council may wish to consider the merits of re-classifying these locations as two separate Local centres in the future – see recommendations in Section 4.
Kilburn	No change (LB Brent boundary)	No change	Town centre boundary is considered to be robust. PSF should be amended to omit the Gaumont State Cinema site; it is recommended that the PSF should be curtailed at junction of Kilburn High Road / Priory Park Road (southern side)
District centres			
Colindale / The Hyde	No change (LB Brent boundary)	PSF in LB Brent part of centre should all be allocated as SSF throughout	There is no critical mass of retail activity in the area currently defined as PSF, with a large number of non-retail uses occupying premises. None of the units are considered to require the tighter policy protection offered by PSF.

	Town centre boundary	Frontages	Justification / comments
Cricklewood	No change (LB Brent boundary)	The following areas of defined PSF should be reclassified as SSF: North of Ashford Road / Cricklewood Broadway junction (western side) South of 133 Cricklewood Broadway (inclusive) (western side)	There is no critical mass of retail activity in these areas, which are currently defined as PSF, with a large number of non-retail uses occupying premises. None of the units are considered to require the tighter policy protection offered by PSF.
Ealing Road	No change	No change	Ealing Road is a self-contained, clearly-defined centre and no changes to either the boundary or frontages are considered necessary.
Harlesden	No change	Extensions to SSF along Park Parade and High Street. These areas should form part of the town centre boundary but not the Primary Shopping Area	Park Parade and High Street both contain a range of retail and other main town centre uses which make a positive contribution to the overall mix of the centre. However, their more peripheral locations means that alternative uses could be supported if sites become available, without compromising the overall vitality and viability of the town centre, so it is considered these areas should be located outside the PSA.
Kenton	No change (LB Brent boundary)	No change	Should any redevelopment of the Sainsbury's store come forward, this should be retained as PSF.
Kingsbury	No change	PSF on north side of centre east of Berkeley Road should be converted to SSF. SSF on Berkeley Road should be removed.	Units on the north side of Kingsbury Road, east of Berkley Road junction, are occupied by a high number of non-retail uses with no anchor stores in fairly poor quality premises, and is considered more appropriate to classify as SSF. Small parade of units on Berkeley Road are of poor quality and, unless improved, do not require protection as their release for other uses

	Town centre boundary	Frontages	Justification / comments
			would not compromise the vitality and viability of the centre. Elsewhere in the centre, we do not consider there to be a policy case for extending the boundary / frontages to include the Iceland store or other premises in retail use on Honeypot Lane, as they are detached from the rest of the offer in the centre.
Neasden	Minor change	PSF should be contracted within the centre to include Tesco Express store and parade of units east to junction with Cairnfield Avenue only. SSF should be reviewed and updated if opportunity sites redeveloped for main town centre uses. SSF should be removed from Neasden Road North, and district centre boundary should be amended to reflect this.	Much of the PSF contains a wide range of uses which are more reflective of a SSF. It is considered that the more flexible designation of SSF is appropriate for the majority of the centre, whilst retaining a tighter PSF incorporating the Tesco Express store. There are two identified opportunity sites in the district centre; if redevelopment of these sites are progressed there may be a need to extend SSF. There is an area of defined SSF on Neasden Road North, which is detached from the rest of the centre. Both the retail units and the buildings as a whole (i.e. including the residential uses above) are of poor quality and represent a further potential development opportunity on a prominent site. The loss of these units from defined frontage would not, in our view, compromise the overall health of the centre.
Preston Road	No change	PSF should be Western side of Preston Road only, between junction with Preston Waye and up to an including the Tesco Express store.	Much of the area currently defined as PSF is occupied by a range of uses more akin to SSF, and the PSF is considered too extensive in its current form. A tighter PSF should be defined in order to retain and

	Town centre boundary	Frontages	Justification / comments
		Other areas currently defined as PSF to be redefined as SSF.	promote a critical mass of retailing activity within the district centre. The PSF should include the two supermarkets which act as 'anchor' stores in the centre.
Willesden Green	Minor amendment	Sainsbury's supermarket should be included in PSF (currently SSF). Walm Lane (excluding Lloyds Bank) (both sides) should be reclassified from PSF to SSF.	Minor amendment to town centre boundary to remove new residential development to rear of Willesden Library. Sainsbury's is the clear 'anchor' store to the town centre offer, and notwithstanding the fact it is set back from the High Road, it should be included within the PSF to protect its retail use and anchor role. The offer on Walm Lane is, for the most part, reflective of a secondary part of the centre, with a high number of retail services and take-aways, no anchor stores and a generally poorer quality offer.
Local centres			
Church End	No change	PSF throughout centre should be reclassified as SSF.	PSF throughout the centre contains a wide range of non-retail uses, including education centres, a cultural centre, a vetinary surgery and cafes and restaurants, with no coherent frontage in retail use.
Kensal Rise	Extension	Local centre boundary and SSF should be extended southwards along Chamberlayne Road to incorporate new leisure centre and units on western side of road (up to and including 4 Chamberlayne Road)	The parade of units on the western side of Chamerlayne Road make a positive contribution to the overall offer of the centre and are considered to form part of the SSF in the centre. The development of the leisure centre, once complete, will form a 'main town centre' use and the boundary of the centre should be extended to reflect this.

	Town centre boundary	Frontages	Justification / comments
Queen's Park	No change	Add M&S Foodhall, Salisbury Road to SSF	SSF should be updated to reflect recent opening of the M&S Foodhall south of Queen's Park station, on Salusbury Road. Its detachment from the rest of the offer in the centre means it should be not considered as PSF.
Sudbury	No change	No change	Although the units to the south of the railway line are poorly connected to the wider offer of the centre, they contain the only foodstore serving the centre (Tesco Express) and therefore, on balance, should be retained.

Review of existing development management policies

3.16 The Council's existing approach to controlling the range of uses which is permitted to come forward in defined primary and secondary frontages is set out at Policies DMP2 and DMP3 of the Council's Development Management Policies document (November 2016). Policy DMP2 states that:

Non-A1 or A2 uses will be permitted within town centres where (a) it would not reduce the proportion of frontage in A1 and A2 use to less than 65% of the primary shopping frontage; or (b) if the vacancy rates exceed 10% of primary frontage, it would not reduce the proportion of frontage in A1 and A2 use to less than 50%l and (c) the proposal provides, or maintains, an active frontage.

Unviable secondary frontage on the periphery of town centres will be acceptable for residential development.

3.17 It Is considered that the following changes are made to the wording of Policy DMP2 as part of any future review of the policy:

- **B15 The Council should not permit any further class A4 or A5 use in its defined primary shopping frontages (as amended under recommendation B12). This** is in order for the primary shopping frontage to have a clearly-defined retail role and ensure centre can meet day-to-day shopping.
- **B16 The wording of Policy DMP2 should be clarified to clearly define those parts of the centre where residential development will be acceptable. It** is considered the phase 'periphery of town centres' should be amended to refer to those parts of the secondary shopping frontage which fall outside the defined Primary Shopping Areas which the Council will need to define for each of its centres.

3.18 Policy DMP2 also sets an impact assessment threshold of 500 sq.m gross, stating that proposals for new retail floorspace which are above this threshold and outside of defined town centres should be accompanied by a retail impact assessment.

- **B17 It is recommended that the retail impact assessment threshold of 500 sq.m is retained, however in order to be consistent with paragraph 26 of the NPPF this requirement should also be extended to cover leisure uses.**

3.19 Policy DMP3 controls the concentrations of betting shops, adult gaming centres, pawnbrokers, takeaways and shisha cafes which can come forward in the Borough's centres

- **B18 Policy DMP3 should be retained, as it provides a strong basis on which to control lower-quality uses in the centres, and the town centre frontages.** It is recommended that Policy DMP3 is amended to prevent the development of any class A5 use within primary shopping frontage. This is in order to protect the vitality and viability of the centres which have defined primary shopping frontage, and to ensure they retain a strong retail core.

The role of retail, Permitted Development & the use of Article 4 Directions

The role of retail in the Borough's centres

3.20 Retail continues to remain a vitally important footfall driver in centres, and the main reason that residents are visiting town centres. A retail offer which mixes representation from national multiple retailers which act as 'anchors' and specialist independents which provide diversity is important to attracting footfall, and we expect this to continue over the course of the Council's new Local Plan period.

3.21 Document A of this study has identified that, at the national level, whilst town centres are undoubtedly going through a period of transition, successful centres continue to be supported by retail. New retail trends such as 'click & collect' rely on physical retail outlets to be successful; evidence suggests that click & collect generates additional spend from 39% of customers, benefiting overall town centre turnover. Data from Mintel suggests that for clothing & footwear sales, which has been a particularly successful form of online shopping, 85% of customers continue to visit a mixture of 'high street' and online outlets to undertake their shopping.

3.22 Meanwhile, changes in the convenience goods sector over the past decade have seen a growth in smaller-format convenience goods supermarkets in high footfall locations such as town centres and close to public transport links. These retailers are important footfall drivers, and in a number of Brent's centres (particularly district and local centres) can act as important 'anchors' – Aldi, Sainsbury's and M&S in Kilburn; Co-Op/Tesco Express in Preston Road; and Tesco Express in Neasden are all examples of this.

3.23 The continued importance of retailing in underpinning the vitality and viability of the Borough's network of centres is also borne out by the findings of the household telephone survey undertaken in support of the study. In total, Brent's network of town, district and local centres attract £647m of spending from residents in the survey area - £348m of which is spent on comparison (non-food) goods and £299m of which is spent on convenience (food) goods. These figures confirm the vital role which retail plays in supporting the overall health of the Borough's town centres. The above-cited figures do not take into account 'linked trips' spend which is likely to take place to non-A1 outlets in the centres by customers at the same time, such as to cafes, bars, or retail services such as hair & beauty, for example.

3.24 If there was a significant shift away from A1 retail in Brent's major and district centres, the reasons for visiting the centre would fall and potentially erode footfall, dwell time, frequency of visit, and turnover, with potential implications for the wider vitality and viability of centres. We have recommended policy amendments to frontages in a number of Borough's centres to allow for a greater degree of flexibility, reflecting current market trends, however class A1 use in defined primary shopping frontages is still crucial as a footfall driver. The health of higher-order centres cannot be retained with an over-concentration and dominance of non-A1 retail uses such as coffee shops, bars and take-aways.

Permitted Development Rights

3.25 An important change since the Council's previous retail evidence base study is the introduction of Permitted Development Rights covering class A1 retail units, meaning that they can now be converted to other uses without the need for planning permission. Specifically, the Permitted Development Rights made permanent on 15th April 2016 allow for the conversion of class A1 retail shop units to the following uses:

- Class A2 (financial and professional services);
- Up to 150 sq.m class A3 (restaurants and cafes), subject to prior approval;
- Up to 200 sq.m class D2 (assembly and leisure), subject to prior approval and if the premises were in class A1 use at 5th December 2013;
- Class C3 (dwellinghouses), if the cumulative floorspace of the building is under 150 sq.m and subject to prior approval.

Article 4 Directions

3.26 Councils have the power to remove national permitted development rights under what is known as an 'Article 4 Direction'. Article 4 (1) of the Town and Country Planning (General Permitted Development) (England) Order 2015 states that a Council when making a direction must be satisfied that it is expedient that development that would normally benefit from permitted development rights should not be carried out unless a planning permission is granted. Paragraph 200 of the NPPF states that the use of Article 4 directions to remove national permitted development rights should be 'limited to situations where this is necessary to protect local amenity or the wellbeing of an area'. Paragraph 038 of the Planning Practice Guidance states that in deciding whether an Article 4 direction would be appropriate, Councils should identify clearly the potential harm that the direction is intended to address.

3.27 We are aware of a number of local planning authorities that have introduced Article 4 directions covering their network of town centres as a mechanism of protecting the retail function of their centres and protecting their overall vitality and viability. The removal of permitted development rights ensures that any applications for changes of use within defined Article 4 areas are assessed against the Council's development plan.

3.28 Whilst this study has demonstrated that the Borough's network of centres are currently healthy, there is a need to ensure they remain strong centres which meet a full range of local residents' day-to-day shopping (and in the case of the Major centres, more specialist shopping) needs. The vitality and viability of centres is dependent on providing a critical mass of quality, footfall-generating retail and leisure uses, and the application of appropriate Article 4 directions will ensure that the Borough's network of centres continue to function as healthy centres over the new Plan period.

- **B19 The Council should seek to apply Article 4 directions to all defined Primary Shopping Areas across its network of major, district and local centres.** This is in order to protect the vitality and viability of the Borough's network of centres over the Plan period. This approach will also protect the role and function of primary and secondary shopping frontage but will allow a more flexible approach, including permitting change of use to residential, in secondary shopping frontage which falls outside of the newly-defined Primary Shopping Areas
- **B20 The Council should protect employment space through the use of Article 4 Designations**. The Council should look to protect important employment space in town centres from the threat of permitted development rights, and develop Article 4 designations around

strategically important town centre employment locations to ensure the security of space for the future.

Town Centre Strategy and Management

3.29 Key to ensuring that Brent's town centres are able to adapt and thrive in the future is ensuring there is a strong strategy in place which supports the development of a strong, resilient and diverse set of town centres. Recommended areas of focus include:

- **B21 Develop a clear town centre investment and growth strategy.** Town centre strategy going forward should focus around the nine priority town centres (Wembley High Road, Ealing Road, Harlesden, Willesden, Neasden, Church End, Kilburn High Road, Colindale/ The Hyde, and Burnt Oak) already identified by Brent Council as having the highest potential, with targeted interventions in each of these town centres likely to yield the greatest benefits.
- **B22 Develop a clear (internal) action plan to guide the work of the town centre managers.** Continue efforts to support the activities undertaken by town centre managers in order to help support the development of networks in town centres, which can provide a platform for the delivery of future projects
- **B23 Work to strengthen business partnerships and networks within the town centres to build town centre management capacity.** Aim to build the capacity of local partnerships by continuing to provide Council support (through town centre managers). In building stronger local partnerships, this will aid the development of BIDs, business networks and the wider community in the future, and help to bring key actors from the resident and business community around the table.
- **B24 Encourage local residents to engage in the future planning of the Borough's network of centres.** Residents, businesses and community groups should be engaged to influence the future development of the Borough's centres. This should include capturing views of local residents and businesses in support of the development of a vision and strategic objectives for the centres in the Borough, as part of the Council's new Local Plan, and supporting the development of neighbourhood plans where appetite arises.

Town Centre Form and Environment

3.30 Enhancing the town centre form and environment will ensure that Brent town centres' are places where people want to live and work. Primary research has identified challenges on the ground in terms of the appearance and operation of town centres, with town centre users seeking improvements to the public realm, reductions in level of congestion and better transport connections. Recommended areas of focus include:

- **B25 Multi-departmental approach to town centre management**. Ensure there is a multi-departmental approach within LB Brent to allow close co-ordination on all issues affecting town centres. This includes planning, education, highways, environment and regeneration departments, in which overlaps exist in service delivery.
- **B26 Continue to work closely with external partners on a theme by theme basis to respond specific town centre challenges. T**he town centre health check research (and associated Commonplace survey work) has identified a broad range of challenges facing Brent's town centre. The response to some of these challenges (such as fly-tipping, anti-social behaviour, congestion, accessibility and community integration) will require close partnership working with external partners, including local Safer Neighbourhoods teams, community leaders / groups, and strategic partners (such as TfL).

Partnership working is required on a town centre by town centre and theme by theme basis to ensure that response is tailored and locally specific. Ongoing monitoring of town centre challenges by the team of town centre managers (in dialogue with local businesses and communities) will help to ensure a dynamic and proactive response.

- **B27 Work alongside neighbouring boroughs to improve co-operation in those town centres shared with other boroughs.** Six of Brent's town centres currently share a border with neighbouring boroughs (Harrow, Barnet and Camden). LB Brent should encourage cross-borough working where possible to improve the environment of each town centre (e.g. collaboration on litter collections, street cleaning, roadworks etc).
- **B28 Continue to seek improvements in the quality of the town centre environment.** In recent years, Brent has secured improvements to the public realm and wider high street environment in a number of town centres across the Borough. Such investment has been proven to have a positive impact in terms of local identity and reputation, and footfall. The Borough should continue to seek opportunities to deliver such enhancements, with a focus on streetscape, gateways and entry points to town centres and wayfinding.

  While enhancements would be beneficial across much of the town centre network, the immediate focus should be on the nine priority centres. Brent should continue to work with external partners such as the GLA and TfL to secure funding to deliver capital investments (e.g. via the Good Growth Fund).
- **B29 Protect and promote the unique heritage of Brent's town centres.** Work to protect and promote the unique heritage of some of Brent's town centres, which provide a distinct environment and add to their offer. Ensure that future development within town centres helps to protect, enhance or complement heritage assets.

Town Centre Vitality and Diversity

3.31 It will be key that Brent's town centres continue to be dynamic places, which they reflect the existing population living locally and meet the needs of the future population. Ensuring town centres continue to be vibrant and exciting places for local people is important. Recommended areas of focus include:

- **B30 Work to promote Brent's town centres more widely**. Look to improve the perceptions and identity of Brent's town centres through a programme of positive marketing and/or branding campaigns. Ensure that these have their roots in the local community, and that this builds on local networks (e.g. BIDs, business groups).
- **B31 Encourage local spending by Brent's residents.** Explore campaigns which encourage people to spend locally, especially amongst those moving into new communities/developments. Look to work with local businesses to make them more aware of local supply chains that they can utilise, helping to support the development of Brent's businesses.
- **B32 Work to embed culture within local communities, building on the momentum of the Borough of Culture.** Embed and celebrate culture within Brent's town centres, especially in the build up to Brent's Borough of Culture Year in 2020. Use culture as a tool to breaking down barriers between communities and increasing awareness of the opportunities and facilities available within Brent's town centres.
- **B33 Develop a programme of events in town centres.** Encourage the development of events across Brent's town centres, acting as a tool for increasing community engagement and participation. This should look to build on those events held as part of Brent's Borough of Culture Year, including street markets, fun fairs, music events and food festivals.

- **B34 Look to establish meanwhile spaces and 'test spaces'.** As part of efforts to support enterprise and innovation in Brent's town centres (see **recommendation B8),** work with landlords, developers and the Council's property team to develop meanwhile spaces which provide a platform for newly established businesses to access affordable, secure and flexible space. This includes developing spaces which have shared facilities available for tenants, providing them with equipment they may be unable to afford otherwise. Look to establish pop up shops which can provide a testbed for businesses looking to sell their products without the risk involved in renting a retail unit. Look for opportunities (particularly within Council-owned spaces) where Good Growth Funding could unlock appropriate spaces and deliver them. The use of long-standing vacant units, particularly outside of defined primary shopping frontage, could also be explored for these purposes.
- **B35 Help develop stronger local businesses through business support.** Develop more and better-quality businesses within Brent by helping existing businesses to survive, adapt and grow. In addition to helping those businesses already established within Brent, the Council should look to support local residents to set up new businesses and encouraging new higher value businesses and jobs to the area. The provision of business support should focus around several key themes:
    - Improving the appearance of retail units. Assist businesses in making their offer more appealing to perspective customers and helping businesses to improve their shopfronts and provide more visual merchandising.
    - Helping business to benefit from the Brent's evolving population – making businesses aware of local opportunities to benefit from new communities developing across the borough
    - Future proofing businesses – ensure that businesses are able to evolve and meet the increasing opportunities available online. The Digital High Streets programme should be continued to help boost the digital skills of businesses to ensure that all businesses are able to take advantage of online opportunities.
- **B36 Embed responsible business practices within local businesses.** Work with local businesses to educate and embed responsible business practices. This includes the promotion of the London Living Wage and ensuring that relevant licencing and health & safety measures at adhered to.
- **B37 Establish an agents forum to improve the Council's understanding of the development market.** Work with local agents to get a better sense on supply and demand for space on the ground, and understand some of the recurring challenges facing freeholders etc. In establishing an agents forum, this will act as a platform to build on agents' capacity to influence development and will help the Council to gain a more in-depth understanding of future opportunities and threats to town centres.
- **B38 Work alongside local workspaces to understand development and support needs.** Work with local workspaces to understand their existing and current space needs, and to help support their development. By helping to support spaces for enterprise, this will facilitate new ideas and experimentation within local businesses and generate creative, innovative and interesting start ups within Brent.
- **B39 When larger-scale commercial development is coming forward, ensure it meets the needs of Brent's businesses.** Where larger scale space is coming forward the Council should work with a formal operator, or ensure that sector testing has been undertaken, so that the space meets the needs of Brent's current and targeted sectors.

Inspiration

- **Entry Level Retail Units:** Collective, Camden. A pop-up shop programme using Camden Town's vacant premises, to host local businesses. The programme includes a local discount card scheme with over 100 local businesses. The programme aims to improve the quality of retailers on the high street, running temporary shops in vacant units before returning to market for sale.
- **Start-up incubator space:** Kitchenette, London. A food start-up incubator, focusing on street food and pop-up residencies as entry point for new food businesses. Kitchenette offers a year-long food entrepreneur support programme, including mentoring from industry experts and opportunities to take up residencies across various sites in London
- **Shared facilities:** Maida Hill Place, London. A kitchen and restaurant space designed to support food entrepreneurs. The facility supports businesses in their start-up phase, hosting cookery tuition and production businesses and running pop-up restaurants. The project is run as a social enterprise, with space for hire for food production, film hire and meetings.

Growth and Development

3.32 Brent's town centres are rapidly evolving areas, with large amounts of development set to occur both within and immediately outside the borough's boundary. LB Brent should maintain a proactive approach to defining and shaping delivery, through both direct and indirect channels, and help to integrate new development into the existing town centres. In addition, opportunities for intensification will exist across all of Brent's town centres albeit varying significantly in their scale and nature. LB Brent has an important role to play in helping to realise and shape these opportunities, in line with wider strategic aspirations. This will require a cross Council approach, including:

- **B40 Defining an intensification strategy for Brent's town centres.** The Brent Town Centre Health Check report provides an initial scoping of the types of intensification opportunities which exist in Brent's town centres. The research, which focuses on 6 of Brent's priority centres, highlights that a broad range of opportunities exist to intensify use of space in the town centres: these range from the re-use of vacant buildings, to the infill of small sites, and to larger scale redevelopment / regeneration projects.

  In the context of increasing policy pressure to deliver more homes and commercial space across the Borough, Brent should build upon this initial scoping research to define a clear intensification strategy for Brent's town centres. This should set out clearly the types of intensification being sought in each town centre (and the specific opportunities), and a clear framework for achieving this. In many cases, intensification will be delivered by the private sector (with the council helping to facilitate and influence delivery) through the planning system; in other cases (such as where there are public sector land ownerships or a rationale for the council to play a role in assembling sites), more direct intervention by the council might be required (see **recommendation B42** below).
- **B41 Working collaboratively with land owners to shape development aspirations.** Continue to work proactively with private land owners to understand and shape aspirations and where appropriate facilitate delivery. Identifying and engaging with key landowners in each town centre (and for key opportunity sites) will ensure the council is able to communicate its intensification strategy and aspirations and play a more direct role in influencing delivery.
- **B42 Exploring the potential for the Council to play a more active / direct role to secure delivery.** While in many cases, intensification of sites will be led by the private sector, as noted

above, in some cases there may be a rationale for the council to intervene more directly. There are a range of ways in which the council could intervene, including:

- Using its planning policy powers to directly enable and shape delivery
- Using its own sites to deliver demonstrator projects (e.g. piloting mixed typology uses which have not typically been delivered by the market)
- Acquiring / assembling land to bring forward delivery on difficult / fragmented sites
- Exploring provision of new delivery models to enable joint partnership working with private sector.

As part of its intensification strategy, the council should consider the role that it wishes to play in delivery, and from this, the types of delivery models and approaches it wishes to explore further. In all cases, a strong rationale will be required to demonstrate the case for public sector intervention, and that this will deliver social, economic, strategic and financial benefits

Local Benefit

3.33 Ensuring all members of the community are able to benefit from future development within Brent's town centres is important and is fundamental in helping Brent's more disadvantaged communities to be able to access future opportunities. Those managing Brent's town centres should work in partnership with the Council's skills and employment team to ensure that those needing support are aware of the opportunities available and know how to access it. Key activities which will help to ensure that local communities can participate, and benefit include:

- **B43 Improve the awareness of skills and employment opportunities.** Signpost residents and workers towards skills and employment opportunities for Brent's residents, ensuring that people are aware of available programmes and support taking place in the borough.
- **B44 Develop skills programmes around emerging opportunities.** Focus skills programmes on developing the skills needed in Brent's emerging sectors, including the creative and digital sectors.
- **B45 Increase youth engagement in town centres.** Ensure that young people are engaged with activities within their local town centres. Work with local schools and colleges to increase participation in activities in high streets, such as helping young people gain work experience locally and volunteering at local events.
- **B46 Work to upskill the current town centre workforce.** Support Brent's current town centre workforce and deliver and support opportunities to develop their skills (e.g. management and training for those working in the retail sector).

Inspiration

- **Engaging young people:** Teenage Market, UK wide. A free platform for young people to run their own stall at their local market and test product and business ideas. Markets also focus on promoting young local performers by providing performance platforms at markets. The scheme builds connections between young traders and established independent retailers.
- **High street sector focused training:** Open Kitchen, Hackney. A training restaurant for Hackney Community College operating as a restaurant and cookery class venue. Open Kitchen boasts two state of-the-art kitchens, equipped with the latest industrial equipment. Students take an active role in promoting their culture and passion for food and assist all courses offered at the kitchen.
- **Skills programmes around emerging opportunities:** Industry in the Streets, across London. A creative youth agency that works with young people and practitioners in creative industries. IITS develops

projects ranging from live events to seminars and marketing campaigns for brands, education providers and arts organisations, promoting ethical enterprise, education and youth engagement in the creative sector.

Monitoring and Evaluation

3.34 Brent's town centres and economy are constantly evolving, especially with the high levels of development expected in the borough in the near future. To ensure strategic and investment are made with the best information available, a programme on monitoring and evaluation should be undertaken on Brent's town centres, with key priorities including:

- **B47 Continue updating evidence on town centre performance:** ensure evidence is kept up-to-date, with statistics and 'live' evidence from the ground supporting LB Brent's future decision making processes. Use the Commonplace resource to build a better picture of town centre users' perspectives and track the sentiment towards town centres over time.
- **B48 Monitor progress:** take stock on an annual basis to review the progress made and reset priorities.

4 |
Sub-area recommendations

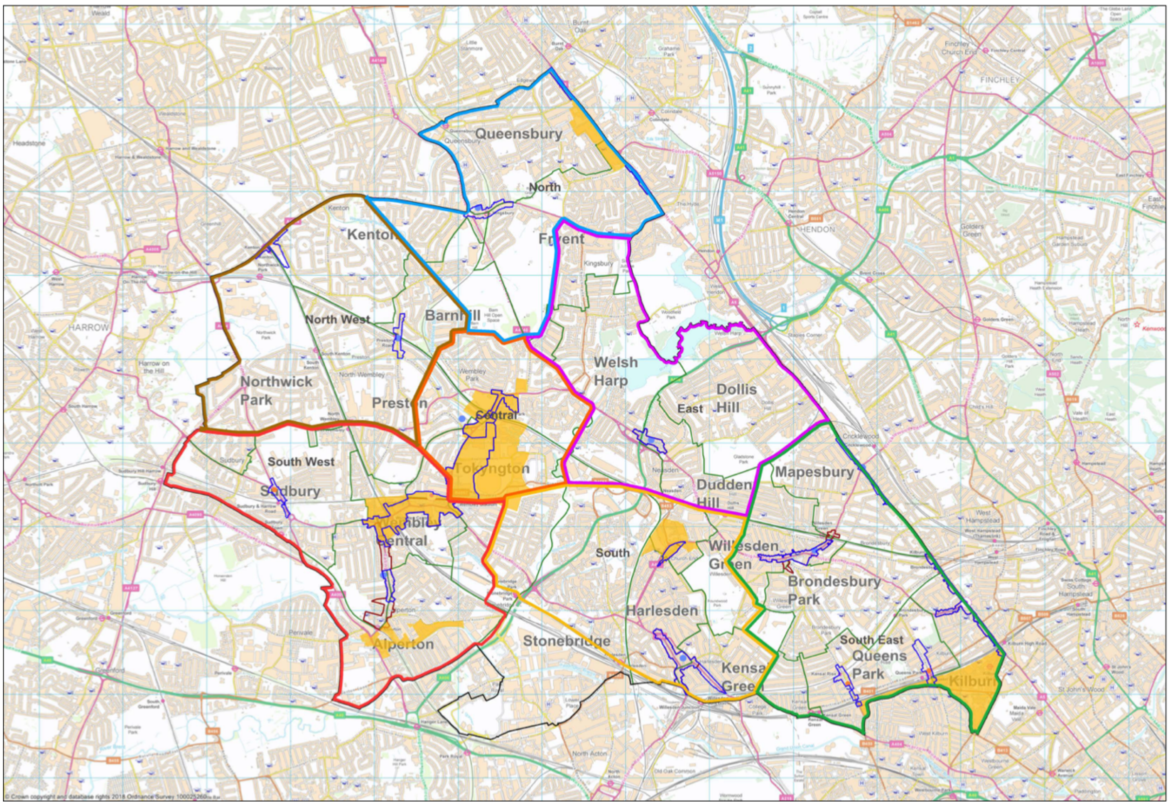
4. Sub-area recommendations

4.1 Having identified the Borough-wide recommendations in the previous section, in this section we set out policy recommendations at the local level. Reflecting the approach which will be taken by the Council in developing strategies for the different parts of the Borough in the preparation of their replacement Local Plan, we have set out our recommendations on the basis of the following seven sub-areas:

- **Central Brent** – Wembley Park (district centre)
- **North West Brent** – Kenton (district centre), Preston Road (district centre)
- **North Brent** – Burnt Oak (district centre), Colindale (district centre), Kingsbury (district centre)
- **East Brent** – Neasden (district centre)
- **South East Brent** – Kilburn (major centre), Cricklewood (district centre), Willesden Green (district centre), Kensal Rise (local centre), Queen's Park (local centre)
- **South Brent** – Harlesden (district centre), Church End (local centre)
- **South West Brent** – Wembley (major centre), Ealing Road (district centre), Sudbury (local centre)

4.2 A plan showing the sub-areas (alongside defined town centre boundaries) is shown at **Figure 4.1.**

Figure 4.1 | Brent sub-areas



Source: Brent Council

Central Brent sub-area recommendations (Wembley Park) and South West Brent sub-area recommendations (Wembley, Sudbury & Ealing Road)

4.3 Both the Central and South West Brent sub-areas cover the Wembley area. The primary and secondary shopping frontage of Wembley town centre falls within the South West Brent sub-area, alongside the district centre of Ealing Road and the local centre of Sudbury. However, the overall boundary of Wembley town centre extends into the Central Brent sub-area, which also includes Wembley Park district centre. The majority of the 'committed' floorspace for new retail and other 'main town centre' uses falls within the Central Brent sub-area.

4.4 It is considered that a co-ordinated approach to the future development of Wembley is necessary to ensure the existing town centre benefits from the new development which is coming forward to a greater extent than is currently taking place. We therefore have combined our strategic recommendations for the two sub-areas in order to assist the Council in developing a co-ordinated strategy for Wembley town centre.

4.5 Wembley has great potential to develop, with high levels of population growth expected over the next few years, ambitions to become a regionally significant destination and building on its iconic reputation with the Euro 2020 finals taking place at the stadium. However, it is not maximising the potential benefits that could be generated from the opportunities available. Evidence suggests that despite recent investment and growth in Wembley over the last few years, its share of the borough's spend has been falling, and there are concerns that match days are reducing town centre shopping visits (especially following Tottenham Hotspur's temporary relocation to Wembley).

<u>Wembley major town centre</u>

- **CSWB1 The retail function of Wembley town centre should be protected and enhanced**. This should be achieved through the retention of robust policing defining acceptable uses in primary and secondary shopping areas, as defined by Annex 2 of the NPPF. Such an approach will ensure a 'critical mass' of retail floorspace will be retained in the centre, reinforcing its role and function as a Major centre. Frontages should be reviewed at regular intervals to ensure they remain fit for purpose and reflective of the retail and wider main town centre uses offer.

- **CSWB2 The Council should respond positively to applications to improve the quality of existing floorspace stock in primary and secondary shopping areas.** This includes amalgamation of units to provide modern floorspace which may assist in attracting higher-profile operators to the centre, supporting Wembley's role and function as a Major town centre. There is a need for the primary and secondary shopping areas in Wembley to uplift their performance and provide a more compelling offer in light the strong competition it faces for spending, particularly in relation to comparison goods, and the provision of modern, quality floorspace will assist with this.

<u>Retail and commercial leisure needs</u>

- **CSWB3 The Council should plan for the development of 12,000 sq.m net comparison goods floorspace in the Wembley area over the period to 2028.** This is a combined need for the Central sub-area (6,700 sq.m net by 2028) and South West sub-area (5,300 sq.m net by 2028). It is recommended that this floorspace need should be directed towards sites in Wembley, in order to support its role as a Major centre.

- **CSWB4 The Council should plan for the development of up to 6,100 sq.m convenience goods floorspace in the South West Brent Sub-area.** It is recommended that this is directed towards the Wembley and Wembley Park areas. This is in order to alleviate the over-trading of existing foodstores currently taking place in the area, which will be further exacerbated following the redevelopment of the Stadium Retail Park site and the loss of the Lidl store on this site. It is recommended that as part of the overall identified need for the sub-area, at least one foodstore of between 1,000 and 2,000 sq.m (net) is provided.

- **CSWB5 The Council should seek to plan for additional class A3 and A4 floorspace in Wembley town centre.** Although a limited quantitative need for additional provision is identified (400 sq.m class A3 by 2028, with no requirement for class A4), it is considered there is a qualitative need for additional provision of this nature, particularly in secondary shopping frontage areas in Wembley town centre, to help diversify the range of uses in the centre and support the development of an evening economy in this part of the centre. The quantitative requirements for A3/A4 floorspace should also be reviewed following implementation of the 'committed' floorspace.
- **CSWB6 Applications which seek to enhance and diversify the cultural, commercial leisure and night-time economy offer of Wembley should be considered positively, subject to being of an appropriate scale and amenity considerations.** In particular, there is scope for Wembley to accommodate 'family entertainment' and sports facilities such as bowling, climbing walls, and so on. These type of activities are a good fit with the existing offer of the centre and would potentially enhance Wembley's catchment, particularly if other improvements to the leisure and cultural offer of the centre are forthcoming. The enhancement of the night-time economy (i.e. late night bars/nightclubs) should be subject to issues relating to amenity, licencing and public safety being satisfied.
- **CSWB7 The Council should, through discussions with operators, explore market appetite for an independent cinema in the west / north of the Borough.** Given the significant growth expected to come forward in Wembley, and the absence of any independent cinema facilities in this part of the Borough, it is considered that Wembley should be the preferred location for such a facility, which would support its role and function as a Major centre, enhance its evening economy, and potentially attract new visitors to the centre from a wider catchment.

Integrating Wembley

- **CSWB8 The Council should work with relevant partners to ensure that the existing primary and secondary shopping frontage in Wembley town centre is fully integrated with recent and planned new retail and commercial leisure floorspace.** Wembley has a number of elements which, when combined, make for a compelling town centre offer: these include a 'day to day' shopping offer on Wembley High Road; the London Designer Outlet; the forthcoming Boxpark development; and civic and leisure functions. However currently the different components of the centre are poorly related to one another, and there is a need to better link these elements of the centre in order for the overall performance of the centre as a whole to improve.
- **CSWB9 A consistent approach to public realm, wayfinding and landscaping is vital to the delivery of a 'unified' town centre.** The town centre presently feels divided between the 'historic'' town centre (Wembley High Road) and 'new' town centre (LDO/civic offices), and investment in wayfinding and public realm would assist in overcoming this. Such an approach should be applied from the western end of Wembley town centre (Ealing Road/High Road junctions), through Wembley Central, up to and including Wembley Park station. The implementation of high quality pedestrian crossing facilities at the High Road / Engineers Way and High Road / Park Lane junctions is considered to be of particular importance.
- **CSWB8 Active frontages should, where possible, be incorporated into all new developments on the principle pedestrian route from Wembley Park station to the primary shopping area**

in Wembley town centre. This will help to integrate the different elements which presently combine Wembley town centre and drive footfall throughout the centre.

- **CSWB9 The Council should make full use of 'meanwhile' uses and events to help 'knit together' the town centre and encourage footfall between the primary and secondary shopping areas and the rest of the town centre.** A particular opportunity here is the introduction of a programme of markets, of which there is currently limited representation in the Borough. Other seasonal/temporary uses should also be explored.

Monitoring and hierarchy

- **CSWB10 Wembley should retain its classification as a Major Town Centre for the purposes of the Council's new Local Plan.** Wembley continues to perform a role as a 'higher order' Major centre, when assessed against the criteria set out at Annex 1 to the Draft London Plan[1].
- **CSWB11 The Council should aspire for Wembley to be upgraded to Metropolitan status in future iterations of the London Plan.** Based on the current mix, scale and performance and our understanding of future planned investment, there is potential for Wembley to take a step-change upwards and seek potential reclassification as a Metropolitan Centre[2]. It is considered that any future reclassification will depend on:
  - The quantum of 'committed' floorspace which is ultimately implemented in the town centre;
  - Improvements to the comparison goods retail offer being delivered; and
  - the ability for the different components of the centre to be fully integrated (see 'Integrating Wembley' recommendations, above).
- **CSWB12 The defined boundaries of Wembley major town centre and Wembley Park district centre should remain distinct over the next Plan period, but this should be subject to review.** Further development at Wembley, including the implementation of the identified 'commitments', is likely to extend the boundary of the retail and commercial offer of Wembley further north-east towards Wembley Park, which could potentially incorporate new primary or secondary shopping frontage. Should this materialise, and the recommended improvements to the connectivity of the area (as listed above) come forward, there may be a case for a combined centre to be defined through policy. Should the scope for an integrated centre (Wembley/Wembley Park) not arise, the Council may wish to consider defining the two distinct areas of retail/town centres which currently form Wembley Park district centre as separate local centres, owing to the lack of integration between the two parts of the centre.

Wembley Stadium mitigation

- **CSWB13 The Council should work with Wembley Stadium and local partners to explore ways to mitigate adverse impacts of match days (e.g. marketing Wembley town centre on emails and tickets sent out to visitors).** This could include exploring bespoke support for retailers to help them capture passing trade on match days; wider branding and marketing of the town centre more generally to challenge negative perceptions of the town centre arising from matchdays; and consideration development of separate retail strategy for Wembley, which focuses on supporting the retail economy of the area

[1] The Draft London Plan (2017) defines 'Major' centres as generally containing 'over 50,000 sq.m of retail, leisure and service floorspace, with a relatively high proportion of comparison goods relative to convenience goods. They may also have significant employment, leisure, service and civic functions'.
[2] The Draft London Plan defines 'Metropolitan' centres as containing 'at least 100,000 sq.m of retail, leisure and service floorspace, with a significant proportion of higher-order comparison goods retail relative to convenience goods. These centres generally have very good accessibility and significant employment, service and leisure functions. Many have important clusters of civic, public and historic buildings'.

The role and function of Ealing Road district centre

- **CSWB14 The Council should not plan for any additional comparison or convenience goods provision within or on the edge of the Ealing Road district centre.** However, applications which seek to enhance existing provision and strengthen the role and function of the centre should be supported, providing they are of a scale appropriate to the role and function of the centre.
- **CSWB15 The Council should continue to support and enhance the specialist shopping role of Ealing Road district centre.** This could include, for example, stronger 'place marketing', for example promoting the centre to visitors and shoppers in Wembley town centre, given the close functional relationship between the two.

North West Brent sub-area recommendations (Kenton & Preston Road)

- **NWB1 The Council should plan for the development of up to 900 sq.m net comparison goods floorspace, up to 500 sq.m net convenience goods floorspace, up to 300 sq.m class A3 floorspace and up to 100 sq.m class A4 floorspace over the period to 2028.**
- **NWB2 Applications for convenience goods floorspace over and above the 500 sq.m net identified need should be considered favourably, providing they are of an appropriate scale.** There is a qualitative argument for an enhanced level of convenience goods provision in this sub-area, over and above the identified quantitative requirements. This is owing to the lack of consumer choice in this sub-area, and the over-trading of existing floorspace in both centres. Any applications not within a defined centre should demonstrate compliance with the sequential and impact tests.
- **NWB3 The Council should continue to seek the redevelopment of the Sainsbury's site in Kenton as an opportunity site.** The site's location next to Kenton Underground station offers opportunity for intensification to support a mixed use scheme, incorporating residential uses. Any redevelopment of the site should include a replacement foodstore of a comparable size to the existing Sainsbury's store, as this is the only large-format supermarket serving the sub-area and is trading well. As the 'anchor store' to the centre, there is opportunity for a replacement foodstore to make a stronger contribution to the wider vitality and viability of Kenton district centre by having the store entrance fronting onto Kenton Road.

North Brent sub-area recommendations (Burnt Oak, Colindale & Kingsbury)

- **NB1 The Council should plan for the development of up to 4,400 sq.m net comparison goods floorspace, up to 3,600 sq.m net convenience goods floorspace, up to 500 sq.m class A3 floorspace and up to 200 sq.m class A4 floorspace over the period to 2028.** The identified quantitative needs should be directed to sites within, or if no suitable sites are available, on the edge of existing district centres.
- **NB2 We do not consider there to be a strong qualitative need for additional provision of large-format supermarket floorspace in this sub-area.** This is owing to the presence of three large supermarkets in the Colindale and Queensbury areas. However, applications which seek to provide new floorspace of this nature should be considered on individual merits, as existing convenience goods floorspace in the sub-area is, on aggregate, over-trading.

- **NB3 The Council should seek to support and enhance the role and function of Kingsbury as an ethnic/specialist food shopping destination.** Our assessment has identified that the role of ethnic/specialist food shopping makes a particularly important contribution to the vitality and viability of Kingsbury district centre, and the Council may wish to consider opportunities to further promote and enhance this role and function.

East Brent sub-area recommendations (Neasden)

- **EB1 The Council should plan for up to 500 sq.m net comparison goods floorspace in the sub-area over the period to 2028.** This should be directed towards sites within, or if no suitable sites are available, on the edge of Neasden district centre. There are two identified opportunity sites in Neasden district centre which would be expected to accommodate the identified needs if brought forward.
- **EB2 No quantitative need for additional convenience goods floorspace is identified.** However, applications which seek to enhance convenience goods provision and improve consumer choice in the sub-area should be considered on their individual merits.
- **EB3 There is no pressing qualitative need for additional convenience goods provision in the sub-area.** However, as Neasden district centre is only served by small Tesco Express and Iceland stores, applications which seek to provide additional convenience goods shopping choice within or on the edge of the centre should be supported in principle.
- **EB4 No quantitative need for additional class A3/A4 provision is identified.** However, applications which seek to enhance existing provision in Neasden town centre should be supported, provided the core retail function of the centre is not undermined.

South East Brent sub-area recommendations (Kilburn, Cricklewood, Willesden Green, Kensal Rise & Queen's Park)

Retail and commercial leisure needs

- **SEB1 The Council should plan for the development of up to 7,200 sq.m net comparison goods floorspace in the sub-area over the period to 2028, and the identified comparison goods need for the sub-area should be directed towards Kilburn town centre in the first instance.** This in order to support and enhance its role as a Major town centre, and is particularly important in light of the competition for spending which has arisen from the opening of Westfield Stratford City, and future competition from the expansion of Brent Cross. The Council should work with Camden Council to ensure the identified quantitative needs can be accommodated in Kilburn town centre.
- **SEB2 The Council should plan for the development of up to 7,500 sq.m net additional convenience goods floorspace across the sub-area over the period to 2026.** The identified convenience goods needs should be met in the centres of Cricklewood and Willesden Green in the first instance, in order to improve consumer choice and competition. Convenience goods floorspace across the sub-area is trading strongly, and some foodstores are trading at significantly above company average levels. In Cricklewood and Willesden Green, the range of main and top-up shopping stores is more limited and, in the case of Willesden, is dominated by a single operator (Sainsbury's). In Kilburn, consumer choice is stronger, and therefore the qualitative need to diversify choice is less pressing.
- **SEB3 The Council should plan for up to 1,200 sq.m class A3 and 600 sq.m class A4 floorspace in the South East Brent sub-area by 2028**. It is recommended that these identified needs are

directed towards Kilburn, to strengthen its role as a Major centre and support an improved evening economy in the centre, however applications which seek to enhance the evening economy all centres should be supported in principle. The Council should work with Camden Council to ensure the identified quantitative needs can be accommodated in Kilburn town centre.

<u>**Kilburn major town centre – role and function**</u>

- **SEB4 The Council should continue to support and promote Kilburn as a Major town centre.** Kilburn has the highest comparison goods turnover of any centre in the Borough, and has increased its market share over the past decade. This positive momentum needs to be protected and enhanced, in light of the increased competition for comparison goods spending which is expected to arise from expansion of Brent Cross, alongside the strength of Central London and Shepherd's Bush as comparison shopping destinations. Kilburn also has a strong convenience goods offer, including several good-sized supermarkets, and a leisure offer which, whilst reasonable, has scope for further enhancement. These elements combined ensure it is a well-performing centre, albeit one which has scope to improve further over the course of the Plan period.

- **SEB5 The retail function of Kilburn town centre should be protected and enhanced**. The Council should retain a defined primary shopping frontage in Kilburn town centre to ensure a critical mass of footfall-generating retailing activity remains, and there is scope for the delivery of additional modern floorspace in the centre through the redevelopment of the Kilburn Market site (see below) which should ideally come forward for comparison goods uses.

<u>**Kilburn major town centre – enhancing vitality and viability**</u>

- **SEB6 The Council should develop a strategy to strengthen and enhance the evening and night-time economy role of Kilburn town centre.** Kilburn acts as the principle evening economy destination for residents of the Cricklewood area, as well as many residents in its immediate catchment, but faces strong competition from a range of other locations including Central London, Camden, Queen's Park and St John's Wood.

  It is recommended that the Council seek to introduce food and drink 'clusters', where a positive planning approach is taken to the introduction of uses which will extend the trading life of the centre from retail hours, through to early and later into the evenings. A cluster to the north of the town centre, which should be focused on The Kiln, is considered a particularly suitable focal point, and the reallocation of frontage in this part of the town centre to secondary shopping frontage will support this objective.

  The enhancement of night-time economy uses such as late night bars and nightclubs should be supported in principle, subject to issues relating to amenity, licencing and public safety being satisfied.

- **SEB7 The Council should explore options for diversifying Kilburn market.** This could include, for example, introducing speciality markets, food markets and night markets. This would provide local residents with an additional reason to visit the centre, enhance the attractiveness of Kilburn as a 'destination', and encourage linked trips within the centre. The diversification could be applied to both the existing market as well as any potential future redevelopment/relocation.

<u>**Kilburn major town centre – development opportunities**</u>

- **SEB8 The Council should seek to bring forward the redevelopment of the Kilburn Market site as the principle opportunity site in Kilburn town centre.** The site offers the opportunity to replace the poor quality market facility and accompanying retail units with larger-floorplate, modern units which are required to support Kilburn's role and function as a Major centre.

Should the comprehensive redevelopment of the site not be possible, at minimum the existing retail units at the site should be modernised and amalgamated to create larger-footprint units.

- **SEB9 Redevelopment of the Kilburn Market site should make provision for a replacement market.** This should either be located on the same site or centrally-located elsewhere in Kilburn town centre. The NPPF recognises the importance which markets play in the vitality and viability of town centres, and therefore it is considered important that a replacement or enhanced market facility is provided should redevelopment of this site come forward.

District and local centres

- **SEB10 The comparison goods shopping function of Cricklewood and Willesden Green district centres should continue to be supported.** It is not recommended that a significant proportion of the identified quantitative need for the sub-area should be directed towards these centres, however applications which seek to deliver new comparison goods floorspace in either centre should be supported in principle, providing it is of a scale appropriate to the role and function of the centre.
- **SEB11 Queen's Park and Kensal Rise's role and function as evening economy destinations should continue to be supported.** Both centres play an important role in the evening economy function of the sub-area, Kensal Rise on account of the independent cinema and Queen's Park as an eating and drinking destination. Development of further uses which support these functions should be supported, but care should be taken that the centre's ability to meet day-to-day shopping needs is not eroded, and the loss of units away from class A1 use should be monitored carefully.

South Brent sub-area recommendations (Harlesden & Church End)

- **SB1 The Council should plan for the development of up to 2,500 sq.m net comparison goods floorspace, up 1,700 sq.m convenience goods floorspace, up to 200 sq.m class A3 floorspace and up to 100 sq.m class A4 floorspace over the period to 2028.** The identified quantitative needs should be directed towards Harlesden district centre as the highest-order centre in the sub-area, and to ensure it remains a resilient shopping destination able to meet local shopping needs in light of the proposed new town centre floorspace at Old Oak Common.
- **SB2 Applications for class A3/A4 floorspace over and above the identified need set out above should be considered favourably, providing they are of an appropriate scale.** Harlesden does not have a strong evening economy offer at present, and many residents are travelling to locations further afield. An enhanced evening economy would retain a greater proportion of spend locally, and help diversify the offer of the town centre away from retail.
- **SB3 The Council should seek to bring forward the redevelopment of Harlesden Plaza as the principle opportunity site in Harlesden town centre**. Redevelopment should seek to intensify the site to introduce a new residential community to the town centre, whilst retaining active ground floor frontage. Any redevelopment of the site should make provision for a replacement supermarket of comparable size to the existing Tesco Metro store, as this store acts as 'anchor' store to the town centre. Enhanced pedestrian linkages with the High Street should be provided.
- **SB4 The Council should explore options for improving the physical appearance of shopfronts in Harlesden town centre.** The environmental quality of the centre has benefited from investment and improvement in recent years. However, there is a need for further investment in the centre to improve its physical appearance, particularly in respect of the quality of its

retail premises and shopfronts in secondary areas of the centre, most particularly High Street south of the Park Parade junction as a key gateway into the centre.

- **SB5 The Council should seek mitigation of the impacts of the proposed new retail & main town centre uses floorspace in the OPDC area on its network of centres, and carefully monitor proposals for an uplift in retail or other 'main town centre uses' floorspace within the OPDC area over and above that which has been identified as expected to come forward in the OPDC Local Plan.**

  The proximity of both Harlesden and Wembley town centres to the OPDC area means that these centres can be expected to experience a degree of trade diversion to the proposed new 'major' town centre which is expected to come forward at Old Oak High Street; this has been confirmed in the OPDC's own evidence base in support of its Local Plan, which undertook a retail impact assessment utilising the findings of the London Borough of Hammersmith & Fulham Retail Study (2016).

  In particular, both centres are expected to experience an impact on their comparison goods turnover. Whilst the evidence set out in Document A of this study identifies that the impacts against the comparison goods turnovers of Harlesden and Wembley town centres could, in percentage terms, be slightly lower than those identified in the ODPC's evidence base, it also identifies that both centres have low comparison goods sales densities (i.e. turnover per square metre of comparison goods floorspace). Wembley achieves a comparison goods sales density of £3,515 per sq.m, and Harlesden £2,669 per sq.m. We would expect a strong performing centre to have a comparison goods sales density of c. £5,000 per sq.m at least, and therefore both Wembley and Harlesden are underperforming in this respect. Further diversion of comparison goods spend away from the centres will serve to reduce these sales densities further.

  In addition, our study has identifies that Wembley has lost 'market share' as a comparison goods shopping destination since the Council's previous evidence base study, despite the opening of the LDO. The anticipated expansion at Brent Cross will leave both centres vulnerable to further trade diversion and a reduction in the performance of their floorspace. The total amount of town centre floorspace expected to come forward in the OPDC (c 57,200 sq.m) is comparable to that of Wembley town centre (including the LDO), and approaching three times that of Harlesden. This is a substantial quantum of floorspace which, if not appropriately mitigated, could clearly leave some of the surrounding centres – including those in Brent – vulnerable. It is therefore important that any diversion of spend away from these centres can be mitigated to as great an extent as possible. The Council will need to continue to push for investment into both centres to mitigate impacts, and particularly enhanced access/linkages to Harlesden town centre from the OPDC area, and this should be acknowledged in the OPDC's new Local Plan.

  Additionally, the Council should monitor any proposals which seek to deliver a level of floorspace above that which has been tested in the OPDC's evidence base, and ensure that impacts on the Borough's network of centres arising from this are fully explored.

5 | Resourcing & delivery considerations

5. Resourcing & delivery considerations

5.1 Given the ongoing resource constraints facing the public sector, it is important that LB Brent takes a pragmatic approach to delivery which maximise the value of its own resource and capacity, whilst making the most of the resource and capacity which exists among external partners.

5.2 Key areas of focus for the Council should including the following:

- Developing of a clear strategy which prioritises the key action areas which can deliver the most value and which makes the most of the capacity provided by the new team of town centre managers
- Making the most of existing funding opportunities, including Borough of Culture, both in terms of the funding available, but also the potential of these schemes to set up delivery frameworks and generate exposure for town centres.
- Ensuring a coordinated (and efficient) approach across the Council and with wider partners.
- Using planning policy levers to deliver against aspirations, especially in regard to future developments, workspace and intensification within town centres.
- Securing support and resource from key local businesses and developers (both financially but also in terms of their buy in, and the nature of their delivery activities). This is particularly prominent around Wembley, where a number of key stakeholders (e.g. Quintain / Wembley Stadium) have a responsibility towards the health of local town centres.
- Leveraging new funding from additional sources, targeting both regional sources, including the Good Growth Fund, and national sources, including the Heritage Lottery Fund.
- Building delivery and management capacity within the Brent community, including resident and business associations and community groups.
- Securing new incomes streams for local reinvestment, including through Council development activity, and through the generation of additional business rates.