LOCAL GOVERNMENT
BOUNDARY COMMISSION
FOR ENGLAND

REVIEW OF
GREATER LONDON, THE LONDON BOROUGHS
AND THE CITY OF LONDON

LONDON BOROUGH OF BRENT

Boundaries with:
- BARNET LB
- CAMDEN LB
- EALING LB
- HAMMERSMITH AND FULHAM LB
- HARROW LB
- ROYAL BOROUGH OF KENSINGTON AND CHELSEA
and THE CITY OF WESTMINSTER

REPORT NO. 651
LOCAL GOVERNMENT BOUNDARY COMMISSION FOR ENGLAND

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SECRETARY OF STATE FOR THE ENVIRONMENT

REVIEW OF GREATER LONDON, THE LONDON BOROUGHS AND THE CITY OF LONDON
LONDON BOROUGH OF BRENT AND ITS BOUNDARIES WITH THE LONDON BOROUGHS OF BARNET, CAMDEN, EALING, HAMMERSMITH AND FULHAM, HARROW, THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA AND THE CITY OF WESTMINSTER

COMMISSION'S FINAL REPORT AND PROPOSALS

INTRODUCTION

1. This report contains our final proposals for the London Borough of Brent's boundaries with the London Boroughs of Barnet, Camden, Ealing, Hammersmith and Fulham, Harrow, the Royal Borough of Kensington and Chelsea and the City of Westminster. We have considered, but not proposed, the partition or abolition of Brent. We have also considered but are not proposing the transfer of certain major areas to other boroughs. However, we are recommending that several residential areas, together with Harrow College of Technology and Northwick Park Hospital, be transferred from Brent to adjoining boroughs. We also recommend that College Park and the Willesden Freightliner Terminal be transferred to Brent from Hammersmith and Fulham and Ealing respectively. In addition, we are making some proposals to remove minor anomalies, for example where properties are divided by boundaries. Our report explains how we arrived at our proposals.

2. We consider it important to record the fact that our current review of Greater London has been, and is being, conducted under the remit set for us by the Local Government Act 1972 and our guidelines from the Secretary of State (contained in Department of the Environment Circular 20/86). This review is not affected by the provisions of the Local Government Act 1992.

3. On 1 April 1987 we announced the start of a review of Greater London, the London boroughs and the City of London as part of the programme of reviews we are required to undertake by virtue of
section 48(1) of the Local Government Act 1972. We wrote to each of the local authorities concerned.

4. Copies of our letter were sent to the adjoining London boroughs; the appropriate county, district and parish councils bordering Greater London; the local authority associations; Members of Parliament with constituency interests; and the headquarters of the main political parties. In addition, copies were sent to the Metropolitan Police and to those government departments, regional health authorities, electricity, gas and water undertakings which might have an interest, as well as to local television and radio stations serving the Greater London area, and to a number of other interested persons and organisations.

5. The London boroughs and the City of London were requested to assist us in publicising the start of the review by inserting a notice for two successive weeks in local newspapers so as to give a wide coverage in the areas concerned.

6. A period of seven months from the date of our letter was allowed for all local authorities and any person or body interested in the review to send us their views on whether changes to the boundaries of Greater London authorities were desirable and, if so, what those changes should be and how they would serve the interests of effective and convenient local government, the criterion laid down in the 1972 Act.

OUR APPROACH TO THE REVIEW OF GREATER LONDON

7. We took the opportunity in our Report No 550, "People and Places", to explain in some detail the approach we take to our work and the factors which we take into consideration when conducting reviews, including the guidelines given to us by the Secretary of State (set out in Department of the Environment Circular 20/86 in the case of the reviews of London).

8. Subsequently, in July 1988, we issued a press notice, copies of which were sent to London boroughs, explaining the manner in which we proposed to conduct the review of London boundaries.
In the notice we said that, from the evidence seen so far, this was unlikely to be the right time to advocate comprehensive change in the pattern of London government - although the notice listed a number of submissions for major changes to particular boundaries which had been made to the Commission, some of which the Commission had itself foreseen in "People and Places". These and other major changes to particular boundaries are being considered by the Commission as it makes proposals for changes to the boundaries of London boroughs.

9. More recently, we have felt it appropriate to explain our approach to this, the first major review of London since London government reorganisation in 1965 and to offer our thoughts on the issues which have been raised by the representations made to us, and by our consideration of them. We have therefore published a general report, entitled "The Boundaries of Greater London and the London Boroughs" (Report No. 627), which discusses a number of the wider London issues which have arisen during the course of this review.

THE INITIAL SUBMISSIONS MADE TO US

10. In response to our letter of 1 April 1987, we received submissions from the London Boroughs of Brent, Barnet, Harrow, Ealing, Hammersmith and Fulham, the Royal Borough of Kensington and Chelsea and the City of Westminster. The London Borough of Camden did not make any submission in respect of its boundary with Brent. We also received representations from two local Members of Parliament, 14 interested organisations and 563 members of the public. Six petitions were also received.

OUR DRAFT PROPOSALS AND THE RESPONSES TO THEM

11. In addition to our letter of 1 April 1987, we published a further consultation letter in connection with this review of Brent's boundaries. This announced our draft proposals and interim decisions to make no proposals, and was published on 31 July 1991. Copies were sent to all the local authorities concerned and to all those who had submitted representations to us. We arranged the publication of a notice advertising our draft
proposals and interim decisions. In addition, the local authorities were requested to post copies of the notice at places where public notices are customarily displayed. They were also asked to place copies of our letter on deposit for inspection at their main offices for a period of twelve weeks. Comments were invited by 23 October 1991.

12. We received a total of 531 individual representations in response to our draft proposals and interim decisions. They included comments from all the affected local authorities, the Rt Hon Sir Rhodes Boyson MP, Mr Harry Greenway MP, Mr Paul Boateng MP, Mr Ken Livingstone MP and Mr Michael Elliott MEP. The remainder were from local councillors, residents and organisations. We also received 197 pro-forma letters and six petitions, containing 758 signatures.

13. In addition to Brent Council's formal response, we received copies of a draft response prepared by Brent's Central Policy Unit. This was considered by the Council, and several important changes were made which were incorporated in its formal submission to us. However, the draft response (hereafter referred to as the 'Central Policy Unit Report') was forwarded to us by the following persons and organisations, as their formal response to our draft proposals: Mr Ken Livingstone MP; the Rt Hon Reginald Freeson; the Liberal Democrat and Labour Groups on Brent Council; and Brent North Labour Party. For this reason, we refer in this report both to Brent's representations to us and to arguments contained in the Central Policy Unit Report, which, it should be understood, does not represent the views of the Council.

SUGGESTIONS FOR CHANGE AND OUR CONCLUSIONS

THE PARTITION OR ABOLITION OF BRENT

14. The submissions received in response to our initial consultation letter of 1 April 1987 included suggestions for radical change to Brent's boundaries. These involved the partition of Brent and/or the amalgamation of parts of the Borough with adjoining authorities. Our interim decisions in
respect of these radical suggestions are set out in the following paragraphs, prior to our final proposals for changes to individual boundaries.

15. Brent made no suggestions for major change to its boundaries. However, the London Borough of Harrow suggested that its boundary with Brent should be realigned to encompass Wembley and Kingsbury, the effect of which would have been to transfer a large part of north Brent to Harrow, together with the West Hendon area of Barnet and a small part of Ealing. Harrow considered that the communities covered by these areas were similar in character to those in its own area and, if amalgamated with Harrow, would readily form a cohesive local government unit. The Council also argued that its total population was below the average for outer London boroughs and that there would be advantages, in terms of the overall efficiency of service provision, if both its area and its population were substantially increased.

16. At the time Harrow submitted its suggestions for change, Harrow District Health Authority had applied to the Department of Health for an extension to its area, to incorporate within it the northern part of the Brent Health Authority. Harrow claimed that there would be substantial advantages, in terms of providing efficient and convenient local government services, if the Borough were to be enlarged in line with the proposed extension of the District Health Authority. However, we were later informed that the District Health Authority's application had not been supported by the North West Thames Regional Health Authority, and had been refused by the Department of Health.

17. Harrow's suggestion for radical change was supported by representations from 37 members of the public. It was opposed by the London Boroughs of Barnet and Ealing, the Labour Group of Harrow Councillors and five members of the public. The Brent and Harrow Family Practitioner Committee (now Family Health Services Authority) and Brent Petty Sessions Area Magistrates' Courts Committee also opposed any change to Brent's boundary with Harrow.
18. The Brent North Conservative Association suggested that Brent should be partitioned by the creation of a boundary along the A406 North Circular Road, to restore the pre-1965 boroughs of Wembley and Willesden. The Association claimed that the effect of the merging of Wembley with Willesden, at the time of London government re-organisation in 1965, had been severely detrimental to Wembley. Accordingly, it requested the restoration of Wembley as a separate authority. In support of its submission, the Association argued that Wembley and Willesden were distinctly separate communities and that, because of both geographical and social factors, it was impossible to create a central 'heart' for Brent. It considered that, taken together, the North Circular Road and the Welsh Harp Lake formed a continuous barrier between the two areas, which, being different in character, had different problems and aspirations. The Association claimed that this had resulted in education, finance, race relations and other aspects of local government in Wembley suffering severely since the merger. The Association also stated that Harrow's suggestion, for its boundary to be extended to the limits of the Wembley and Kingsbury Health Care areas, would be acceptable to many Wembley residents as an alternative to an independent Wembley, provided it included the whole of north Brent.

19. The Brent North Conservative Association's submission was supported by a petition bearing 10,400 signatures calling for the restoration of the borough of Wembley, and by 174 letters from members of the public. The Member of Parliament for Brent North, the Rt. Hon. Sir Rhodes Boyson, also submitted a representation to us in support of the restoration of the former borough of Wembley.

20. The Sudbury Court and the Preston and Mall Residents' Associations both supported the restoration of the former borough of Wembley. Similarly, the Barn Hill Residents' Association suggested that Brent should be divided along the lines of the pre-1965 boundaries. The Barham Park Residents' Association suggested adopting the River Brent as a boundary, to achieve a similar partition of Brent. This last suggestion was supported by a petition containing 144 signatures.
21. Two members of the public submitted a joint suggestion for the dissolution of Brent by the amalgamation with Harrow of that part of the Borough north of the A406 North Circular Road, and the division of the southern part between Kensington and Chelsea, Hammersmith and Fulham, Westminster and Ealing. They recommended the abolition of Brent on the grounds that the present Borough was split by the North Circular Road into two distinct areas, one suburban and the other with urban environmental problems. They claimed that the existing inner city/suburban authority was unmanageable because of these environmental and structural differences. They also referred to the social differences between the two areas.

22. The Preston Amenities Protection Association suggested that a new, separate borough should be created by amalgamating the Parliamentary constituency of Brent North with the adjacent communities of Kenton and south Wembley. The Association claimed that this would reflect the socio-economic differences between these areas and south Brent. The effect of the suggestion was practically the same as that proposed by the Brent North Conservative Association, to restore the borough of Wembley.

23. In addition to the letters from members of the public which were sent to us in support of the above suggestions, we received 88 representations from local residents requesting that the area of Brent to the north of the A406 should be transferred out of the Borough by means of either suggestion. Almost all the representations received were from residents of the northern part of Brent.

24. The representations from members of the public generally expanded on the reasons for change given by Harrow and the Conservative Association in their submissions for radical change. Many asserted that Brent covered a large area which was divided by what the respondents regarded as the major barrier of the A406. They emphasised that the north of the Borough was suburban in character, and that its sense of identity was separate from that of the urban south. Additionally, they considered themselves to be disadvantaged in terms of service provision, with education, public health and refuse collection being the services
most frequently mentioned. In many cases, they suggested that the northern part of Brent had a greater affinity of interest with Harrow, which was regarded as a more efficient local authority. Those representations which requested the restoration of Wembley recalled a well-managed borough which provided economical and satisfactory services.

25. A further view frequently expressed was that Brent was not tenable as an administrative area. Many perceived it as an authority with high revenue expenditure and poor service provision.

Our Conclusions

26. We have a duty to make recommendations to the Secretary of State for such boundary changes as appear to us desirable in the interests of effective and convenient local government. We have received guidelines from the Secretary of State (contained in Department of the Environment Circulars 33/78 and 20/86), which advise us that, in conducting boundary reviews, we should have regard to three criteria: "whether or not an area or boundary accords to the wishes of the people, reflects the pattern of community life, and is conducive to the effective operation of local government and associated services". In the conduct of this review, we have had particular regard to the constraints of paragraph 7 of Circular 20/86, that "...the abolition or creation of a principal area would be appropriate only where the Commission consider that the present arrangements clearly fail to provide effective and convenient local government...".

27. In order to consider whether the abolition or partition of Brent would be conducive to effective and convenient local government, we considered that a number of questions had to be addressed. These included the effectiveness and convenience of local government in Brent at present; whether it was so poor that radical change was required; if problems did exist, whether they would be resolved by radical change; and, if a case had been made for radical change, what effect it would have on north and south Brent and on the structure and pattern of local government in
this area of North West London generally. To this end, we examined all the information we had already received, and sought further information from Brent and Harrow.

28. In geographical terms, Brent is a wedge-shaped segment of North West London. It is criss-crossed by major transport routes, including the A406 North Circular Road and a number of railway lines. Community links within the Borough are said to run north to south. However, Brent is not unique in being divided by a major arterial road, and in the Council's view the North Circular Road did not disrupt the pattern of community life or the effective provision of services. Indeed, Brent claimed to have built up a strong sense of its own identity; as evidence of this, it pointed to the large number of borough-wide voluntary groups which were operating in the borough.

29. It was clear to us from the information provided by Brent that the Borough consisted of areas with "inner city" and "outer London" characteristics - the former located chiefly, but not exclusively, in Willesden, the latter located in the main in Wembley. These areas are not defined by Brent's boundaries: in the north, Brent's boundary with Harrow divides areas of similar socio-economic characteristics, while in the south areas of continuous development straddle its boundaries with Kensington and Chelsea, Westminster and Hammersmith and Fulham. A number of respondents claimed that north and south Brent were so different in character, both environmentally and socially, as to make the existing structure of the Borough unmanageable. However, the conceptions of a "prosperous north" and "deprived south" did not seem to us to present a complete picture of the socio-economic structure of Brent. There was, for example, evidence of social stress in all parts of the Borough.

30. From the representations we had received, and from the substantial amount of information we subsequently collected on the provision of services and the pattern of community life in Brent, we understood that serious problems of service delivery had existed. Although improvements had evidently been made before we published our draft proposals letter, we nonetheless took the view that these problems had contributed to the pressure from
residents of north Brent for radical change. The extent to which these difficulties might have resulted from the policies and priorities of Brent Council since its formation was a matter on which it would have been improper for us to express a view. In any event, they did not appear to us, on the evidence available, to have been a consequence of the size, shape or precise boundaries of the Borough.

31. Nevertheless, it was clear to us that a significant body of opinion in north Brent sought radical change. The wishes of the people are an important consideration in our reviews, and we felt we could not ignore this expression of public opinion. Accordingly, we considered whether any of the suggestions submitted to us for major change would meet the wishes of those seeking transfer from the Borough. We recognised that the adoption of a proposal for radical change could not be taken in isolation; we would need to be satisfied that there would be no adverse effect on the provision of effective and convenient local government in this part of North West London generally. In particular, we would need to be satisfied that adequate arrangements could be made for what remained of Brent, and that residents in that area would not be disadvantaged as a result of the transfer of the northern part of the Borough.

32. We identified two main options arising from the suggestions to partition Brent along the length of the A406 North Circular Road:

(a) the creation of two new, separate boroughs of Wembley and Willesden; and

(b) the amalgamation of the northern and southern parts of the Borough with their neighbouring authorities.

33. We considered these two options, both of which had received considerable support from local residents. However, complications caused by Brent's geography applied to both. Brent is an area traversed by a number of radial transport routes, both road and rail, with significant blocks of industry and a number of extensive railway goods yards. This suggested to us that the
North Circular Road was not the only barrier to movement within the Borough and that, were abolition or partition to be contemplated, it might be achieved by means other than those proposed by Harrow and the Brent North Conservative Association.

34. The creation of two new, separate boroughs of Wembley and Willesden would result in administrative units of approximately 129,000 and 126,000 population respectively. We were aware that, in purely numerical terms, units of such a size were comparable with certain other London boroughs - for example, the Royal Boroughs of Kensington and Chelsea and Kingston upon Thames. However, we did not consider that there were any overall benefits to be gained from increasing the number of London boroughs as part of this review of Greater London. Indeed, our general view, taking account of our guidance from the Secretary of State, was that, where current arrangements clearly failed to provide effective and convenient local government and major change was required, this should, where possible, be achieved by merging rather than dividing authorities. More specifically, in the case of Brent, splitting the authority into two smaller boroughs could exacerbate the problems of providing effective services in Willesden. Certainly, it seemed unlikely that the increased burden on resources would lead to more effective and convenient local government in Willesden.

35. The alternative would have been to amalgamate the two halves of Brent with their neighbouring authorities. Uniting the northern part of Brent with Harrow would have brought together areas of generally similar characteristics, and an enlarged Harrow would not be over-large in relation to other outer London boroughs. However, there would be difficulties in uniting south Brent with any of its neighbouring authorities, or apportioning it amongst them.

36. The five London boroughs adjoining south Brent are, from west to east, Ealing, Hammersmith and Fulham, Kensington and Chelsea, Westminster and Camden. To have united the southern part of Brent with Ealing might, perhaps, have been the most obvious solution in terms of shape. However, the two areas are divided by the industrial estates around Park Royal and North Acton, and
by the radial routes traversing this part of London, such as the A40, the Grand Union Canal and railway lines.

37. We considered the possibility of uniting south Brent with Hammersmith and Fulham, or Kensington and Chelsea, or Westminster; or dividing it between all three. However, such a course of action would have resulted in major upheaval for those authorities in terms of finance and the provision of services, and would have had significant repercussions on the structure of local government in this part of London generally. Moreover, other than in the immediate vicinity of the existing boundary, little evidence of links or similarities between south Brent and these boroughs could be identified. In our view, any borough encompassing areas as diverse and unrelated as Neasden and Fulham, or Stonebridge and Soho, would have no obvious centre, and would be unlikely to form a unit of local government any more cohesive than the currently structured London Borough of Brent. While an amalgamation of Willesden with Camden would have the benefit of uniting the Kilburn shopping centre in a single authority, there would be difficulties in establishing a meaningful boundary between an augmented Camden and the remainder of Brent.

38. We concluded that the arguments advanced for the abolition or partition of Brent were not sufficient, in the context of effective and convenient local government, to warrant the major disruption which would result from such a course of action. Such restructuring should, in our view, be considered only in the context of a comprehensive reappraisal of the pattern of unitary authorities within London as a whole.

39. Accordingly, mindful of our guidelines from the Secretary of State, we took an interim decision to make no proposals for the abolition of Brent, or for its partition into two new boroughs.

40. Our interim decision was supported by Brent and by two members of the public. We received 93 representations and three petitions containing a total of 140 signatures in opposition to our interim decision. Brent argued that the quality of service provision in the Borough had undergone a recent improvement, and
that the continued existence of the authority was in the interests of effective and convenient local government. Indeed, on this second round of consultation, substantially fewer local residents wrote to us to seek the restoration of Wembley as an independent authority; we reflected whether this lower level of response might have resulted from the different policies and priorities now being pursued by Brent Council.

41. The South Kenton and Preston Park Residents' Association commented on what they considered to be the divisive effects of the North Circular Road and adjoining industrial estates. Several other respondents, including the Preston Amenities Protection Association, complained that effective and convenient local government in Wembley was being impaired by its forced association with Willesden. A Brent councillor suggested that the Borough was an artificial creation which had failed to engage the loyalty of its inhabitants. He argued that both Wembley and Willesden could function effectively as separate and independent authorities.

42. The Rt Hon Sir Rhodes Boyson MP and the Brent North Conservative Association suggested that, in rejecting calls for the abolition or partition of Brent, we had given insufficient weight to public opinion. Sir Rhodes considered that the recreation of smaller local government units in London would accord both with the wishes of the people and with the spirit of the Government's Consultation Paper on the Structure of Local Government, which was published in 1991.

43. We gave careful consideration to all these points, but did not feel that the reasoning behind our interim decision had been undermined. In taking account of the representations we received from the residents of north Brent, we had to bear in mind that the wishes of the people are only one of the factors to which we are enjoined to have regard by the Secretary of State. We acknowledged the strength and sincerity of the feelings expressed in those representations, but nevertheless we doubted whether sufficient account had been taken of the need to make suitable and effective provision for Willesden, in the event of a formal separation from Wembley. It seemed likely that any proposal to
divide Willesden between the Boroughs adjoining Brent's southern boundary would meet with strong opposition from the potential recipients; in this context we noted Westminster's objection to our draft proposal to transfer the Carlton Ward of Brent to its area.

44. We reaffirmed our view that major restructuring, involving either the abolition or partition of Brent, would cause significant disruption to local government services in north-west London, and would therefore run contrary to the purpose of the current review. Accordingly, we have decided to confirm our interim decision as final.

WIDER IMPLICATIONS OF OUR DRAFT PROPOSALS

45. While we had concluded that radical change to Brent would be inappropriate in the context of this review, we felt there were several areas where the Borough's boundaries were unsatisfactory, and where some intermediate change was necessary in order to rectify anomalies and reflect communities of interest. Our proposals for change were published in our draft proposals letter of 31 July 1991.

46. In responding to our draft proposals, Brent, together with other respondents, commented on their cumulative effect on the Borough as a whole. We took full account of these broader objections when reviewing each individual draft proposal.

47. In particular, Brent objected to the possible loss both of industrial land (particularly at Park Royal) and of two district hospitals. The Council estimated that 47% of its Primary Employment Areas, as defined in the public consultation draft of its Unitary Development Plan, would be transferred to neighbouring Boroughs if our draft proposals were implemented in full. The Council argued that this would seriously erode Brent's industrial base. In particular, it stressed the strategic importance to the Borough of the commercial premises at Park Royal and Honeypot Lane, situated on its boundaries with Ealing and Harrow respectively. We acknowledged that the retention of
these industrial areas in Brent might be important in community
terms, and in the realm of service provision and development
planning.

48. We felt that the objection to the loss of the Borough’s main
hospitals (Central Middlesex and Northwick Park) was less
compelling. Accessibility is generally more important to patients
than is the particular local authority in which a hospital is
located. However, we recognise the need for close liaison between
health authorities and local authorities over the provision of
services, and accept that, as “care in the community” policies
develop, it will be increasingly important for social services
to have effective links with health services.

BRENT’S BOUNDARY WITH BARNET

West Hendon

49. In response to our letter of 1 April 1987 announcing the
commencement of this review, Brent suggested that the existing
boundary should be realigned along the Edgware Road in the
vicinity of West Hendon, in order to rectify an anomalous stretch
of boundary and unite the Welsh Harp area in Brent. The effect
of this suggestion would have been to transfer the site of the
former West Hendon Hospital, several roads and an area of mainly
open land from Barnet to Brent. Harrow’s radical suggestion, to
unite the Wembley and Kingsbury Health Care areas within Harrow,
discussed in paragraphs 15 and 16 above, also utilised the
Edgware Road for the suggested realignment and would, if
implemented, have had the effect of transferring the same area
from Barnet to Harrow.

50. Barnet acknowledged that the Welsh Harp area is currently
divided by the existing boundary, but opposed the suggestions of
both Brent and Harrow on the grounds that the Welsh Harp
Consultative Committee brought together the various interests in
the area, with the result that the division was not an obstacle
to efficient management. Additionally, Barnet expressed the view
that the Edgware Road would not provide the most satisfactory
boundary between authorities as, in other parts of its length, it severed community centres. It accordingly took the view that the adoption of the Edgware Road as a boundary in the area of West Hendon would be divisive. In Barnet's opinion, a virtue of the existing boundary at West Hendon was that it contained the whole of that community in one authority.

51. The suggestions to adopt the Edgware Road as the boundary in this area were also opposed by a Barnet councillor, the West Hendon Ward of the Labour Party and 12 members of the public. Two petitions, totalling 80 signatures, were also received from West Hendon residents opposed to the suggestions.

52. We also received representations, specifically opposing Brent's proposal, from Mr John Marshall MP, the West Hendon, Hyde and Verulam Court Residents' Associations and 140 members of the public. Two petitions were also received, totalling 981 signatures, opposing the transfer of the West Hendon area to Brent. The Hendon South Conservative Association informed us that a substantial number of West Hendon residents opposed the suggestion that part of their ward should be "arbitrarily" transferred to Brent.

53. We concluded that the northern residential part of the Welsh Harp area of Barnet was dissimilar in character to the adjoining area of Brent. We also took the view that the eastern residential area, being cut off from Brent by the reservoir, shared a community of interest with Hendon, to the east, which would be severed by the suggested realignment. Accordingly, we took an interim decision to make no proposals for this area.

54. We received five representations in response to our interim decision. Barnet, and the Brent North Conservative Association, supported our interim decision. However, Brent maintained that the Edgware Road acted as the Borough's "natural eastern boundary", and was supported in this view by one member of the public. Another local resident suggested realigning the boundary to the Edgware Road between Kingsbury Road and Silk Bridge, and then to the high water mark on the eastern edge of the Welsh Harp reservoir, rejoining the Edgware Road at Brent Bridge. He argued
that Brent was deficient in open space, and would be better placed than Barnet to develop the reservoir as a recreational resource.

55. We acknowledged that there was an element of arbitrariness in the existing boundary, in that it bore no relation to present-day geographical features. However, the division of the reservoir between two authorities did not appear to us, on the evidence available, to be an impediment to the area's effective management. Moreover, we saw no reason to amend our view that a community of interest extended across the Edgware Road in this area. The use of the road as a boundary between Kingsbury Road and Brent Bridge would therefore, in our judgement, be inappropriate. Accordingly, we have decided to confirm our interim decision as final.

BRENT'S BOUNDARY WITH HARROW

a) Larger Scale Proposals

56. Two suggestions were received from members of the public for the transfer of part of north Brent to Harrow, in the event of our deciding against partitioning Brent along the North Circular Road. Both suggestions were submitted on the grounds that the residents of Preston and North Wembley enjoyed a community of interest with Harrow, and looked to that Borough for shopping, leisure facilities and other services. Both representations suggested that these areas had been neglected as a result of their geographical isolation at the northern part of Brent.

57. The first suggestion (transferring approximately 20,000 electors) recommended that the boundary should reflect the postal districts in Preston and North Wembley, by a realignment from Kingsbury Circle westwards along the Mall to Preston Road, south to East Lane, west to Watford Road, north to Sudbury Court Drive then south-west along Sudbury Court Drive to rejoin the existing boundary. The second suggestion (transferring approximately
35,000 electors) was for the boundary to be realigned westwards from Stag Lane along Beverley Drive and south down Honeypot Lane to Kingsbury Circle. From this point the suggested boundary would pass south down Fryent Way and King's Drive, and west along the southern curtilages of Forty Avenue, East Lane, Sudbury Court Road and Sudbury Court Drive. It would then follow the eastern curtilage of Greenford Road as far as its junction with Whitton Avenues East and West.

58. We considered that both suggested realignments would, if adopted, divide local community centres and areas of continuous urban development. Nor were we convinced that either of them reflected the pattern of community life in north Brent, or would enhance effective and convenient local government in the area. We therefore took an interim decision not to propose major change in this area.

59. Five members of the public commented on our interim decision. One suggested a realignment along The Mall, Preston Road and East Lane, arguing that this would reflect the social and historical ties between north-west Brent and neighbouring areas in Harrow. Three other local residents sought a realignment along East Lane, in order to transfer the Sudbury Court Estate to Harrow. A further member of the public favoured the transfer of Sudbury and Sudbury Court Wards to Harrow, on the grounds that many residents of these wards shopped in Harrow, and made frequent use of facilities provided by that Borough.

60. We considered all of these suggestions, and noted that although they were submitted as alternatives to partitioning Brent, they would still have far-reaching effects on the provision of local government services in North-West London. The suggested realignments appeared to us to cut arbitrarily through residential development, and to divide communities in Wembley. We therefore reaffirmed our earlier view that major change in this area would cause considerable upheaval, and be detrimental to effective and convenient local government. Accordingly, we have decided to confirm our interim decision as final.
61. Having rejected major change, we considered the suggestions received for minor changes to this boundary. Our interim decisions and final proposals are set out in the following paragraphs.

b) **Greenford Road and Sudbury Court Drive**

62. Brent submitted suggestions for change in the areas of Greenford Road and Sudbury Court Drive. Harrow submitted similar suggestions, prior to the submission of its radical proposal to realign this boundary further to the south. Both Brent and Harrow suggested realigning the boundary along Greenford Road, between its junction with Sudbury Hill and the existing Brent/Ealing boundary, thereby transferring a number of properties on the eastern side of Greenford Road from Harrow to Brent. Brent did not specify the exact line of the realignment. Harrow suggested using the eastern side of the highway.

63. These suggestions were supported by Harrow East Conservative Association but opposed by a petition containing 270 signatures from the Sudbury Hill (Harrow) Residents' Association, and representations from seven members of the public.

64. Linked with its suggestions for Greenford Road, Brent suggested a boundary change in the area of Sudbury Court Drive. The effect would have been to realign the boundary from the northern end of Greenford Road, north up Sudbury Hill to the north-western curtilage of No. 5 Sudbury Hill and then along the rear curtilages of properties on the north-western side of Sudbury Court Drive, to join the existing boundary at the rear of 36 Littleton Road. Such a realignment would have transferred properties on the eastern side of Sudbury Hill and the northern side of Sudbury Court Drive, together with one property in Hermitage View, from Harrow to Brent. In the event of our not adopting this realignment, Brent suggested that Nos. 20–24 Sudbury Court Drive be transferred from Harrow to Brent. Both these suggestions were opposed by four members of the public.
65. Harrow suggested that the boundary in this area be realigned along the length of Sudbury Court Drive and north-east along Watford Road to the south-east corner of the rugby football ground at Northwick Park. The effect would have been to transfer five roads north of Sudbury Court Drive, known as the Pebworth Estate, from Brent to Harrow. This suggestion was supported by the Harrow East Conservative Association and by eight members of the public, one of whom proposed that it be extended to follow the natural feature of high ground south of Sudbury Court Road.

66. The present boundary in this area is well defined and undefaced. Accordingly, as we had received no evidence that the suggestions from Brent and Harrow would result in any significant benefits in terms of improvements to effective and convenient local government, we took an interim decision to make no proposals.

67. Brent did not comment on our interim decision. However, Harrow restated its view that the Pebworth Estate looked to the north, and should be transferred to its area. A local resident suggested that only the northern side of Pebworth Road should be transferred to Harrow.

68. Harrow, the Wembley division of the Metropolitan Police and a member of the public all disputed our view that the boundary is well-defined in Sudbury Court Drive. They pointed out that the road is split between two authorities, with three properties (Nos. 20-24) being in Harrow. The Metropolitan Police informed us that this division had led to properties at the western end of Sudbury Court Drive being excluded from the local neighbourhood watch scheme. All these respondents suggested that the boundary be realigned to the centre of Sudbury Court Drive, between Hermitage View and the junction with Sudbury Court Road.

69. The Metropolitan Police also suggested two other minor amendments: first, to transfer Nos. 1025-1027 Harrow Road to Harrow; and second, to align the boundary to the eastern curtilage of Watford Road between Pebworth Road and Harrow School Farm. The police argued that, for operational purposes, it would
be simpler if Watford Road were in the same authority as the properties fronting it.

70. Our interim decision was supported by the Brent North Conservative Association.

71. We reaffirmed our view that the Pebworth Estate should remain in Brent: it is separated from Harrow by extensive playing fields, and appears to us to be linked to Wembley. In our judgement, the existing boundary along the southern perimeter of the playing fields is well-defined and does not detract from effective service provision. A realignment along the centre of Pebworth Road, as suggested by a local resident, would serve only to split the Pebworth Estate.

72. We acknowledged the concern of the Metropolitan Police over the division of Sudbury Court Drive. However, the existing boundary does not split properties, and we observed that a realignment to the centre of Sudbury Court Drive would not unite the road in one authority. Similarly, we doubted the necessity of the other minor changes suggested by the Metropolitan Police. The boundary in the vicinity of Nos. 1025-1027 Harrow Road follows property curtilages and is not defaced. The second suggestion, affecting a short stretch of Watford Road between Pebworth Road and Harrow School Farm, was contingent on our confirming as final our draft proposal for Northwick Park (see paragraphs 86-100 below). Nevertheless, we did not consider that an alignment to the eastern side of Watford Road in this area would result in any significant benefits in terms of effective and convenient local government. Accordingly, we have decided to confirm as final our interim decision to make no proposals for Greenford Road and Sudbury Court Drive.

c) Area east of Honeypot Lane

Draft Proposal

73. Brent suggested a realignment to rectify a defaced and ill-defined length of boundary between Honeypot Lane and Burnt Oak
Broadway (A5), by realigning the boundary north from the existing boundary at Turner Road and along the rear curtilages of properties in Mollison Way and the Highlands, to rejoin the boundary with Barnet at the A5. An identical suggestion was received from the Labour Group of Harrow Councillors.

74. Harrow also suggested a realignment in this area, following a line east from Honeypot Lane, along Cumberland Road, the eastern part of Beverley Drive, Holyrood Gardens and Stag Lane to meet the boundary with Barnet at the A5. Its suggestion was supported by the Harrow East Conservative Association and by one member of the public, but was opposed by the Labour Group of Harrow Councillors. A member of the public suggested a realignment identical to the western part of Harrow's suggestion but, to the east, adhering to the entire length of Beverley Drive, and thence along Holmstall Avenue to meet the existing boundary farther south on the A5.

75. We considered that the current boundary, by dividing properties and roads, was unsatisfactory and caused confusion. We agreed that, in the interests of effective and convenient local government, a more clearly identifiable boundary was required. However, we noted that this is an extensively developed area of similar character, without any features or breaks in development offering natural boundaries.

76. We considered the suggestions submitted to us for boundary changes in the area, together with other possible alternatives. We decided to adopt as our draft proposal a line from Honeypot Lane, along the northern curtilage of Kingsbury Hospital, north along the Jubilee Line railway and then east along the rear curtilages of properties on the southern side of Beverley Drive and Holmstall Avenue, to meet the existing boundary with Barnet at the A5. We considered that such an alignment had the merit of offering the best defined boundary, without dividing focal points of community or shopping centres in this residential area.
Final Proposal

77. We received eight representations in support of our draft proposal, and thirteen objections. Brent raised three separate objections. It believed that our draft proposal would, firstly, split a community focussed on Queensbury Station Parade, which it described as the 'natural hub' of the local community. Second, it would divide the J. Laing Estate, which is listed as an 'area of special residential character' in the public consultation draft of Brent's unitary development plan. Third, our draft proposal would remove from Brent a 'primary employment area' stretching across Cumberland Road. Brent pointed out that the southern part of this industrial estate was due for redevelopment, and the Council was concerned that any investment should be maximised for the benefit of Brent residents. The Council also pointed out that it owned housing stock off Mollison Way, and had earmarked part of the Brixton Estate in De Havilland Road for redevelopment.

78. Education was a further issue raised by respondents. We were informed by the Department of Education and Science that Brent operated a two-tier education system, and Harrow a three-tier system. Kingsbury High School argued that this was significant, in that children living in the area affected by our draft proposal would have to travel to a tertiary college in the far north of Harrow if they wished to continue with in-borough education after the age of sixteen. A local resident argued that Harrow had insufficient spare capacity in its schools to absorb pupils from the area proposed for transfer.

79. Harrow itself supported our draft proposal, which it considered had been well-received by residents. Support was also forthcoming from a Brent councillor and from the Wembley Division of the Metropolitan Police, which expressed the view that our draft proposal would improve links between the the local police division and residents of Queensbury. Two members of the public commented that the area between Beverley Drive and the existing boundary had been poorly managed by Brent; they cited as evidence of this the recent closure of a branch library in Mollison Way. However, Brent pointed out that it was proposing to reopen this
library, and had delayed doing so only because of the uncertainty over a possible boundary change. Another member of the public argued that residents of Queensbury naturally gravitate towards the shops and community facilities in Harrow, as those in Brent are distant and difficult to reach.

80. There appeared to be a general acceptance that the existing boundary east of Honeypot Lane is unsatisfactory, being defaced in several areas. However, some respondents had reservations about the precise alignment of our draft proposal, and suggested alternatives. Brent suggested that the boundary be continued along Honeypot Lane as far as Taunton Way, before following Taunton Way and Camrose Avenue east to the A5, on the grounds that these roads delimit communities. The Brent Labour Party Local Government Committee suggested an alignment along the Highlands and the rear curtilages of properties in Mollison Way, due west across Turner Road and then south along the railway line to the existing boundary. Three members of the public separately suggested alignments along Mollison Way, in conjunction with alignments either along the Highlands or Stag Lane. Another suggested that the boundary should follow the rear curtilages of properties in The Highlands and the eastern half of Mollison Way, before following Waltham Drive southwards, and the rear curtilages of properties in Calder Gardens westwards, as far as the existing boundary.

81. The Brent North Conservative Association, which shared Brent's concern over the possible division of the J. Laing Estate, suggested an alignment along Stag Lane, De Havilland Road and the rear curtilages of properties in Lawrence Crescent and Calder Gardens. A local resident suggested that Beverley Drive would provide the most suitable boundary in the area.

82. We gave careful consideration to all these, and other, possible alternatives. Our draft proposal had attracted some criticism on the grounds that it cut through an homogeneous community. However, we felt that in an area such as Queensbury, which lacks obvious delineating features, any realignment would inevitably run through neighbourhoods which were architecturally and socially similar. We questioned whether alignments along
major thoroughfares, such as Camrose Avenue, Mollison Way or Beverley Drive, would improve on our draft proposal, as these roads appeared to us to act as foci for local communities, rather than as clear dividing lines.

83. We also recognised the concerns of Kingsbury High School over tertiary education provision. However, we considered that its reservations had been substantially met by recent Court of Appeal rulings, which have reinforced parents' rights to choose a school regardless of local authority boundaries.

84. We felt that our draft proposal had the advantage of using two clear breaks in residential development - first along the rear of properties in Holmstall Avenue, and secondly to the north of Kingsbury Hospital. However, we recognised the force of some of Brent's arguments against our draft proposal: in particular, we were persuaded that the industrial/commercial area situated to the north of Kingsbury Hospital should be retained within the Borough, and that the Laing Estate should remain united in one authority. Accordingly, we have decided to withdraw part of our draft proposal, so retaining the existing boundary west of the Jubilee Line railway.

85. East of the railway, we considered that the alignment suggested by the Brent North Conservative Association - along Stag Lane, De Havilland Road and the rear curtilages of properties in Lawrence Crescent and Calder Gardens - had the merit of providing an identifiable boundary which utilised a break in residential development in De Havilland Road. We have therefore decided to adopt the Conservative Association's suggestion as our final proposal in this area.

d) Northwick Park Hospital and Harrow College of Technology

Draft Proposal

86. Harrow suggested a realignment eastwards from the Watford Road along the rear curtilages of properties in Norval Road, then
north along the Bakerloo railway line to meet the existing boundary at Kenton Road. The effect of this suggestion would have been to transfer Northwick Park, Northwick Park Hospital, Harrow College of Technology, three residential roads and the south side of part of Kenton Road from Brent to Harrow. Harrow submitted this suggestion on the grounds that it would be more cost-effective if the hospital were located within the area of its controlling District Health Authority, and that the adjacent residential area was close to Harrow town centre, to which it looks for services.

87. The suggestion was supported by the Harrow East Conservative Association and by two members of the public. The Labour Group of Harrow Councillors supported the suggestion to transfer the Hospital and College but opposed the transfer of the residential area; it considered that Kenton Road provides a natural boundary which should be retained. Brent did not comment on Harrow's suggestion.

88. We considered that Northwick Park Hospital, the residential roads to the north and, particularly, Harrow College of Technology look towards Harrow, in respect both of administration and service provision. We took the view that it would be in the interests of effective and convenient local government for this area to be located within Harrow. We therefore adopted Harrow's suggestion as our draft proposal.

Final Proposal

89. Brent opposed our draft proposal. It pointed out that Northwick Park Hospital had applied for National Health Service Trust status, which, if granted, would have weakened the hospital's links with Harrow Health Authority. (In the event, the application was refused). It also informed us that Harrow College had become an annexe of the Polytechnic of Central London, with Harrow itself having no role in its management. Brent commented that students were increasingly drawn from areas outside North-West London.
90. Brent also objected to the transfer of Northwick Park to Harrow. It regarded the Park as being of particular importance to Brent, which in its view is deficient in public space. The Council commented that it organises sports events in the Park, and said that the sports facilities are used mainly by residents of Brent. It believed that our draft proposal would diminish local authority accountability to these users, particularly in relation to planning matters. Brent also pointed out that there is no vehicular or pedestrian access to the park from Harrow.

91. The Rt Hon Sir Rhodes Boyson MP and Mr Paul Boateng MP, together with 46 other respondents, also objected to our draft proposal insofar as it affected Northwick Park. In general, these representations reiterated the points made by Brent. However, concern was also expressed over the possibility of development in the park, and resultant traffic congestion. A Brent councillor and the Sudbury Court Residents' Association feared that Harrow would take a more positive view of development schemes than Brent. The St. Cuthbert's Church Parochial Church Council commented that Brent has taken effective measures to control social and leisure activities in the park, such as the flying of model aircraft, which disturb local residents; it considered it important that the local authority responsible for Northwick Park should be answerable to those residents.

92. A local resident pointed out that five electors resident in Northwick Park Pavilion would be transferred to Harrow under our draft proposal, even though access to the pavilion was via the Fairway, in Brent. A second member of the public considered it unreasonable that Harrow residents should be required to contribute to the upkeep of a park which they rarely use, while a third felt that our draft proposal would make it more difficult to police the area effectively.

93. Harrow, and nine other respondents - including a Brent councillor, Harrow East Conservative Association and the Jubilee and Bakerloo Lines Users' Committee - supported our draft proposal insofar as it affected the Park, the college and the hospital. One local resident believed that Harrow would be more likely than Brent to protect Northwick Park from development. The
proposal to transfer the college and hospital was described as "soundly based" by the North-West Thames Regional Health Authority, which commented that the hospital is serviced by Harrow, and draws most of its patients from that Borough.

94. We received 14 representations, and 197 pro-forma letters, supporting that part of our draft proposal affecting the residential area west of Kenton Station. A further four respondents objected to this part of our draft proposal. Brent, together with a Brent councillor, argued that Churchill Avenue, Rushout Avenue and Northwick Avenue — collectively known as the Northwick Park Triangle — form an integral part of the Spencer Churchill Estate, which straddles the Bakerloo Line railway. Brent argued that the shopping zone alongside Kenton Station forms the focal point of the estate, and suggested that plans for a new supermarket, on land immediately to the east of the Station, would strengthen the ties between the Triangle and Brent. The Brent North Conservative Association commented on the historic connections between the triangle and Wembley. It felt that the Kenton Road provides the clearest and most logical boundary in this area.

95. Harrow, the Metropolitan Police and a large number of local residents supported this part of our draft proposal. The Northwick Park Residents' Association suggested that the neighbourhood looks to Harrow for service provision, with schools, shops and leisure facilities all being conveniently located north of the Kenton Road. The Association forwarded details of a survey which it had conducted in the locality: 73% of affected households were recorded as having supported our draft proposal, with just over 1% expressing opposition. A public consultation exercise conducted by Harrow showed similar results. Those residents who commented to us directly mentioned the Triangle's proximity to Harrow town centre, and its comparative remoteness from administrative facilities in Brent.

96. In assessing the response to our draft proposal, we noted the distinction drawn by respondents between the park, college and hospital on the one hand, and the residential triangle on the
other. We recognised that the main opposition had been to the transfer of Northwick Park to Harrow.

97. The argument over which local authority would be the better custodian of Northwick Park seemed to us to be inconclusive and of limited relevance. The Park is designated as Metropolitan Open Land, within the terms of the Department of the Environment's Regional Planning Guidance for London, and the presumption against development will remain regardless of which planning authority has responsibility. We accepted, however, that Brent takes an active interest in the park's management, organising sporting events and activities for the Borough's schoolchildren. In view of this, and the fact that the Park is accessible only from Brent, we concluded that it would be inappropriate to confirm this part of our draft proposal.

98. Brent's arguments on the question of the college and hospital seemed to us to be less persuasive. Neither the college nor the Polytechnic of North London opposed our draft proposal, and we were informed that Harrow has retained a role in the administration of the college. Additionally, the hospital remains under the control of Harrow Health Authority, and receives services from Harrow. Taking this into account, we reaffirmed our view that the transfer of the college and hospital to Harrow would be in the interests of effective and convenient local government.

99. The Northwick Triangle is separated from Brent by two intersecting railway lines, and its proximity to Harrow town centre suggests a community of interest with that area. This was borne out by residents' comments. The Spencer Churchill Estate is already divided by the Bakerloo Line, which appears to us to constitute a significant barrier between communities.

100. Accordingly, we have decided to confirm as final only that part of our draft proposal from Kenton Road south to the Metropolitan line. Thereafter, we have decided to adopt as our final proposal an alignment along the southern embankment of the Metropolitan Line as far as Northwick Park Station, and then south and west along the perimeter of the hospital grounds,
rejoining the existing boundary at Watford Road. This would keep Northwick Park in Brent, but transfer the college, the hospital and the Northwick Triangle to Harrow.

THE BOUNDARY BETWEEN BRENT AND EALING

101. In response to our letter of 1 April 1987, we received suggestions for major realignments along the entire length of this boundary, as well as several suggestions for minor changes. In the interests of clarity, we have addressed the issues along the boundary in three sections.

a) Barham Ward (Boundary with Harrow to Bridgewater Road)

Draft Proposal

102. Neither Brent nor Ealing suggested changes to this stretch of boundary. However, the Ealing Social Democratic Party suggested a realignment from Sudbury Hill Station east along the Piccadilly Line to the point at which it is crossed by Bridgewater Road, then south down Bridgewater Road to the existing boundary. We agreed that the existing boundary is ill-defined, particularly in the area of Northwood Gardens, and took the view that a realignment along the Piccadilly Line would provide a clear, identifiable and durable boundary. Accordingly, we adopted the Ealing Social Democratic Party's suggestion as our draft proposal.

Final Proposal

103. Our draft proposal was supported by Brent, Ealing and by two members of the public. Brent considered the Piccadilly Line in this area to be a major natural barrier.

104. We received twelve representations opposing our draft proposal. The Central Policy Unit Report argued that the area immediately south of the Piccadilly Line had close historical links with Sudbury, to the north. Mr Harry Greenway MP also expressed the view that this area had stronger connections with Sudbury and Wembley than with Ealing. He accepted, however, that
the existing boundary was unsatisfactory. As an alternative to our draft proposal, he suggested a realignment along the rear of properties in Whitton Avenue East between Greenford Road and Allendale Road, the centre of Allendale Road as far as the underground line, and then along the underground line eastwards, and Bridgewater Road southwards, to the existing boundary.

105. Mr Michael Elliott MEP and the Ealing Labour Party contested the view that the underground line acts as a dividing line between communities. They believed that our draft proposal would cause unnecessary disruption to established patterns of community life. Brent North Conservative Association objected to our draft proposal on the grounds that it altered Wembley's historic boundaries, and might reduce the likelihood of Wembley being restored as a separate borough as part of a future review.

106. A Brent councillor considered the Piccadilly Line to be no better a boundary in this area than Whitton Avenue East, or the Grand Union Canal. Three respondents drew our attention to the break in development provided by Horsenden Hill, although only one suggested its adoption as a boundary. A member of the public suggested that, if change were considered necessary, the best option would be to transfer Polling District SEE of Brent's Barham Ward to Ealing, by a realignment north along Bridgewater Road from the existing boundary, west along Roundtree Road and south along the path linking Roundtree Road with Whitton Avenue East.

107. We gave careful consideration to the various comments and suggestions made by respondents. Although we acknowledged that Horsenden Hill does provide a clear break in development, we had no evidence to suggest that the residential area south of Whitton Avenue East would be more effectively administered if transferred from Ealing to Brent. We also considered that minor realignments to the boundary would be unsuitable, as Whitton Avenue East appears to form the centre of a community.

108. We remained of the view that a realignment along the Piccadilly Line would create a clear, identifiable boundary, and unite the community centred on Whitton Avenue East. We have
therefore decided to confirm as final our draft proposal between Greenford Road and Bridgewater Road.

b) Alperton (Bridgewater Road to North Circular Road) Map 5

Draft Proposal

109. Brent and Ealing did not suggest any changes to this stretch of boundary. The Ealing Social Democratic Party suggested a realignment along the Grand Union Canal from the Clifford Road allotment gardens to Manor Farm Road, and then south along Manor Farm Road and Alperton Lane as far as the existing boundary. This would have had the effect of transferring the Lily Gardens Estate, adjoining Manor Farm Road, from Brent to Ealing, and of uniting light industrial premises south of the Grand Union Canal in Ealing. A member of the public suggested a realignment along the Piccadilly Line from Bridgewater Road east to the point at which the railway crosses the Grand Union Canal, and then eastwards along the canal to the North Circular Road. This suggestion was intended to simplify the boundary in the Alperton area.

110. We took the view that a realignment along the Piccadilly Line and the Grand Union Canal would take advantage of structural breaks and therefore provide a clearly defined boundary. We also considered that it would reflect community ties, by uniting Perivale in one authority. We therefore decided to adopt the suggestion from a member of the public as our draft proposal.

Final Proposal

111. Brent supported our proposed realignment along the Piccadilly Line, but considered that the boundary should continue along the railway as far south as Twyford Abbey Road, instead of diverting to the Grand Union Canal. It argued that the railway was an effective barrier both north and south of the canal. Ealing supported our draft proposal in full, as did two members of the public, who believed that our proposed alignment would be easier to identify on the ground than the existing boundary, and
therefore less confusing to local residents. The Wembley Division of the Metropolitan Police suggested, as a slight modification to our draft proposal, that the boundary should be aligned to the northern, rather than the southern, bank of the Grand Union Canal between the Piccadilly Line and the North Circular Road. This was intended to ensure that the whole length of the canal in this area would be in one authority.

112. We received 15 objections to our draft proposal. The Central Policy Unit Report provided a detailed list of facilities which would be transferred out of Brent if our proposal were implemented. These included council housing; two primary employment areas; a workshop for disabled people; the Alperton Sports Ground; and Brent's central works depot in Marsh Road, which houses the Borough's Contract Services Department. The report argued that relocation of the depot would be expensive, and disrupt service provision in Brent. It also noted that our draft proposal divided the Ealing Road, which it suggested was a focal point for the surrounding Gujerati community.

113. The loss of facilities, and the question of community ties, were also mentioned by a Brent councillor and the Birchen Grove Residents' Association. Ealing Labour Party claimed that Vicars Green Primary School, in Lily Gardens, has close connections with Alperton High School, and that residents of the Lily Gardens Estate look to Alperton for services. A second Brent councillor also objected to the proposed transfer to Ealing of the primary school in Lily Gardens, although he acknowledged that residents in the near neighbourhood might have affinities with Ealing. He suggested that, if we decided to opt for more minimal change, we should consider the possibility of continuing the boundary along Manor Farm Road between Pleasant Way and the Central Line. The same suggestion was put forward by a member of the public.

114. The councillor also questioned whether the Grand Union Canal delimited communities, and pointed out that the Abbey Estate, located between the canal and the River Brent, was linked to the area north of the canal by a footbridge. In addition, he saw no benefit, in terms of effective and convenient local government, in transferring to Ealing the narrow strip of development in
Bridgewater Road, to the west of One Tree Hill recreation ground. He pointed out that this area was cut off from Perivale, in Ealing, by Sudbury Golf Course and Alperton Cemetery. Four members of the public specifically objected to the transfer of this cemetery, which, they said, had traditionally catered for residents of Wembley.

115. Mr Harry Greenway MP commented that the Abbey Estate is dependent on Alperton for shopping facilities, and suggested that the recent opening of a supermarket in the Ealing Road would serve only to increase these links. His views were supported by two residents of the Abbey Estate, who considered the River Brent to be a more significant barrier in this area than the Grand Union Canal. Mr Greenway suggested that the boundary should be continued along the Grand Union Canal between Clifford Road and Ealing Road, and then follow Ealing Road south to the existing boundary by Riverside Gardens. The Ealing Labour Party considered the Abbey Estate to be isolated from all surrounding areas, but felt that, on balance, its affinities of interest were with Brent, rather than with Ealing.

116. We accepted the force of the argument against the transfer to Ealing of the various local authority properties situated south of the canal. We acknowledged that the transfer of these properties to Ealing would, in the short term at least, cause dislocation to services in Brent, and that the interests of effective local government would be better served by retaining them in that Borough.

117. Although only two residents of the Abbey Estate commented directly to us, we felt we had sufficient information to conclude that the Estate looks mainly north to Alperton. We acknowledged that the River Brent and the North Circular Road are significant physical features which tend to limit north-south movement in this locality.

118. We concluded that the existing boundary could be substantially retained from the point in the west where Bridgewater Road crosses the Piccadilly Line to the point in the east where it leaves the River Brent. However, we felt that the
Lily Gardens Estate, to the west of Manor Farm Road, was closely connected to contiguous residential development in Ealing, and could be more effectively and conveniently administered from that Borough. Accordingly, we have decided to modify our draft proposal, and to adopt as our final proposal a suggestion from a Brent councillor, for a realignment along Manor Farm Road and Alperton Lane between Pleasant Way and the existing boundary, together with a minor realignment along the Grand Union and Manor Farm Road south of Clifford Road, in order to unite industrial premises in Ealing.

c) West Twyford/Park Royal (North Circular Road east to Boundary with Hammersmith and Fulham) Maps 5, 6 and 7

Draft Proposal

119. Brent and Ealing suggested only minor realignments in this area. Brent suggested a centre-of-road realignment along Coronation Road, to rectify an area of undefined and defaced boundary at the site of the former British Rail freight depot. In the adjacent area at Acton Lane, Ealing suggested a realignment along the southern frontage of the Central Middlesex Hospital, on the grounds that this would reflect the existing arrangements for highway maintenance. Ealing also submitted a minor suggestion to realign the boundary from the centre to the southern side of Harley Road, to facilitate road maintenance in the area.

120. In the vicinity of Iveagh Avenue, Ealing suggested that a more logical boundary could be formed by extending the existing boundary along the River Brent to meet the Grand Union Canal, passing south-east along the canal and then returning to the present boundary westwards along Twyford Abbey Road. The West Twyford Residents' Association suggested that the Brent/Ealing boundary should be extended to the Grand Union Canal, in order to transfer Elveden Road, Elvedon Place and the Abbeyfields development to Ealing. The Association did not, however, delineate a boundary to achieve this.
121. The Ealing Conservative Associations (Ealing Acton, Ealing North and Ealing Southall) considered this stretch of the boundary between Brent and Ealing to be in need of radical change. They suggested that the boundary should be realigned to follow the River Brent to its junction with the Grand Union Canal and then follow the canal eastwards to Old Oak Lane. This would have had the effect of transferring part of Park Royal from Brent to Ealing, and three residential streets, some industrial land and the Willesden Freightliner terminal from Ealing to Brent. The Associations considered that their suggestion, if adopted, would have had the advantage of uniting West Twyford in Ealing, on which authority, they said, this community depended for primary schools and civic amenities.

122. The Ealing Social Democratic Party also considered that radical change to the boundary was necessary, on the grounds that it did not satisfactorily relate to the pattern of communities and transport linkages in this highly urbanised area. It suggested a realignment along the Central Line eastwards from Alperton Lane to Old Oak Common Lane, in order to unite communities and place the main body of the Park Royal industrial estate under the control of a single planning authority. A member of the public submitted an identical suggestion.

123. Another member of the public suggested a realignment following the Grand Union Canal, from the point at which it crosses the River Brent eastwards to Old Oak Lane. This suggestion was intended to overcome the claimed divisive effect of the main British Rail line and sidings between Wembley Central and Willesden Junction.

124. The existing boundary between Brent and Ealing is generally ill-defined, dividing not only roads and properties but also the community of West Twyford and the industrial area of Park Royal, all of which appeared to us (on the information then available) to look to Ealing for amenities and services. West of the North Circular Road, we decided to adopt as our draft proposal a line northwards along the eastern curtilage of the North Circular to meet the British Rail line, and then eastwards along the southern
edge of the railway and the Freightliner Terminal at Willesden Junction, to the existing boundary with Hammersmith and Fulham. In our view, such a realignment had the advantages of providing a clearly identifiable boundary which would unite West Twyford and Park Royal in Ealing.

Final Proposal

125. Brent opposed our draft proposal, on several grounds. It pointed out that the portion of the Park Royal industrial estate currently in Brent accounted for 30% of the Borough's 'primary employment land' and contained several major employers who drew labour from communities in Brent, such as Stonebridge and Harlesden. It argued that, as Park Royal had strategic and regional significance, planning matters should not be the preserve of a single borough; any possible negative effects of division had, in Brent's view, been overcome by the creation of inter-borough management and planning agencies, such as the Park Royal Partnership. The Council commented that close links had been forged between employers based in Park Royal and local colleges in Brent, leading to work placement schemes and training programmes.

126. The Council expressed the view that Park Royal would be disadvantaged if it were united in Ealing. It pointed out that Brent was eligible to apply for Government funding under the Urban Programme and the City Challenge initiative, and that consideration was being given to making Park Royal the focus of a City Challenge bid to the Department of the Environment. Since Ealing was not eligible to apply for such funding, Brent felt that our draft proposal could have a detrimental effect on the redevelopment of Park Royal.

127. We received a further 18 objections to our draft proposal. The North-West London Training and Enterprise Council believed that uniting Park Royal in Ealing would hinder the area's regeneration, as Brent had been heavily involved in framing schemes for renewal. In addition, it suggested that the current division of Park Royal was beneficial in that it provided for an element of competition between the three boroughs responsible for
the area. Brent Trades Union Council was concerned that our draft proposal could endanger a major consortium-led development project known as Park Royal International. We understood, however, that work on this project had been suspended, pending a revival of the property market.

128. A number of Park Royal respondents argued that our draft proposal would sever relationships built up between private companies and local authorities. Guinness plc informed us that it was represented on Brent's Urban Regeneration Agency, and commented appreciatively on the co-operation it had received from the Council. It suggested that a small area of land between Coronation Road and the Western Avenue, which formed part of its property holdings, should be transferred to Brent. McVitie's Ltd also indicated that it would prefer its premises, off Acton Lane, to remain in Brent.

129. The Metropolitan Police suggested that Park Royal had better transport links with Brent than with Ealing, and Brent commented that these links with its area would be further improved when the road connecting Abbey Road to the North Circular was completed in 1994. The Wembley Rifle Club, located on land adjacent to this link road, said that it had strong ties with Brent; it mentioned that the Mayors of Wembley - and, latterly, those of Brent - had traditionally been ex-officio presidents of the club. The Rifle Club suggested that the line of our draft proposal be modified slightly in the area of the link road, in order to retain its premises in Brent. Other respondents, including Mr Harry Greenway MP, suggested that the boundary be aligned to the River Brent between the Grand Union Canal and the railway embankment, to take account of the barrier effect of the river and to avoid defacement when the Abbey link road was completed.

130. The proposed transfer of the Central Middlesex Hospital to Ealing was an additional source of concern to respondents. Brent commented that patients were drawn overwhelmingly from its area, and that Brent Social Services Department co-operated closely with Parkside Health Authority in providing social work support at the hospital. The North West Thames Regional Health Authority also opposed the transfer of the hospital to Ealing. Neither the
Central Middlesex Hospital Trust nor Parkside Health Authority commented directly to us. However, the latter was quoted by Brent as questioning whether the hospital's interests would be served by having Ealing as the sole planning authority. Mr Paul Boateng MP expressed concern that provision of care for the elderly would suffer if our draft proposal were implemented.

131. Ealing supported the proposed unification of Park Royal in its area, as did nine other respondents. Ealing Labour Party and Mr Michael Elliott MEP believed that our draft proposal would facilitate the regeneration of Park Royal, while agents for Heinz Ltd. suggested that uniting the area in one authority would lead to greater efficiency and simplicity in the planning process. Mr Harry Greenway MP expressed doubts over the strength of the connection between the Central Middlesex Hospital and surrounding neighbourhoods in Brent, and supported the hospital's transfer to Ealing. A Brent councillor suggested a realignment along the Grand Union Canal between the North Circular Road and the existing boundary at Willesden Power Station, so transferring the hospital and the larger part of Park Royal to Ealing.

132. Both Ealing and the Ealing Labour Party objected to the proposed transfer to Brent of the Freightliner Terminal at Willesden Junction. The Council commented that it had been involved in developing part of the site as a depot for Channel Tunnel traffic. The Ealing Labour Party commented that vehicular access to the terminal site was from Ealing. The transfer of the terminal was, however, supported by the Jubilee and Bakerloo Lines Users' Committee.

133. The West Twyford Residents' Association supported our draft proposal, on the grounds that it would unite West Twyford in Ealing. Several other respondents, including the Ealing Labour Party, also considered that this community should be united in one authority. The Brent Labour Party Local Government Committee suggested that this could best be achieved by transferring Abbeyfields Close and Moyne Place to Ealing. A member of the public suggested a realignment north along the River Brent as far as the Grand Union Canal, south-east along the canal to a point due north of Rainsford Road, and then south and west along the
rear curtilages of properties in Moyne Place and Abbeyfields Close, to rejoin the existing boundary in Twyford Abbey Road.

134. Having considered the response to our draft proposal, we remained doubtful that the current three-way split of Park Royal was in the long-term best interests of the industrial estate; we considered that, in purely planning terms, there was a case for uniting the estate within one authority. Nevertheless, it was clear to us that Brent has close, and mutually beneficial, contact with business and industrial concerns in Park Royal. These contacts extend into the education and training spheres, and appear to be of particular value to an area such as south Brent, which has suffered from high unemployment. Moreover, Brent argued persuasively that the current multi-agency and multi-borough approach to planning matters functions effectively, and that to disrupt existing arrangements would set back redevelopment.

135. We accepted that the Central Middlesex Hospital, in spite of its N.H.S. Trust status, had close links with the Parkside Health Authority and Brent's Social Services Department, and that its transfer to Ealing might have a detrimental effect on health care provision in Brent.

136. The information received in response to our draft proposals letter suggested, on balance, that major change in the Park Royal area would be inappropriate at this time. We have therefore decided not to confirm our draft proposal in full, but to consider instead the options for more limited changes which would unite communities and rectify defacements in the existing boundary.

137. We took the view that West Twyford should be united in Ealing, on the grounds that this area has close community ties with Ealing, and has better access from that Borough. Accordingly, we have decided to adopt as our final proposal a suggestion from a member of the public, to transfer Elvedon Place, Elvedon Road, Moyne Place and Abbeyfields Close from Brent to Ealing, by a realignment along the River Brent, the centre of
the Grand Union Canal and part of the northern perimeter of the Guinness estate.

138. We considered Guinness' suggestion that an area of land between Coronation Road and the Western Avenue should be united with the major part of its estate in Brent. However, we noted that this land - although owned by Guinness - was covered largely in railway tracks, and we could see no justification in terms of effective and convenient local government for transferring it to Brent.

139. In order to rectify anomalies in Coronation Road and Acton Lane, we have decided to adopt as part of our final proposal a realignment along the rear curtilage of the former British Rail freight depot in Coronation Road, and along the northern curtilage of Acton Lane as far as the line of our draft proposal at the Watford-Euston railway. East of this point, we considered that, as the Freightliner Terminal at Willesden Junction was operationally linked to the railway system, it should be in the same authority - Brent - as the sidings to the north. Accordingly, we have decided to confirm as final that part of our draft proposal running east from Acton Lane to the boundary between Ealing and Hammersmith and Fulham.

BRENT'S BOUNDARIES WITH HAMMERSMITH AND FULHAM AND THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA

140. In response to our letter of 31 July, Westminster Council Conservative Group submitted a new suggestion to realign Brent's southern boundary to the Grand Union Canal, between the Old Oak railway sidings and Ladbroke Grove. It described the Grand Union as a natural boundary. The effect of the suggestion would have been to transfer to Brent an industrial estate, two cemeteries and residential areas at College Park and Kensal Rise.

141. Whilst acknowledging that the canal was one of a number significant physical features running east-west through this area, we had no evidence to suggest that its use as a boundary in this area would result in more effective and convenient local
government. We have therefore decided not to pursue the Conservative Group's suggestion.

**BRENT'S BOUNDARY WITH HAMMERSMITH AND FULHAM**

**College Park**

**Draft Proposal**

142. Brent suggested the transfer to its area of some residential and industrial property located south of the Harrow Road. Hammersmith and Fulham suggested using a side of road realignment in Harrow Road. It also submitted a minor suggestion to clarify the boundary in the vicinity of Willesden Junction.

143. We doubted whether these minor realignments would address the essential arbitrariness of the existing boundary, which did not appear to reflect patterns of communities in this area. We observed that College Park is separated from other residential areas in Hammersmith and Fulham by a number of divisive features, including the Watford to Euston and Ealing to Paddington railway lines, St. Mary's Cemetery, the Grand Union Canal and Wormwood Scrubs. This contrasted with College Park's proximity to residential and shopping areas in Brent, such as Harlesden. We felt that, in view of its geographical position, College Park could be more effectively and conveniently administered from Brent. Accordingly, we decided to adopt as our draft proposal a realignment along the Watford to Euston railway line, thereby transferring College Park to Brent.

**Final Proposal**

144. Brent supported our draft proposal, as did a Brent councillor and a member of the public. However, it was strongly opposed by Hammersmith and Fulham. We also received 77 representations from College Park residents, a petition containing 554 signatures, and 21 letters from pupils of Kenmont Primary School, all opposing our draft proposal.

145. Although many respondents acknowledged that College Park is physically separate from other residential areas in Hammersmith and Fulham, they denied that this had caused problems in terms
of service provision. Some suggested that Hammersmith and Fulham Council had gone to considerable lengths to integrate the area into the Borough, in order to compensate for its apparent isolation.

146. Hammersmith and Fulham was widely perceived as an efficient authority. The regularity and efficiency of refuse collections and highway maintenance appeared to be especially appreciated by local residents, many of whom feared that services would deteriorate under Brent. The College Park Action Committee mentioned that Hammersmith and Fulham had provided a mobile library and a community centre; in addition, traffic calming measures had been instituted, and funding made available for a summer festival. A number of local businesses also commented favourably on Hammersmith and Fulham's record as a provider of services.

147. Several respondents claimed that College Park is well-connected to Hammersmith and Fulham. They pointed out that administrative facilities in Hammersmith are more easily accessible than those in Wembley, while Hammersmith and Fulham noted that the A219 Scrubs Lane provides a fast link between College Park and centres to the south. A view commonly expressed was that the Harrow Road, to the north of College Park, is a far more effective impediment to movement than the railway lines, the Grand Union Canal or Wormwood Scrubs. The Hammersmith Labour Party and a local firm suggested that the boundary should follow the Harrow Road and the rear of properties in Tubbs Road, as far as the existing boundary at Old Oak Lane.

148. Nearly all respondents claimed to identify strongly with Hammersmith and Fulham, and to have few connections with areas north of the Harrow Road. Several feared that our draft proposal would sever long-standing community links. The Governors of Kenmont Primary School were concerned about possible disruption to education services, and pointed out that pupils used sports and educational facilities in White City and Hammersmith. The College Park Action Committee commented that some residents of College Park were employed on the industrial estate to the south of the Watford-Euston railway line.
149. Hammersmith and Fulham, having conducted an opinion survey of local residents, concluded that these residents valued their links with Hammersmith, and believed that a transfer to Brent would bring disadvantages in terms of effective and convenient local government. The College Park Action Committee noted that our draft proposal would leave within Hammersmith and Fulham a row of terraced cottages adjoining St. Mary's cemetery; it questioned whether the interests of effective and convenient local government would be served by dividing these few properties from College Park.

150. We acknowledged the strength of local residents' opposition to our draft proposal; approximately 50% of residents signed the petition opposing our draft proposal, and Hammersmith Council's survey appeared to show a similarly high proportion of households to be against major change. We accepted that College Park was unusually self-contained for an inner London community, and that it could be said to have a distinct identity. However, it seemed to us that its case for remaining separate from Brent derived in part from the apparent barrier effect of the Harrow Road. We doubted whether the Harrow Road was in practice such a significant barrier. Although the road is a through-route, it is only single-lane at College Park, and a pelican crossing has been installed.

151. We addressed the question of the terraced cottages in Scrubs Lane, which would remain in Hammersmith and Fulham if our final proposal were implemented. We noted that the cottages were adjacent to a trading estate which would continue to require servicing by Hammersmith and Fulham. Although the cottages would be isolated from other residential development, there were no grounds for supposing that they would suffer, in terms of service provision, if College Park were transferred to Brent. We also considered a suggestion from a member of the public that St. Mary's Roman Catholic Cemetery be transferred to Brent along with College Park. It was argued in favour of this suggestion that the church to which the cemetery was linked was situated in Brent, and that that Borough would be more committed to the upkeep of the cemetery. We doubted the validity of this last point, noting that Hammersmith and Fulham had designated the cemetery a
conservation area. Moreover, the change would not in our view enhance the provision of local government services.

152. In reviewing our draft proposal, we were conscious of the points raised in paragraph 26 above - in particular, we bore in mind that the wishes of the people are only one of the factors which we must consider. We acknowledged the strength of feeling expressed by the considerable number of College Park residents who made their views known to us, but we had also to consider the pattern of community life and the effective operation of local authority services. Notwithstanding the views of local residents, we concluded that College Park has natural affinities with Brent. We realise that most local authorities are resourceful in overcoming problems caused by boundary anomalies, and we accept that Hammersmith and Fulham may not in practice be experiencing difficulties in providing services to College Park. Nevertheless, the distance between College Park and the nearest centres in Hammersmith and Fulham is considerable; and there is a range of prominent physical features - most notably the Grand Union Canal, two mainline railway lines, a cemetery and a sizeable area of open land - which isolate the neighbourhood from communities to the south. Taken together, these facts argue strongly that local authority services could in the long run be more effectively and conveniently provided by Brent. Accordingly, we have decided to confirm our draft proposal as final.

BRENT'S BOUNDARY WITH KENSINGTON AND CHELSEA

Draft Proposal

153. Brent made no suggestions for change to this boundary. However, Kensington and Chelsea suggested realigning the boundary along the Grand Union Canal, thereby transferring Kensal Green Cemetery to Brent. We considered that the Watford-Euston railway line would generally provide a more suitable boundary along Brent's southern boundary. However, in the area of the Kensal Green Tunnels, where adherence to the railway line was not viable, we decided to adopt a line which would unite all the properties in Alma Place, and those on the southern side of Harrow Road, in Brent. We considered that these properties could
be more effectively and conveniently administered by that Borough.

Final Proposal

154. Brent supported our draft proposal. However, it was opposed by Kensington and Chelsea, on the grounds that it would lose planning control over land bordering Kensal Green Cemetery. A member of the public suggested the transfer of Kensal Green Cemetery to Westminster, partly in order to eliminate the three-borough split at the junction of the Harrow Road and Ladbroke Grove. In his judgement, this had been largely to blame for such problems as traffic congestion and inadequate road maintenance. He believed that unified responsibility for the junction and the surrounding residential area would benefit the local environment.

155. We reaffirmed our view that the properties fronting the Harrow Road look to Brent, and appear to have no community of interest with other commercial and residential areas in Kensington and Chelsea. We had no reason to suppose that the setting of the cemetery would be damaged by possible development along the Harrow Road, as Kensington and Chelsea had suggested. As regards the Harrow Road/Ladbroke Grove junction, we took the view that only minor realignments were necessary in this area. (We have consulted on these realignments in the context of our review of the City of Westminster's boundary with Kensington and Chelsea). Accordingly, we have decided to confirm as final our draft proposal for the boundary between Brent and Kensington and Chelsea.

BRENT'S BOUNDARY WITH WESTMINSTER

Kensal Triangle/South Kilburn

Draft Proposal

156. Brent suggested a side of road realignment along a short stretch of Shirland Road, in order to resolve the problem of divided properties. The City of Westminster also suggested a minor change at Shirland Road, the effect of which would have
been to transfer seven properties from Brent to Westminster. The Westminster Labour Party suggested that the entire boundary between Brent and Westminster should be realigned along the Watford to Euston railway, on the grounds that the residential areas that would be transferred have restricted access from Brent and look to Westminster for amenities and services. The Westminster Labour Party considered that the existing boundary was not conducive to the effective delivery of local government services.

157. We considered that the existing boundary between Brent and Westminster divides communities around Kensal Green and West and South Kilburn, and warrants realignment in order more accurately to reflect the pattern of community and service links in the area. We noted that residential communities are isolated between the Watford-Euston line and the boundary with Westminster, and concluded that local government services to these areas could be more effectively provided from Westminster.

158. Accordingly, in order to provide a clearly identifiable boundary which reflected the pattern of communities in the area, we decided to adopt the Watford-Euston line between Willesden Junction and the Edgware Road as our draft proposal for the boundary between Brent and the City of Westminster, as suggested by the Westminster Labour Party.

Final Proposal

159. We received 21 representations in support of our draft proposal, and 22 objections. A petition of 13 signatures was submitted in opposition to our draft proposal and another, containing 51 signatures, supported the unification in Westminster of the Tollgate Gardens Estate, to the south of Oxford Road.

160. Brent supported a realignment along the Watford-Euston railway line, which it regarded as a major structural barrier. Our draft proposal was also supported by the Brent East Conservative Association and by a Brent councillor, who agreed that our alignment reflected the pattern of communities in the
South Kilburn area. Ten residents of the Kensal Triangle (i.e. the area bounded by the Harrow Road, Chamberlayne Road and the railway) argued that the quality and level of service provision—in particular refuse collection—would improve if the Triangle were transferred to Westminster. They added that, in their view, the Kensal Triangle had strong links with Westminster. Several residents of Oxford Road, and the adjoining Tollgate Gardens Estate, expressed the view that their neighbourhood looked to Westminster, and provided details of their dependence on services and facilities provided by that Borough. They commented that the pattern of public transport provision reinforced these links to the south.

161. Another member of the public, while supporting our draft proposal, made the point that South Kilburn and the Kensal Triangle are distinct neighbourhoods, with the latter being more closely connected to Westminster. Accordingly, he put forward an alternative, intermediate alignment, which followed the Watford-Euston railway only as far as Salusbury Road, and then followed Salusbury Road south to the existing boundary.

162. Westminster City Council, Mr Ken Livingstone MP, the Rt Hon Reginald Freeson, the Liberal Democrat and Labour Groups on Brent Council, a Brent councillor and Brent North Labour Party all opposed our draft proposal, and included the Central Policy Unit Report as part of their submissions. One of the Report's main reservations was that our draft proposal paid too little attention to community ties; it argued that the shops and other facilities located north of the railway line exert a considerable pull on South Kilburn, so that the railway itself cannot be said to delimit communities. It also drew attention to the presence in South Kilburn of a Council-owned annexe of the College of North West London, which caters largely for students living in Brent.

163. The Report also pointed out that South Kilburn contains the largest municipal housing estate in Brent, and that the majority of those living in South Kilburn are council tenants. These facts were noted by Westminster City Council, in support of its
argument that the draft proposal would cause needless disruption, and harm Brent by depleting its in-Borough housing stock.

164. In addition, the Report listed the services and facilities in South Kilburn which are organised or funded by Brent. These ranged from an Afro-Caribbean centre to a Home Care Service, which provides assistance to residents with physical disabilities or learning difficulties. Lastly, the Report mentioned the efforts being made by Brent to counter deprivation in South Kilburn, which has the Borough's highest unemployment rate. These socio-economic problems would, it argued, be compounded by our draft proposal, as Westminster is ineligible for Urban Programme funding. The Report pointed out that Brent has been able to use such funding to build premises for small businesses.

165. Brent Community Law Centre suggested that South Kilburn has strong historical links with areas north of the railway line. Westminster Council Conservative Group and Westminster North Conservative Association considered South Kilburn to be 'suburban' - in other words, different in character from areas of inner London, such as Westminster; in their view the Kensal Triangle also looks outwards, towards Harlesden.

166. Several respondents (including Westminster itself) doubted whether local government services could be more effectively provided from Westminster. They observed that Brent was heavily involved in South Kilburn, principally as a landlord. The Community Law Centre pointed out that if Brent continued to own and manage the South Kilburn Estate, tenants would pay rent to one local authority while receiving housing benefit from another. It regarded this as a recipe for confusion and inefficiency. On a broader point, the Community Law Centre also expressed concern that our draft proposal would divide responsibility for Kilburn High Road between three authorities.

167. Our proposal to remove the Kensal Triangle from Brent also attracted opposition. The Kensal Green Residents' Association reported that its members had no desire for change. A company based in this area was anxious to remain within the area covered by the North West London Training and Enterprise Council, from
which it received part of its funding. Another local organisation, the Neighbourhood Six Council, felt that the Kensal Triangle looked north to Kensal Green. This view was shared by Westminster and by the Westminster North Conservative Association; both commented that access to the Kensal Triangle from Westminster was limited, now that traffic calming devices had been installed.

168. Westminster disputed the need for anything more than minor realignments, to eliminate anomalies at Shirland Road. However, it suggested that if major change was deemed necessary, then parts of Westminster should be transferred to Brent. Specifically, it recommended an alignment along Walterton Road and the Grand Union Canal, which would have united West Kilburn and South Kilburn in Brent. This suggestion was supported by Westminster North Conservative Association, a member of the public and by Westminster Council Conservative Group, which also suggested an alignment along Kilburn Park Road as far as the boundary between Westminster and Camden. The Conservative Group argued that West Kilburn is essentially 'inner suburban' and, in socio-economic terms, has more in common with Kilburn proper than with areas to the south in Westminster.

169. The Leader of the Opposition on Westminster Council and the Saltram Area Residents' Association opposed this suggestion, as did Walterton and Elgin Community Homes Ltd, which pointed out that a realignment along Walterton Road would split a housing estate.

170. We reassessed our draft proposal in the light of all the information presented to us by respondents. We agreed that the area affected by our draft proposal covered two distinct areas. South Kilburn, to the east, is comprised largely of municipal housing, and contains numerous social services and community facilities which receive funding from Brent. By contrast, the area west of Salusbury Road appears to share the socio-economic characteristics of West Kilburn, and the response from local residents suggests that it has close community ties with Westminster.
171. By far the larger part of the Central Policy Unit Report was concerned with South Kilburn: all the facilities and services mentioned in the Report are located in this area, and the deprivation which Brent is seeking to remedy through Urban Programme funding is concentrated in the South Kilburn Estate. We were concerned that the loss of this sizeable housing estate might affect Brent Council's ability to discharge its statutory responsibilities towards the homeless. It seemed to us, on reconsideration, that South Kilburn has strong community ties with Brent, and that to transfer the area to Westminster would cause significant disruption, which would not be in the interests of effective and convenient local government.

172. Accordingly, we considered alternatives to our draft proposal, which would remedy defacements in the area of Malvern Road and Oxford Road and eliminate anomalies in the area of Kilburn Lane. We took the view that the minor suggestion put forward by Westminster, for a realignment at Shirland Road, would not address the fundamental defects of the existing boundary; nor could its major suggestion, involving the transfer of West Kilburn to Brent, be justified in terms of effective and convenient local government.

173. In order more accurately to reflect the differences between the Kensal Triangle and South Kilburn, we have decided to confirm as final that part of our draft proposal between the Kensal Green Tunnels and Salusbury Road, and to modify the remainder by realigning the boundary south along the centres of Salusbury Road, Malvern Road and Chippenham Gardens, rejoining the existing boundary in Kilburn Park Road. Further east, we have decided to realign the boundary to the centre of Oxford Road between Cambridge Gardens and the existing boundary between Brent and Camden, in order to unite the Tollgate Gardens Estate in Westminster. We consider that these alignments — the effect of which would be to retain South Kilburn in Brent but transfer the Kilburn Triangle to Westminster — would best reflect local communities of interest, and would accord with the expressed wishes of residents.
BRENT'S BOUNDARY WITH CAMDEN

Kilburn High Road

174. We noted that the existing boundary between Brent and Camden follows, in its entirety, the Edgware Road (A5). No suggestions were submitted to us for change in this area. The present boundary divides the shopping centre at Kilburn, but it has the merit of following a clearly defined and well-established feature. Accordingly, in the absence of any other more suitable alignment in this area, we took an interim decision to make no proposals for this boundary.

175. Neither Camden nor Brent expressed a view on our interim decision. The Jubilee and Bakerloo Lines Users' Committee supported our interim decision; it argued that the division of Kilburn High Road caused no problems in practice, as inter-borough maintenance agreements were in place. We have therefore decided to confirm our interim decision as final.

ELECTORAL CONSEQUENCES

176. When publishing our draft proposals, we invited suggestions for possible changes to electoral boundaries as a consequence of our proposed administrative boundary changes. We were concerned at that stage to avoid premature discussion of electoral consequences when it was already evident that the proposals themselves would be the subject of considerable further comment, which we would want to consider before formulating our final proposals. As yet, therefore, no proposals to deal with electoral consequences have been published. Having now formulated our final proposals for boundary changes, we have concluded that, in view of the nature and extent of the consequential changes to electoral arrangements which will be required, these ought to be advertised separately in order to give local authorities and residents affected by them a full opportunity to comment. We have accordingly decided that we should report to you now only on our final proposals for administrative boundary changes, as provided
for in section 51(1) of the 1972 Act. Our final proposals for consequential changes to electoral arrangements will be the subject of a separate report, which will be submitted to you in due course.

CONCLUSIONS

177. We believe that our final proposals, which are summarised in Annexes B and C to this report, are in the interests of effective and convenient local government and we commend them to you accordingly.

PUBLICATION

178. A separate letter is being sent to the London Boroughs of Brent, Barnet, Camden, Ealing, Hammersmith and Fulham, Harrow, the Royal Borough of Kensington and Chelsea and the City of Westminster, asking them to deposit copies of this report at their main offices for inspection for a period of six months. They are also being asked to put notices to that effect on public notice boards. Arrangements have been made for similar notices to be inserted in the local press. The text of the notice will explain that the Commission has fulfilled its statutory role in this matter and that it now falls to you to make an Order implementing the proposals, if you think fit, though not earlier than six weeks from the date on which our final proposals are submitted to you. Copies of this report, with the maps attached at Annex A illustrating the proposed changes, are being sent to all those who received our draft proposals letter of 31 July 1991, and to those who made written representations to us.
LOCAL GOVERNMENT BOUNDARY COMMISSION FOR ENGLAND

REVIEWS OF GREATER LONDON, THE LONDON BOROUGHS
AND THE CITY OF LONDON

BRENT LB

AFFECTING HARROW, EALING, HAMMERSMITH AND FULHAM,
KENSINGTON AND CHELSEA and CITY OF WESTMINSTER LBs

FINAL PROPOSALS

Produced by Ordnance Survey for the
Local Government Boundary Commission for England
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SUMMARY OF PROPOSED BOUNDARY CHANGES

Brent's boundary with Harrow

Area east of Honeypot Lane
Realignment to Stag Lane, De Havilland Road and rear curtilages of properties in Lawrence Crescent and Reynolds Drive

Northwick Park Hospital and Harrow College of Technology
Realignment to transfer Northwick Park Triangle, Northwick Park Hospital and Harrow College of Technology to Harrow

Brent's boundary with Ealing

Barham Ward
Realignment to Piccadilly Line as far as Bridgewater Road

Alperton
Realignment to Manor Farm Road

West Twyford/Park Royal
Realignment to transfer Abbeyfields development, works in Elvedon Road and site of goods depot in Coronation Road to Ealing. Realignment to northern curtilage of Acton Lane. Realignment to transfer freightliner terminal to Brent.

Brent's boundary with Hammersmith and Fulham

College Park
Realignment to Watford-Euston railway

Brent's boundary with Kensington and Chelsea

Kensal Green Tunnels
Realignment to rear of properties on south side of Harrow Road

Brent's boundary with Westminster

Kensal Triangle/South Kilburn
Realignment to transfer Kensal Triangle and adjoining residential area to Westminster, and to eliminate defacements in area of Malvern Road/Oxford Road