

GREATER LONDON AUTHORITY

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Department: Planning

Our reference: LDF04/LDD17/LP03/HA01
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By email: planningstrategy@brent.gov.uk

Dear Paul

**Statement of general conformity with the London Plan (Planning and Compulsory Purchase Act 2004, Section 24(4)(a) (as amended);
Greater London Authority Acts 1999 and 2007;
Town and Country Planning (Local Development) (England) Regulations 2012**

RE: Local Plan Regulation 19 consultation

Thank you for consulting the Mayor of London on the Brent Regulation 19 Draft Local Plan 2020-2035. As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have provided comments, which I endorse, and which are attached at Annex 1.

The Mayor provided comments on the earlier Direction of Travel consultation document on 3 January 2019 (Ref: LDF04/LDD17/LP02/HA01). This letter follows on from that earlier advice and sets out where you should make further amendments to be more in line with the emerging draft new London Plan.

The draft new London Plan

As you know, the Mayor published his draft new London Plan for consultation on 1st December 2017. The Consolidated Suggested Changes version of the draft London Plan was published on 16th July, and the Panel's report, including recommendations, was issued to the Mayor on 8 October 2019. Publication of the final version of the new London Plan is anticipated in Winter 2019/20, at which point it will form part of Brent's Development Plan and contain the most up-to-date policies.

Given the anticipated timetable for the adoption of Brent's Local Plan it will need to be in general conformity with the new London Plan.

The Mayor will publish his response to the Panel Report before the end of the year, including to the housing numbers. Should Brent and the Examination Inspector like a further response once the Mayor has published his Intend to publish version of the new London Plan, he would be

happy to send an update letter or set out a revised response through a Statement of Common Ground.

General

Brent's draft Local Plan embraces the Mayor's Good Growth Policies and he welcomes that these have formed the basis for the vision of the borough over the coming fifteen years and beyond. Brent builds on its status as London Borough of Culture 2020 in the draft Plan by reflecting the Mayor's ambition to develop strong and inclusive communities as the first of six elements of what constitutes good growth in Brent. This approach is welcome and aligns well with the draft new London Plan.

Chapter 3 of the draft Local Plan establishes the background context for Brent clearly and concisely and underpins the strategic direction of policies later on in the document and this logical and methodical approach is welcomed by the Mayor.

The draft Local Plan divides the borough into seven broad spatial areas, each with its own local context and character which the site allocations and proposed development principles respond to individually. This approach is welcomed by the Mayor and aligns with Good Growth Policy GG1 which seeks to build strong and inclusive communities through the setting of policies that respond to local circumstance. Through its place policies, Brent should set out its anticipated spatial distribution of growth. That is, for each area Brent should set out indicative capacities for residential, office and industrial uses based on the proposed site allocations to illustrate how much growth each area is expected to deliver. This would help to establish whether Brent is capable of meeting identified need over its plan period and if gaps are identified these can then be considered through alternative strategic approaches.

Brent's general approach to growth is also welcome, notwithstanding Brent's reluctance to implement the small housing sites target as set out in the draft new London Plan. This was raised as an issue of non-conformity in the Mayor's previous response to Brent's Regulation 18 consultation. The publication of the panel's report on the draft new London Plan, following examination, recommends that borough's small sites target be revised down by approximately two thirds. The Mayor's final proposed approach will be set out in his Intend to Publish version of the new London Plan.

The Mayor maintains his earlier position (Regulation 18 response) that as currently drafted, the draft Local Plan is not in conformity with the London Plan due to its failure to respond positively to being identified as a 'provide capacity' borough as set out in Table 6.2 of the draft new London Plan (and established in the Industrial Land Demand Study 2017, conducted on behalf of the GLA) and also due to the intention to diverge from Policy E7 of the draft new London Plan through the promotion of the co-location of non-industrial uses within Strategic Industrial Land (SIL) at Staples Corner and Northfields (East of Grand Union Canal). The methodology used in producing the West London Employment Land Review is also a matter of non-conformity and contention as it challenges a fundamental element of the new London Plan evidence base.

Housing

Brent sets out in draft Policy BH1 its intention to diverge from the draft new London Plan housing target of 29,150 and instead deliver 27,482 homes between 2019 and 2029. The Panel's Report following examination of the draft new London Plan was issued on 8 October and recommends that the small housing sites component of borough's housing targets be

revised down by approximately two thirds. The Panel Report means that the recommended housing target for Brent is 23,250 dwellings up to 2029.

While the outcome of this matter is yet to be determined it is recognised that Brent has arrived at its suggested housing target of 2,748 homes a year up to 2029 from its housing trajectory, which is included as an appendix.

Small Sites

It is noted that Brent is maintaining its challenge against the Mayor's approach to small housing sites, especially with regards to the presumption in favour of small housing development as set out in draft new London Plan Policy H2A. The London Plan Panel Report recommends the removal of Policy H2A of the draft London Plan. It is noted that Brent suggests at paragraph 6.2.39 that it is able to deliver approximately 370 new homes a year through small site developments whereas the Panel report recommends that Brent's small housing site target for the period 2019 to 2029 is reduced from 1,023 to 433 dwellings a year. As stated above, the Mayor will be happy to send out an updated letter or set out his approach on this matter through a Statement of Common Ground following the publication of his Intend to Publish version of the new London Plan.

Affordable Housing

The Mayor welcomes LB Brent's intention to follow the overall strategic target for the delivery of 50% affordable homes in accordance with the draft new London Plan and the intention to follow the Mayor's Threshold Approach as set out in Policy H6. However, Policy BH5 of the draft Local Plan should make it explicitly clear that it will apply the Mayor's 35% affordable threshold (50% on public sector land and where there is a net loss of industrial capacity) above which viability assessments will no longer be required to support residential development proposals and with early and late stage reviews for schemes that do not achieve the threshold.

Older Persons Housing

The Mayor welcomes recognition of the London Plan benchmark figure for 230 specialist older persons dwellings a year as set out in Table 4.4 of the draft new London Plan. It should be noted that this is, in fact, a benchmark figure and not a target and should be supplemented by local housing needs information to arrive at a more specific annual target for the area including data on the type and tenure required to meet established local need. Brent's current draft Policy BH8 requires developers to work together to deliver a minimum of 10% specialist older persons accommodation within all growth areas apart from South Kilburn. This approach is not in accordance with draft new London Plan Policy H15A and is not based on evidence of local need. Boroughs are expected to work positively and collaboratively with providers to identify sites which may be suitable for a range and variety of specialist older persons housing. Policy BH8 of Brent's draft Local Plan should be amended accordingly and suitable sites should be identified in Brent's site allocations.

Gypsy and Traveller needs

The Mayor welcomes recognition of the new definition of Gypsy and Traveller as set out in the draft new London Plan. Under this definition LB Brent has established a need for 90 additional pitches over the plan period and would require approximately three hectares of land to meet that need. Through its site allocations, Brent should actively plan for Gypsies and Travellers needs by identifying suitable sites for the delivery of new pitches and/or by working collaboratively with neighbouring boroughs. Mayoral funding is available through the Homes for Londoners Affordable Homes Programme for the provision of new pitches on a single or multi-

borough basis. The Mayor welcomes Brent's intention to require consideration of a sites ability to accommodate pitches on all development sites in excess of one hectare.

Tall Buildings

The Mayor welcomes that Brent has gone some way in defining what constitutes a 'tall building' in the draft Local Plan, setting out that this is either 6m above prevailing building heights or those which are 30m or higher. It is not clear when and where each of these definitions are to be applied and future amendments to Policy BD2 should make this explicitly clear to avoid confusion.

Policy BD2 also states that the draft Policies Map sets out the general building heights in identified 'Tall Building Zones'. While the policies map does identify 3 types of tall building zone: core, pinnacle and zone, it does not set out appropriate building heights in those locations. Conversely, the draft policy and supporting Local Plan text does not define what these three tall building zones represent. Therefore, the Mayor would expect these matters to be addressed through appropriate amendments to clarify Brent's intended approach more clearly.

Draft Policy BHC2 which seeks to protect views of Wembley Stadium is welcomed by the Mayor and these are illustrated on the proposed policies map. Recognition of draft new London Plan Policy HC4 is noted too. A key part of an identified view is the background and in order to follow Policy HC4 correctly this part of the views also needs to be illustrated clearly on the policies map or on a separate and more detailed map. Brent should consider providing more evidence on why it is important that these views are protected and what makes them significant at a local level. Such robust evidence will help to provide the basis from which to make decisions on development proposals.

Social Infrastructure

LB Brent's intention to protect and encourage social infrastructure is welcome and is in line with the draft new London Plan. As part of its evidence base, Brent has not conducted a social infrastructure needs assessment in accordance with draft new London Plan Policy S1. Essential social infrastructure needs, especially those for schools and healthcare should be established and opportunities for their delivery secured through site allocations in accordance with draft new London Plan Policies S2 and S3.

Affordable Workspace

Brent's intention to seek lower cost workspace as part of its economic approach is welcomed by the Mayor.

LB Brent should note the differences in the draft new London Plan regarding suitable business space (Policy E2) and affordable workspace (Policy E3). Suitable business space can include lower cost business space and should be provided as part of schemes which exceed 2,500m² or a lower locally evidenced threshold in accordance with draft new London Plan Policy E2.

Affordable Workspace, refers to workspace for a specific social, cultural or economic purpose as set out in draft new London Plan Policy E3. Affordable workspace of this nature should only be sought within specific locations or and secured through S106 agreements.

LB Brent should adopt an approach which sets out what type of workspaces and suitable business spaces it requires and where they are needed based on local and up to date evidence.

To avoid confusion Brent should consider using a different term to 'affordable workspace' unless it intends to amend Policy BE1 to reflect the approach set out in draft new London Plan

Policy E3. As currently drafted 'Affordable Workspace' in both the draft new London Plan and the draft Brent Local Plan have two different and conflicting meanings.

Industrial Land

West London Employment Land Review (WLELR)

Brent is basing its strategic approach to the management of its industrial land on the West London Employment Land Review (WLELR). This evidence does not follow the methodology used for the London Industrial Land Demand Study 2017 (ILDS) conducted on behalf of the GLA and which now forms a significant element of the London Plan evidence base. The WLELR identifies Brent as a 'retain capacity' borough as opposed to a 'provide capacity' one as set out in Table 6.2 of the draft new London Plan and established as part of the London ILDS 2017.

The Mayor considers that the WLELR is flawed for a number of reasons, the most critical one being the use of labour demand modelling to forecast land demand for warehousing. This approach is not considered to be an appropriate methodology for this activity in London and nationally (See Planning Practice Guidance (PPG) Paragraph: 031 Reference ID: 2a-031-20190722 <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>). Land demand for warehousing is more closely correlated with growth in the London economy and population rather than employment numbers and the WLELR therefore significantly under-estimates the likely land demand for this land use. A labour demand model has also been used to forecast future land requirements for transport needs and the Mayor considers that this is also more likely to be driven by population and economic growth.

The WLELR also lacks an assessment of the future land demands for waste and utilities which the Mayor considers to be an essential consideration given that these uses typically occupy industrial sites. The focus of the WLELR is limited only to a part of the Park Royal/Heathrow property market area whereas a broader property market approach would have yielded better results and a far better understanding of the dynamics of London's and the local industrial markets. The WLELR methodology results in a much lower/nil net demand figure.

The results of the WLELR represent a stark contrast to the findings of the London ILDS and the approach set out in the draft new London Plan. The WLELR suggests that two of the boroughs with the largest forecast need identified in the ILDS have stagnant demand for industrial space. However, the evidence underpinning the WLELR indicates very low vacancy/availability rates and some of the highest industrial rents in London. The study also establishes that there is less than a year of supply of industrial floorspace to meet recent rates of take-up. These factors would suggest that demand for industrial floorspace is high relative to supply.

The Mayor strongly encourages Brent to carry out a review that is more closely aligned to the methodology for the London ILDS 2017 and the PPG. This will be essential to inform the development of Brent's Local Plan.

The Panel supported the Mayor's methodology regarding industrial demand and supply and the Panel Report suggests that in quantitative terms the Mayor has underestimated demand and suggest that the London Plan should take a firmer stance on the protection and provision of industrial land over the London Plan period.

Brent Industrial Land Audit

The Mayor is pleased that Brent has conducted an Industrial Land Audit and while this is welcome, it does not follow the guidance set out in the Mayor's Practice note on Industrial Intensification through plan-led and masterplan approaches. The audit should contain information including, for example, on a site by site basis, existing plot ratios, occupancy and vacancy rates and land ownership among many others. The audit should provide the basis from which to determine where and how industrial uses could be intensified and if long term low vacancy rates are identified, how these sites might be improved.

While a masterplan approach may be suitable for individually designated employment areas, a 'provide capacity' borough can only feasibly do this within a wider borough-wide strategic framework that is able to balance gains and losses across the area to ensure that Brent is able to make considerable gains in meeting established industrial floorspace needs over the plan period. It follows that sites identified, through a rational and logical process, as suitable for intensification should clearly set out anticipated floorspace growth and when these are likely to be realised within the plan period. Suitable monitoring approaches should be explored to ensure that progress in meeting targets can be appropriately established.

Policy BE2 sets out the broad strategic approaches for the borough's designated industrial land. Staples Corner and Northfields (east of Grand Union Canal), both designated as Strategic Industrial Locations (SIL), are identified as suitable for co-location within the policy. This is not in conformity with draft new London Plan Policy E7 which does not allow for the co-location of non-industrial uses on SIL. SIL may be released for non-industrial uses, only where the remaining SIL has been intensified to offset any losses, resulting as a minimum, in no net loss of industrial floorspace. This must be made clear in any such policy approach. However, in Brent's case, it is likely additional capacity, most probably for B8 uses, would have to be delivered across the borough before SIL can be released for co-location. Given that the London Plan evidence suggests a demand for an additional 43ha of industrial capacity, Brent should firstly look at intensifying existing SIL and LSIS which may provide the greatest opportunities to increase B8 floorspace, followed by non-designated industrial sites and other land uses such as redundant retail parks.

To complicate matters, Northfields (east of Grand Union Canal), was granted outline planning permission in September 2018 which would result in the release of 9.16ha of industrial land currently designated as SIL. It is not clear exactly how much industrial floorspace will be re-provided as part of the proposal. The release of this land was granted permission after the publication and consultation of the draft new London Plan in December 2017 and as such the London ILDS 2017 does not take into account the loss of industrial land as a result of this planning permission. Depending on the extent of re-provision, there may be a need for the borough to secure further industrial capacity to make up for the loss of industrial land granted in this application, in order to meet local and strategic demand.

The need and demand for warehousing and logistics space is being driven by changes in consumer behaviour and the emergence of new business formats brought about by advances in technology and it is important that this is taken into consideration in Brent's Local Plan. LB Brent should reflect both the recently updated Planning Practice Guidance and the methodology employed in the GLA's Industrial Land Demand Study 2017 which recognise and respond positively to the changing business climate.

Brent has issued a borough-wide Article 4 Direction to remove permitted development rights for the conversion of light industrial uses to residential and this is welcomed by the Mayor so that

appropriate scrutiny can take place to ensure that the integrity of industrial sites can be maintained where this is appropriate.

Offices

The Brent Employment Land Demand Study from 2015 suggests that there will be additional demand for between 32,600m² and 52,350m² of B1a space up until 2029 and the London Office Policy Review 2017 projects a composite demand for 44,000m² of office space in Brent up to 2041. The relatively low projected demand for office floorspace set out above and in the absence of more up to date local evidence means that Brent should set out an overarching policy to support the provision or protection of existing office space in its town centres and within sustainable locations for growth. It is not clear how site allocations have been identified as suitable for office development and there is no policy to control how much and where it will be delivered over the plan period. The office guidelines set out in Table A1.1 of the draft new London Plan identifies Brent, Kilburn and Wembley Park town centres as having some potential for Office development and this should be reflected in Brent's draft Local Plan and site allocations. If Brent does intend to deliver a far greater quantum of office space, well in excess of established need, then Brent should have a strategy in place to create the right economic conditions for this to happen. The draft Local Plan contains no policies that set out a strategic approach to sustainably manage office development in Brent over the plan period.

The London Office Policy Review 2017 establishes that between 2013 and 2016 Brent lost more than 180,000m² of office space to residential uses primarily due to permitted development rights. In order to control the high levels of office to residential conversions without requiring planning permission, Brent has issued a borough-wide Article 4 Direction to remove those rights. The Mayor is supportive of this approach to enable Brent to manage its employment land and in particular to prevent the uncontrolled introduction of residential uses in industrial areas. The impacts of these losses in recent years – particularly for SMEs – should be understood and appropriate policies brought forward to ensure that appropriate quantities and types of business floorspace is brought forward.

Table 2.1 of the draft new London Plan sets out that the Wembley Opportunity Area should deliver in the region of 13,500 new jobs up until 2041. The draft Local Plan should set out how it intends to meet this indicative capacity over the plan period through its site allocations and in an overarching policy which releases office development from SIL and LSIS and focuses it within Wembley and the borough's other town centres.

Public Houses

According to the London Pubs Audit 2018 (London Datastore), Brent has lost 42% of its public houses between 2001 and 2017. Policy BE4 of Brent's draft Local Plan seeks to resist the development of new A4 uses including public houses. Instead, Brent's Local Plan should seek to protect those public houses that are of heritage, economic, social or cultural value and proposals for new public houses should be supported where these would stimulate town centres, cultural quarters and the night-time economy in accordance with draft new London Plan Policy HC7 and therefore draft Local Plan Policies BE4 and BE5 should be amended accordingly. Reference to the CAMRA Public House Viability Test at paragraph 6.5.39 is welcome and seeks to identify those public houses with local community value.

Transport

The Mayor welcomes that Brent are following the parking ratio for B1(a) uses as set out in the draft new London Plan. However, the proposed parking ratios for B1(c), B2 and B8 are

considered to be overly generous. All B1 uses should follow the parking standards set out in Table 10.4 of the draft new London Plan and the approach for B2 and B8 should be determined on their own merits.

Glossary

Locally Significant Industrial Sites (LSIS) – LSIS is primarily suitable for industrial uses and non-industrial uses should only be introduced as part of a plan-led or masterplan approach in accordance with draft new London Plan Policy E7 and the Mayor’s Practice note on industrial intensification through plan-led and masterplan approaches. See Policy E1 of the draft new London Plan.

Site allocations and place policies

Maps of the sub areas should be made clearer and annotated to identify individual site allocations. Local Viewing Corridors of Wembley Stadium should also be clearly illustrated on location plans and sub area maps.

LB Brent should consider making the Wembley Opportunity Area (OA) a sub area in its own right. The approach to growth and development in this location should be treated differently from other areas in Brent as it is of strategic importance for the whole of London. The draft new London Plan sets indicative capacity for Wembley OA to deliver 14,000 new homes and 13,500 new jobs up to 2041. The draft Local Plan should clearly identify and define the precise extent of the OA boundary and illustrate this on the borough’s policies map. Sites that lie within the OA boundary should be distinguished clearly from others in the site allocations. If the Wembley Growth Area corresponds to the London Plan’s Wembley OA this should be made clear in the draft Local Plan.

There should be a general proviso, or overarching policy which sets out that where sites have extant planning permissions which have not yet been started, should new planning applications come forward for those sites then new London Plan policies will apply as they are now a material consideration in determining planning applications: especially with regards to the protection and intensification of industrial land.

A summary table setting out anticipated quanta of housing, industrial and other uses for each sub area would be very welcome in order to illustrate the spatial distribution of development coming forward over the plan period, and to also establish that there is indicative capacity to meet need over the plan period.

Housing proposed on industrial (where there is a resulting net loss of industrial floorspace) and publicly owned land will be expected to deliver at least 50% affordable housing in accordance with draft new London Plan Policies H5 and H6.

Where existing industrial uses have been identified as part of site analyses, this should form the basis for establishing baseline data to underpin a borough-wide plan-led approach for the intensification of the borough’s industrial floorspace over the plan period to meet identified need. The Mayor expects Brent to adopt a plan-led approach to the intensification of industrial floorspace capacity in response to it being established as a ‘provide capacity’ borough as set out in Table 6.2 of the draft new London Plan. Brent’s Industrial Land Audit findings should feed directly into site allocations clearly setting out which sites are expected to increase industrial capacity, the nature of the industrial use (i.e. B1c, B2 and B8) and by how much.

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Table 1 - Brent Site Allocations

Allocation	Comment
BCSA5: Olympic Office Centre	The site lies within the Wembley OA. The site is within the Wembley town centre boundary and under the office guidelines as set out in Table A1.1 of the draft new London Plan is identified as a good location of office-led mixed-use development. This should be reflected in the allocation.
BCSA6: Watkin Road	The site lies within the Wembley OA. Should there be a new planning application prior to completion of the extant permission, the allocation should take note of draft new London Plan Policies E4 and E7. Proposals for new office space should be directed to the borough's town centres in accordance with draft new London Plan Policy E1 and especially Wembley Town Centre which is suitable for office-led mixed-use development.
BCSA9: First Way	'Brent should apply the principle of no net loss of industrial floorspace capacity through a process of intensification or co-location in accordance with policies E4 and E7 of the Draft New London Plan. Brent should increase industrial floorspace capacity on these sites beyond re-provide industrial floorspace capacity through a process of intensification in accordance with Draft New London Plan Policy E7. The introduction of residential uses within industrial areas will need to provide at least 50% affordable housing in accordance with draft new London Plan Policies H13C and H6. Those sites allocated for residential development in close proximity to industrial uses and especially those adjacent to Wembley Stadium will need to apply the agent of change principle in accordance with Draft New London Plan Policy D12.
Policy BP2 East	Staples Corner is designated Strategic Industrial Land (SIL) and as such should not be considered for residential development unless industrial intensification can lead to the release of some SIL to that end resulting in no overall net loss of industrial capacity in line with draft new London Plan Policy E7. Reprovision of industrial uses would need to be established before the release of SIL would be considered acceptable. In addition, as Brent is a 'provide capacity' borough it should seek to intensify industrial uses within SIL. Part m) requires more clarity so that it is clear that intensification of employment uses applies to B1c, B2 and B8 uses only (where priority is given to B2 and B8 uses). Part n) which talks about co-location should be removed as SIL is not suitable for co-location as set out in draft new London Plan Policy E7 unless SIL is released from its designation as mentioned above.
BEGA1: Neasden Stations Growth Area	The site furthest to the west is designated Strategic Industrial Land (SIL) and the northern-most site and the one to its south are Locally Significant Industrial Sites (LSIS). Designations should be illustrated on the site plan. The approaches to the intensification of industrial land are set out in Draft New London Plan policy E7 and the differing approaches set out for both types of designated industrial land should be followed. For example, co-location is not considered acceptable on designated SIL. In addition, as Brent is a 'provide capacity' borough it should seek to intensify industrial uses within SIL. A large part of the site lies within the Wembley OA and as such the OA boundary should be clearly defined. Part of the site is also a Site of Importance for Nature Conservation and this should be identified and draft new London Plan Policy G6 should be applied.
BEGA2: Staples Corner Growth Area	Staples Corner is designated SIL and as such Draft New London Plan policies E4, E5 and E7 apply and Brent should be seeking to intensify and enhance the industrial, storage and distribution functions of Staples Corner, and increase overall industrial capacity. The introduction of non-industrial uses through co-location would only be considered acceptable through a process of consolidation and intensification of industrial uses, leading to a release of some designated SIL without a net loss of industrial floorspace capacity and through prioritising B2 and B8 over other industrial uses. Reprovision of industrial uses would need to be established before release of SIL would be considered acceptable.

BESA1: Coombe Road	Much of the site is characterised by industrial uses and lies within the Wembley OA and both should be treated in accordance with the draft new London Plan. To the east, south and west the site is bounded by SINCs and directly south there is a conservation area. The proposed allocation for B1-B8 uses needs to be clarified so that it is clear that only B1(c), B2 and B8 uses would be acceptable in accordance with Policies E7 and E1 of the draft new London Plan. B1(a) uses should be directed to the boroughs town centres and already established office clusters. The need for office space over the plan period is very small and is estimated to be for only approximately 44,000m ² over the plan period as established in the London ILDS 2017.
BNSA1 Capitol Way Valley BSNA3: Queensway LSIS and Morrisons	The reconfiguration of LSIS should follow the approach set out in Draft New London Plan Policy E7. This means that reconfiguration of industrial uses within LSIS should be intensified to increase industrial floorspace capacity (or at the very least there should be no net loss). However, considering that Brent is a 'provide capacity' borough reconfigurations of this type should be aiming to increase industrial floorspace capacity contributing to a net gain across the whole borough over the plan period. Where BNSA1 overlaps with the Brent Cross/Cricklewood OA this should be made clear in the site plan.
BSSA7: Bridge Park and Unisys Building.	The site currently has an operational breakers yard which is an identified waste use. As such the site should be protected for its waste operations and if reprovided should be of equal size and operational capacity.
BNWGA1: Northwick Park Growth Area	The site is enclosed largely by Metropolitan Open Land (MOL). It should be noted that land swaps involving MOL are not supported or encouraged in the draft new London Plan. However, draft new London Plan Policy G3C states that any alterations to MOL boundary should be undertaken through the Local Plan process and not as part of planning applications. In this light, any intention to alter the MOL boundary should be included and set out clearly in the draft Local Plan and subjected to extensive consultation. Furthermore, exceptional circumstances will need to be established to underpin any intention for such alterations.
BSESA12: Wordsworth, Masefield and Part of South Kilburn Open Space	The site allocation boundary does not follow the pattern of the existing built form and if this is intentional it should be made clear. Both the wards of Kilburn and adjacent Queens Park are identified as being deficient in access to a nearby park in Brent's Open Space Assessment. While this site is part of a series of land swaps and allocation BSESA9 states that there will be no resulting overall loss of open space there is no evidence to suggest that this is the case. Furthermore, the reconfiguration of open space does not address the deficiency in access to nearby parks as established in the borough's recent Open Space, Sports and Recreation Study 2019.

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Next steps

I hope these comments inform the preparation of the Brent Local Plan. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact.



22 November 2019

Dear Sir/Madam,

Re: Brent Local Plan Pre Submission – October 2019

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments reflect TfL's role in implementing the Mayor's transport policies as set out in the London Plan and Mayor's Transport Strategy and as a transport operator and strategic highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL Commercial Development Planning (TfL Property) to reflect TfL's interests as a landowner and potential developer.

Thank you for giving Transport for London (TfL) the opportunity to comment on Brent Local Plan Pre Submission – October 2019. We have based our comments below on the document that provides the London Borough of Brent's response to TfL's comments submitted in January 2019 on the understanding that the proposed changes indicated in that document will be incorporated in the draft Local Plan prior to submission to the Planning Inspectorate for Examination in Public.

Since the previous round of consultation on Brent Local Plan, the draft London Plan has been subject to an Examination in Public and a consolidated version incorporating modifications was published in July 2019. The Panel Report into the draft London Plan has now been received and it is likely to proceed towards adoption in early 2020. Once adopted, the draft London Plan policies will become the strategic policy framework for assessing local policy and determining planning applications. It may therefore be necessary for an early review of some of the Brent Local Plan policies to be carried out to ensure that they are consistent with the new London Plan.

A key concern at the previous stage was the three site allocations that include operational bus garages. These sites are not in TfL ownership but they are very important in supporting the local bus network and their loss would be contrary to strategic policies on the retention of transport land.

Retention of existing bus garages is important because:

- They support the delivery of an effective bus service in the borough
- They create significant local employment and stable jobs
- A well located garage space is an essential feature of a low emission, affordable bus network
- TfL and the Mayor seek to protect bus garage capacity in London

Although the three bus garages have not been removed from the site allocations as suggested, we are pleased to note that more appropriate wording to ensure retention of bus garage capacity has been proposed which should address our concerns.

Although we are supportive of the broad approach to parking and car free development where this is in line with London Plan parking policies, TfL has concerns about the approach to other employment uses. The draft London Plan seeks to promote economic development that makes the fullest use of the public transport network, and encourages boroughs to support the growth of sustainably-located employment. This is particularly important given that workplaces generate a significant volume of regular trips during the peak hours of congestion. Every opportunity to reduce the proportion of these trips made by car – both through a development's location and design and through parking restraint – should be taken.

We note and welcome that B1a (offices) are now in line with the London Plan. However, the typical employee to floorspace ratios¹ for research and development (B1b, some of which is office-related) and light industrial (B1c) uses are over four times² lower than B1a (offices). This means that industrial uses in B1c, B2 and B8 use classes would be permitted a much higher ratio of parking per square metre of floor space, despite having much lower numbers of employees per square metre. TfL therefore requests that the parking policy defer to the standards in Table 10.4 of the draft London Plan for all B1 uses, which would still allow for higher parking provision at B1b/c than B1a. Policy T6.2 C in the draft London Plan allows for a different approach to parking for B2 and B8 uses, which is managed on a case-by-case basis.

¹ Section 4, Employment Density Guide, 3rd Edition, 2015

² 40-60 square metres per employee at B1b, 47 at B1c and 8-13 at B1a (net internal area)

The proposed standard of 1 space per 200 sq. m. applied to areas north of the Dudding Hill rail line in particular appears to be a rather crude boundary. This includes the Wembley Opportunity Area where good public transport connectivity and co-ordinated transport investment would justify a more restrictive approach. The potential reopening of the Dudding Hill rail line as part of the West London Orbital rail route would increase connectivity in this corridor. However, the differential parking standard could lead to an anomaly whereby areas immediately to the north of reopened stations would have a very different parking standard to areas immediately to the south, regardless of PTAL or proximity to stations.

At Reg. 18 we set out a number of detailed comments and proposed changes which you have responded to and so in the table below we indicate whether our points have been fully or partially addressed and if we seek any further changes.

We look forward to continuing our work together in drafting the final document. We are committed to continuing to work closely with GLA colleagues to help deliver integrated planning and make the case for continued investment in transport capacity and connectivity to unlock further development and support future growth.



Appendix A: Specific suggested edits and comments from TfL on Brent Local Plan Preferred Options – November 2018

Reg. 18 section	Reg. 18 track change/comment	Reg. 19 update
3.1.34 Spatial Portrait - Transport	It is stated that <i>'much investment is still needed to improve stations and their respective interchanges with other modes, but particularly to improve service frequency'</i> It would be helpful to identify which stations and services are priorities for investment, taking into account proposed site allocations. A list of priorities related to development proposals may help to secure developer, third party and match funding	No change has been made but it was only a helpful suggestion so no further change is required
BCSA7 Wembley Park Station	TfL Commercial Development Property has been working on proposals for residential-led mixed use development on land around the station, including Wembley Park station car park, which comprises the 'Wembley Park Station South' allocation. The Wembley Park Station North allocation does not form part of these proposals. Further comments on their development proposals are provided in the separate response prepared by TfL CD.	TfL CD to respond
BEGA1 Neasden Stations Growth Area	<p>TfL welcomes the safeguarding of land that is potentially required for the West London Orbital rail link together with development proposals that could maximise the opportunities for intensification in the Neasden station area should the rail link proceed. The West London Orbital rail link is included as a project in the draft London Plan and the Mayor's Transport Strategy but at this point there is no firm commitment to funding or delivery – this is recognised in the risks section.</p> <p>Development around the existing or proposed rail stations and close to rail infrastructure should take into account operational requirements and the potential need to provide mitigation for any impacts. Neasden station has a constrained ticket hall and stairways. Although there are no easy solutions or available funding, there may be a need to consider station improvements to accommodate development related demand.</p> <p>A bus/cycle/pedestrian link between Neasden Lane and Great Central Way within the Neasden Stations Growth Area could have big connectivity benefits but it could only be created in conjunction with development and so it should be mentioned as an aspiration in this site allocation</p>	<p>Comment only – no changes required</p> <p>We welcome the proposed changes although the wording could also refer to step free access being desirable – no further changes required by TfL</p> <p>We welcome the proposed changes – no further changes required by TfL</p>

Reg. 18 section	Reg. 18 track change/comment	Reg. 19 update
BEGA2 Staples Corner Growth Area	Due to the proximity to the North Circular Road any development must take account of the impacts on the operation of the Transport for London Road Network (TLRN) and its junctions. Vehicle access will need to be carefully considered. Although the current PTAL is 2 - 3, car free development should be considered to mitigate impacts and TfL would be happy to work with the borough to find ways to make this work e.g. car clubs, bus enhancements and cycling infrastructure	We welcome the proposed changes but suggest that they could be expanded as follows: 'The Council together with TfL will consider the extent to which the area can support car-free development and mitigate impacts through suitable improvements to public transport, active travel and measures to not adversely impact on neighbours' amenity of any potential parking displacement. There is a need to work with TfL and Barnet Council to provide improved links from the site to the proposed new station and wider Brent Cross regeneration area
BESA2 Cricklewood Bus Garage	Contrary to the wording, TfL has no ownership interests in Cricklewood bus garage although it is used by Metroline to provide TfL bus services. The site is believed to be in private ownership. However TfL would have strong objections to the loss of the operational bus facilities on site which are important in maintaining the local bus network and would resist the site's redevelopment as being contrary to the Mayor's policies on retention of operational transport land. Site constraints including limited access and the proximity to operational rail lines is likely to make its redevelopment problematic. TfL would recommend deletion of this proposed site allocation	Although the site allocation has been retained we welcome the proposed changes – no further changes required by TfL although the incorrect reference to Colindale AAP in the description of existing site should be removed
BNSA3 Queensbury LSIS and Morrisons	Development close to the rail station and rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts. Bus facilities located within the site will need to be retained and enhanced as part of any development and early engagement will be needed with TfL London Buses	We welcome the proposed changes – no further changes required by TfL

Reg. 18 section	Reg. 18 track change/comment	Reg. 19 update
BNWGA1 – Northwick Park Growth Area	TfL notes that Northwick Park station is included within the site allocation – TfL should be recognised in the list of landowners. TfL is working with Brent Council to increase capacity and introduce step free access at Northwick Park station (as referred to in North West Vision Transport (t) on page 114). The need for station improvements should be referenced under infrastructure requirements. Proposed development on the wider site would be expected to provide a significant contribution towards these works. TfL welcomes the intention to provide improved bus interchange facilities at the station including turning, standing and drivers facilities – again contributions towards these works will be required as part of the wider development	We welcome the proposed changes – no further changes required by TfL
BNWGA2 – Kenton Road Sainsbury’s	Taking into account the site PTAL, any car parking should be minimised, publicly available and designed to serve the wider town centre, consistent with the draft London Plan. Development close to the rail station and rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts	We welcome the proposed changes – no further changes required by TfL
South area - Transport	It is unclear what is meant in point u by ‘enhancing the setting of Harlesden Station and its connectivity to the surrounding area.’ TfL seeks confirmation that this involves improvements to wayfinding and the sense of arrival rather than any changes affecting the station structures or its operation Point w and 5.5.30 state that a key priority is to improve the connectivity between Old Oak and Harlesden through an enhanced Willesden Junction Station (including over-station development) and wayfinding. Reference should be made to co-operation with Network Rail as owners of the operational rail infrastructure well as TfL, OPDC, landowners, potential developers and community groups to achieve this	We welcome the proposed changes – no further changes required by TfL
BSSA7 – Willesden Bus Depot	As with Cricklewood bus garage site and contrary to the wording TfL has no ownership interests in Willesden bus depot although it is used by Metroline to provide TfL services. The site is believed to be in private ownership. However, TfL would have strong objections to the loss of the operational bus facilities on site which are important in maintaining the local bus network and would resist the site’s redevelopment as being contrary to the Mayor’s policies on retention of operational transport land. In TfL’s experience it is extremely difficult to come up with a viable development proposal, even on valuable sites that incorporates residential alongside continued use as an operational bus garage as suggested here. TfL would recommend deletion of this site allocation	Although the site allocation has been retained we welcome the proposed changes – no further changes required by TfL

Reg. 18 section	Reg. 18 track change/comment	Reg. 19 update
BSSA8 – Argenta House and Wembley Point	Development close to the rail station and rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts. In particular contributions would be expected towards potential capacity and step free access improvements at Stonebridge Park station that are needed to accommodate the cumulative impact of development related trips from this and other nearby sites including Northfields. Due to the proximity to the North Circular Road any development must take account of the impacts on the operation of the Transport for London Road Network (TLRN) and its junctions. Taking into account the site PTAL and proximity to Stonebridge Park station, TfL supports the concept of a car free development to ensure that negative impacts on road users are minimised	We welcome the proposed changes – no further changes required by TfL
BSSA9 - Bridge Park and Unisys Building	Development close to the rail station and rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts. In particular contributions would be expected towards potential capacity and step free access improvements at Stonebridge Park station that are needed to accommodate the cumulative impact of development related trips from this and other nearby sites including Northfields. Due to the proximity to the North Circular Road any development must take account of the impacts on the operation of the Transport for London Road Network (TLRN) and its junctions. Taking into account the site PTAL and proximity to Stonebridge Park station TfL supports the concept of a car free development to ensure that negative impacts on road users are minimised	We welcome the proposed changes – no further changes required by TfL

Reg. 18 section	Reg. 18 track change/comment	Reg. 19 update
BSWSA1 – Alperton Industrial Sites	<p>Alperton Bus Garage forms part of the northernmost site and is used by Metroline West to provide TfL services. The site is believed to be in private ownership. However, TfL would have strong objections to the loss of the operational bus facilities on site which are important in maintaining the local bus network and would resist the site’s redevelopment as being contrary to the Mayor’s policies on retention of operational transport land. The planning requirements should make it clear that an operational bus garage or equivalent of increased size needs to be retained on the site and that this may determine the nature of surrounding development. In TfL’s experience it is extremely difficult to come up with a viable development proposal, even on valuable sites that incorporates residential alongside continued use as an operational bus garage. TfL would recommend the removal of Alperton bus garage from this site allocation.</p> <p>Development close to the rail station and rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts. In particular contributions would be expected towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area</p>	Although the site allocation has been retained we welcome the proposed changes – no further changes required by TfL
BSWSA2 – Sainsbury’s, Alperton	<p>Glacier Way Bus Stand must be retained or enhanced as part of any development. This should be added as an infrastructure requirement. Early discussion should take place with TfL London Buses on this issue. Contributions would be expected towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area</p>	We welcome the proposed changes – no further changes required by TfL
BSWSA3 – Atlip Road	<p>Development close to rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts. In particular contributions would be expected towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area</p>	We welcome the proposed changes – no further changes required by TfL
BSWSA4 - Sunleigh Road	<p>Contributions would be expected towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area</p>	We welcome the proposed changes – no further changes required by TfL
BSWSA5 – Abbey Manufacturing Estate	<p>Contributions would be expected towards potential capacity and/or step free access improvements at Alperton station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the Alperton Growth Area</p>	We welcome the proposed changes – no further changes required by TfL

Reg. 18 section	Reg. 18 track change/comment	Reg. 19 update
BSWSA6 – Beresford Avenue	Contributions would be expected towards potential capacity and step free access improvements at Stonebridge Park station that are needed to accommodate the cumulative impact of development related trips from this and other nearby sites including Northfields	We welcome the proposed changes – no further changes required by TfL
BSWSA7 - Northfields	TfL has been involved in detailed discussions with the developers and has secured a package of mitigation that will make the development acceptable in transport terms. It is essential that this agreed mitigation package including contributions to improve the bus network, Stonebridge Park station and surrounding walking/cycling routes is carried forward when any subsequent planning applications are submitted	We welcome the proposed changes – no further changes required by TfL
BSWSA8 – Wembley High Road	Development close to rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts	We welcome the proposed changes – no further changes required by TfL
Policy BT1 – Sustainable Travel Choice and Appendix 4	TfL welcomes the emphasis on active travel and the application of Healthy Streets principles. The requirement for contributions towards cycle infrastructure and cycle parking that meets or exceeds minimum standards is welcomed. Although it is referenced in appendix 4, an explicit reference should be made here to the minimum cycle parking standards in the draft London Plan policy T5 and London Cycling Design Guidance. The wording of appendix 4 section 8.4.17 should make it clear the London Plan cycle parking standards in policy T5 are all minimum standards	We welcome the inclusion of the graphic showing how mode split targets will be met, as well as changes made in the Reg. 19 Plan that address TfL’s concerns. However the wording of policy BT1c should be clarified and require ‘cycle parking in line with or exceeding London Plan standards and TfL and Westrans design standards.’ Reference to London Plan standards is necessary to ensure that quantitative as well as qualitative standards are met. The text in paragraph 6.8.16 needs to be corrected to refer to cycle parking standards in London Plan policy T5 (not T6)
Policy BT1 – Sustainable Travel Choice	TfL welcomes support and safeguarding of land for the West London Orbital rail link here and elsewhere in the Local Plan. The West London Orbital rail link is a proposal in the draft London Plan and Mayor’s Transport Strategy. The project is still at the feasibility and development stage and so it will be dependent on securing a funding package and commitment from other stakeholders	No change required

Reg. 18 section	Reg. 18 track change/comment	Reg. 19 update
Policy BT1 – Sustainable Travel Choice	There should be a clear statement in this policy stating the need to protect infrastructure that is necessary to operate the rail and bus networks including bus stands, passenger and interchange facilities, drivers’ facilities and garages/depots. It should also promote the enhancement of existing facilities or construction of new infrastructure when required by proposed development	We accept the point that this policy requirement is in the London Plan and that with the proposed changes this has adequately been covered in site specific allocations
Policy BT1 – Sustainable Travel Choice and 6.8.17b	The policy should confirm that funding or physical works may be required as mitigation to address crowding or capacity concerns on the TfL network as a result of proposed development. Section 6.8.17b should be expanded to clarify that the type of public transport improvements that may need to be secured through planning obligations include station capacity or access improvements, contributions towards bus services, priority measures as well as new or improved passenger or operational transport infrastructure. The cumulative impact of planned and proposed developments in an area should be assessed when determining the need for and scale of mitigation	We accept the point that this policy requirement is in the London Plan and that with the proposed changes this has adequately been covered in site specific allocations. No further changes required by TfL
Policy BT2 – Parking and Car Free and Appendix 4	TfL welcomes the stronger encouragement of car free developments and the requirement to meet maximum parking standards in line with the draft London Plan policy T6.1 for residential and policy T6.3 for retail developments. Where CPZs are not already in place or where they require modification, developers should be required to contribute to these costs and assist implementation	We accept the point that adequate references to CPZs are made elsewhere in the document. No further changes required by TfL
Policy BT2 – Parking and Car Free and Appendix 4	The proposed employment parking standard of 1 space per 100 m2 of floor space for Opportunity/Growth Areas in appendix 4 section 8.4.2 table 1 is not consistent with the draft London Plan policy T6.2 which sets a maximum parking standard of 1 space per 600 m2 of floor space in designated Opportunity Areas in outer London. The draft London Plan policy recognises the greater potential to deliver transport solutions that support lower levels of parking and car use within designated Opportunity Areas. The advice in section 8.4.4 on the provision of more generous parking should be incorporated in 8.4.2 to make it clear that any provision above the Local Plan standards should always be within London Plan maximum standards.	We note that standards for B1a (offices) are now consistent with the London Plan. However, TfL has concerns about the approach to other employment uses, in particular the proposed standard of 1 space per 200 sq. m. applied to areas north of the Dudding Hill rail line. The covering letter provides more detail on this point
Policy BT3 – Freight and Servicing	TfL supports the requirement for road based freight transport to be minimised and the protection given to existing freight facilities. However this should go further in encouraging consolidation and promoting good practice, safety and technological innovation for both deliveries and construction transport, particularly in large development sites or on strategic routes in line with TfL guidance. The reference to the London Plan requirement for Construction Logistics Plans and Delivery and Servicing Plans in paragraph 6.8.25 is welcomed	We welcome the proposed changes – no further changes required by TfL

Reg. 18 section	Reg. 18 track change/comment	Reg. 19 update
Policy BT4 – Forming an access onto a road	TfL welcomes the restriction on forming an access onto the TLRN and London Distributor Roads	No change required
General point	For clarity Elizabeth line (as the name for the actual service) should be used consistently throughout the document rather than Crossrail (which refers to the construction project)	Correction made – no further changes required by TfL