



Planning Policy
Brent Council
Engineers Way
Wembley
HA9 0FJ

Date: 5th December 2019

By email: planningstrategy@brent.gov.uk

Dear Sir / Madam,

RE: Brent draft Local Plan Consultation (Regulation 19)

Thank you for providing the opportunity to comment on Brent's draft Local Plan (Regulation 19).

Please note that our representations below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a significant landowner in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.

TfL CD works to identify development opportunities throughout our landholdings and unlock underutilised land by pursuing innovative solutions to enable development on our sites. We are committed to providing exemplary development that will showcase the Mayor's objectives of providing good growth. TfL CD is a significant landowner in the borough and has identified a number of sites for residential-led, mixed use development which will make a significant contribution towards meeting borough and London-wide housing targets.

TfL CD has previously submitted representations on the Local Plan at the following stages of consultation:

- Call for Sites – April 2017;
- Brent Local Plan Reg. 18 Issues and Options – March 2018; and
- Preferred Options Local Plan – December 2018.

Our representations in respect of the current Regulation 19 draft Local Plan are set out below in accordance with your key topic headings and draft site allocations. In addition, we have reviewed officer comments (published within the summary of comments received, responses and proposed changes document which forms part of the evidence base to this consultation) which respond to TfL CD's previous representations to the Preferred Options Local Plan. Responses to these comments are provided where appropriate.

Chapter 4: Development Vision and Good Growth in Brent

TfL CD supports the principles of good growth set out within Chapter 4, including the desire



to prioritise development in new Growth Areas such as Neasden and continue to deliver development in areas such as Alperton and Wembley. We strongly support the principle of higher density development being encouraged in Brent's town centres and in areas with good accessibility to public transport, in line with Policy H1 of the Draft London Plan. The optimisation of sites, making efficient use of land, and the provision of higher density development will contribute to a significant increase in housing provision to meet the needs of the borough.

We broadly support Brent's approach to intensifying industrial land uses, including the co-location of industrial uses with residential where possible. Co-location is an opportunity to protect and intensify existing industrial land, whilst also contributing towards meeting identified housing needs through on-site residential development, promoting the most effective use of available land and driving innovation. However, we suggest that the strategy is clearer in its aim to intensify existing industrial land with SIL and LSIS designations to enable the release of more sustainable sites for other uses, such as residential.

Within our representations to the Preferred Options Local Plan, we requested that additional clarity was provided with regards to co-location and industrial land release within the Vision and Good Growth Strategy. Whilst we note that these topics are dealt with in the employment chapter and corresponding policies, further clarification would ensure a more positive policy framework and as such, we request that more detail is included within this section. We suggest the following wording is added to 'Growing a Good Economy' Paragraph 4.37 a) *"The London Plan is clear that industrial land should be managed through the Local Plan process. As a 'provide capacity' borough, Brent will establish a clear and structured approach to deliver industrial intensification and land release, where appropriate"*.

Chapter 4: Policy DMP1 Development Management General Policy

TfL CD remains generally supportive of the planning principles outlined within draft Policy DMP1 and appreciates the acknowledgement that *"development should provide the appropriate sustainable transport infrastructure"*, as noted in the Council's consultation statement.

However, Policy DMP1 part c) which states that development will be acceptable provided it is *"provided with the necessary physical and social infrastructure"* should specifically reference sustainable transport infrastructure to ensure that developments located in areas well served by public transport are prioritised. The policy should also stipulate that *"necessary infrastructure"* refers to both existing and planned infrastructure to ensure that housing delivery is optimised on all suitable and available sites, throughout the plan period. These changes to the policy wording are required to ensure that draft Policy DMP1 is compliant with Draft London Plan Policy H1 2a and is effective.

Chapter 5.1: Central Place – Draft Policy BP1

TfL CD continues to support the provisions set out in Parts (d) and (e) of draft Policy BP1 in support of residential-led mixed use development within the Wembley Growth Area, together with intensification and the provision of higher residential densities around Wembley Park Station. This is a highly sustainable location with excellent public transport accessibility and residential densities should be maximised accordingly.

Within our representations to the Preferred Options Local Plan, we proposed that the town



centre boundary should be extended westwards to incorporate the existing Wembley Park Station car park. Despite this, the boundary has not been extended.

We believe that it is appropriate to extend the town centre boundary to include Wembley Park Station for the following reasons:

- This site presents a prime opportunity for significant residential-led mixed use development, which shall sustain Wembley's role as the principal town centre within Brent whilst delivering a significant number of new homes.
- This site has a high PTAL ranging from 4 to 6a and development would take full advantage of the area's good access to public transport in accordance with draft Policy GG2 of the new London Plan.
- This site is located adjacent to Wembley Park station and will benefit from the development under the allocation BCSA7 Wembley Park Station, as set out below, contributing to the regeneration of the town centre area surrounding Wembley Stadium.
- Development of this site under BCSA7 will positively contribute to the vitality and viability of the town centre, helping to make Wembley town centre the main focus for the borough.

Given the above, as currently drafted, Policy BP1 is contradictory. On one hand, intensification and the provision of higher residential densities around Wembley Park Station, where development would benefit from good public transport accessibility, is supported. On the other hand, by not including Wembley Station Car Park within the town centre boundary, the policy is unduly restricting the development potential of this highly accessible site, which is ideal for optimised residential-led, mixed use development which would also improve the town centre. Therefore, the Wembley town centre boundary should be extended to include Wembley Park Station car park. This change is necessary if the draft Plan is to be considered positively prepared, justified and consistent with Draft London Plan Policies including H1 Increasing Housing Supply, NPPF Chapter 11 and NPPF paragraph 85.

Chapter 5.1: Central Place Site Allocations, Policy BCSA7: Wembley Park Station (North and South)

TfL CD continues to welcome the allocation of Wembley Park Station car park under allocation BCSA7. However, we note that the allocated use now states, "*Mixed-use residential-led development to include replacement of the existing office space*". Reference to replacing the existing office space was not included in the Regulation 18 draft Site Allocation and we consider it to be unnecessarily prescriptive. We therefore request that it is removed and the allocated use reverts to reading "*Mixed-use residential-led development*".

This allocation contains two sites: both north and south of the underground lines. The character of these sites differs and they are very likely to come forward for development separately. Although it is acknowledged that the draft Site Allocation BCSA7 differentiates between the two sites, for clarity we request that they are given separate site allocations within the draft Local Plan. We suggest that the southern site is renamed "Wembley Park Station Car Park" and that the northern site is named "Wembley Park Sidings".

The Southern Site (Wembley Park Station Car Park)

As stated within our representations to the Preferred Options Local Plan, TfL CD supports



the allocation for mixed-use residential-led development on the southern site. However, on the basis of emerging development being brought forward as part of a joint venture between Barratt London and Transport for London, which is currently the subject of pre-application discussions, we recommend that the indicative capacity should be amended to circa 450 homes (increased from 300 as currently stated in the draft Site Allocation). This would provide greater flexibility, ensure that development proposals make the most efficient use of land, and support development in optimising the capacity of the site in line with Draft London Plan Policy D1B.

It is anticipated that development on the Southern Wembley Park Station site could be delivered within five years. Accordingly, the delivery timeframe should be amended to accurately reflect the site's capacity for development. The proposed change is required to ensure that the Local Plan is positively prepared, justified and supports the ongoing pre-application discussions between Brent and TfL CD and Barratt London.

The design principles within the draft site allocation states that buildings of 10 storeys would be acceptable to the west of the site, subject to consideration of protected views of the stadium, "*stepping up slightly directly adjacent to the station*". The current design principles represent a missed opportunity to optimise the development potential of the site for housing delivery. There are opportunities for taller buildings to be delivered, especially on the eastern part of the site which is immediately adjacent to a key transport hub, on the edge of the existing town centre boundary and near existing buildings of height within close proximity of Wembley Park station and stadium (including the Premier Inn building that is the equivalent of 11 residential storeys). It would also complement the existing height in the wider area and serve as a 'way-finder' building, signalling the station from Wembley Stadium along Olympic Way. Also, as the site is located in the vicinity of a core concentration of tall buildings to the east, it is not considered that tall buildings in this location would be incongruous within the wider setting.

TfL and Barratt London's emerging development proposal for the site includes an appropriate massing strategy of increasing scale towards the station and Wembley masterplan (east) and the sympathetic stepping down of height towards the street (south). This strategy accurately reflects the site's surrounding context and capacity of the eastern portion for buildings of greater height. It is also noted that the houses to the south of Brook Avenue, which currently provide a lower density context to the south of the site, are allocated under draft BCSA3 for a range of uses anticipated to come forward at higher densities, which will alter the surrounding context.

Given the above, as currently drafted, the design principles of draft site allocation BCSA7 are not justified and would unduly restrict the development potential of the site. The design principles also fail to reflect the development aspirations of the borough, the GLA and TfL CD for the site. We therefore recommend that the words "*slightly*" and "*directly*" are removed under design principles to read "*stepping up ~~slightly directly~~ adjacent to the station*". This amendment would ensure that the site is developed to its optimum density, in line with Draft London Plan Policy D1B.

The allocation also requires active frontages to be provided along Brook Avenue. Within our representations to the Preferred Options Local Plan we stated that, given the nature of proposals for the site, which are residential-led and incorporate TfL operational buildings, this text should clearly state that ground floor activity may be residential, such as front doors on to the street. Whilst we appreciate that the draft Local Plan does not specify that these



frontages should be commercial, for clarity the policy should explicitly acknowledge the likelihood of them to be residential.

For the reasons outlined above, TfL CD requests that this site is included within the Wembley Park town centre boundary.

The Northern Site (Wembley Park Sidings)

The design principles state that the Northern Site *“will be developed at a lower density than that currently opposite to the south of the railway on Matthews Close”*, resulting in buildings that *“may step up to four or five storeys”*. The Northern Site is referenced in the draft Site Allocation as not being *“suitable for tall buildings of a significant scale”*. Within our representations to the Preferred Options Local Plan, we recommended that the wording relating to height should be more flexible to ensure that development proposals make the most efficient use of land, are developed at optimum densities in line with Draft London Plan Policy D1B and reflect the wider context, including the height of new and proposed residential development to the south. However, the Council’s consultation statement notes that *“in the absence of a detailed scheme with associated evidence base which might indicate that some increase in height above the 4-5 storeys currently identified in the policy is acceptable, the current parameters are deemed appropriate”*. This draft Policy is overly restrictive and is a missed opportunity to optimise the development potential of an under utilised brownfield site, located in the Wembley Growth Area with a predominant PTAL of 4.

The draft Site Allocation proposes an indicative capacity of 100 dwellings for the Northern Site. With an area of 0.7 ha, this represents a density of 142 dwellings per hectare. Given that this is an under utilised brownfield site, located in the Wembley Growth Area with a predominant PTAL of 4, this housing density is unjustifiably low. As such, the indicative capacity should be significantly increased to accurately reflect its development potential. Furthermore, this is a complex site and considerable levels of infrastructure works would be required to bring forward development. As such, initial assessments indicate that in order for viable development to come forward, a significantly higher capacity is required and the draft Site Allocation should be amended accordingly.

Chapter 5.2 East Place – Policy BP2

TfL CD remains supportive of the focus for new housing in the Neasden Stations Growth Area and the provision for tall buildings in these areas under Policy BP2. We support the addition of Neasden Town Centre to BP2 Criterion c), as noted in the Councils consultation statement.

Part (d) of this policy limits building heights to no more than two storeys above prevailing heights for development in locations where *“designated heritage assets will not be adversely impacted”*. We believe that a limitation on building height of no higher than two storeys is unnecessarily restrictive. This threshold may inhibit development heights in locations suitable for higher density development, taking into account the requirements set out in Draft London Plan Policy D1B. We therefore request that a more flexible approach is adopted to determine development heights, encouraging them to be considered on a case by case basis using a design-led approach.



Chapter 5.2: East Place Site Allocations, Policy BEGA1 Neasden Stations Growth Area

TfL CD continues to welcome the allocation of Neasden Station Car Park, BEGA1. However, unlike a number of the other sites within the BEGA1 site allocation, this site has no current industrial designations. Therefore, in our representations to the Preferred Options Local Plan, we strongly recommended that the site comes forward for residential development and this be supported by the site allocation. Whilst we note that Brent is a 'provide capacity' borough in terms of industrial capacity, this should not preclude the redevelopment of appropriate sites, such as Neasden Station Car Park, for much needed residential uses. Having a clearer strategy which provides adequate capacity for industrial intensification will allow other sites, such as Neasden Station Car Park, to be appropriately developed through co-location with residential uses. As stated in the Draft London Plan Policy E4 Paragraph 6.4.5 "The principle of no net loss of floor space capacity does *not apply to sites previously used for utilities infrastructure or land for transport functions which are no longer required.*"

Furthermore, the Draft London Plan sets Brent a 10 year housing target of 29,150, a significant increase from the target of 15,253 stated in the current London Plan – it is clear that Brent should be taking every opportunity to optimise appropriate sites for residential development whilst also meeting their target as a 'provide capacity' borough to deliver approximately 43ha of industrial floor space by 2041. In this case, the existing industrial locations within Site Allocation BEGA1 are deemed more suitable for additional industrial capacity, given their current uses and industrial designations, and Neasden Station Car Park should be allocated for residential development. As detailed within our 2017 Call for Sites submission, this site could provide approximately 70 new homes and this would be in line with Draft London Plan Policy H1 and NPPF Chapter 11.

Chapter 5.3: North Place - Policy BP3

TfL CD remains supportive of Brent's Vision for development outside of Growth Areas to come forward within intensification corridors and within centres, including Kingsbury, in the form of tall buildings (Para 5.3.26). However, whilst we acknowledge that the Council has undertaken a Tall Buildings Study and considers the approach to tall building heights appropriate, we still consider the limitation on building heights within Part (b) of Policy BP3 North of between five and six storeys in town centres and intensification corridors to be overly restrictive. As currently drafted, the policy inhibits the most efficient use of land and could discourage development – it is neither positively prepared nor justified. The policy should be more flexible on tall building heights in these areas to accord with NPPF (2019) and the Draft London Plan, and to allow the suitability of tall buildings to be determined on a case by case basis having regard to the visual, functional, environmental and cumulative impacts, as well as the requirement to optimise housing delivery. Draft London Plan Policy D1B supports a case by case approach to determining optimal development densities depending on location specific criteria including local context, local infrastructure capacity and existing and planned connectivity and accessibility. These changes are required if the policy is to encourage the most effective use of land and support sites being developed to their optimum capacity.

We continue to support the general policy objectives outlined within Policy BP3 North, Homes, including the potential for residential development within town centres including Kingsbury. TfL CD also strongly supports the provision under Town Centres, Part (I) to encourage residential development in town centre locations, including on upper floors, and making efficient use of land, which is supported by policy at all levels.



Under Policy BP3 North, Homes, TfL CD suggests that further reference should be made to supporting development within areas of strong public transport accessibility, to ensure that appropriate development opportunities are supported in locations outside of the identified areas of focus (i.e. growth areas or intensification corridors).

Chapter 5.6: South East Place – Policy BP6

TfL CD welcomes the amendment to the wording of draft Policy BP6 (c) which means that tall buildings will now be considered appropriate in the South Kilburn Growth Area, where they are consistent with the South Kilburn Masterplan. This area includes the allocated site BSESA34: Kilburn Park Underground Station - a site located adjacent to a transport hub with a high PTAL where development densities should be optimised in line with the Draft London Plan.

Chapter 5.6: South East Site Allocations, Policy BSESA34, Kilburn Park Underground Station

TfL CD continues to welcome site allocation BSESA34: Kilburn Park Underground Station for the allocated uses of station, ground floor commercial and residential across upper floors. Within our representations to the Preferred Options Local Plan we requested that the site was allocated for higher density development given the site's location within the South Kilburn Growth Area and its PTAL rating of 6a, in line with Draft London Plan Policy D1B. The Council's consultation statement states that in the absence of a capacity study supported by a Heritage Statement, 12 units is considered an appropriate indicative capacity and no change to the site allocation is proposed. However, in this Regulation 19 Local Plan, site allocation BSESA34 states a capacity of "unknown". The consultation statement and Regulation 19 Local Plan are inconsistent and the Council's intentions for the indicative capacity of this site are unclear. We request that the word "unknown" is removed and the site is allocated for higher density development, to be determined on a site specific basis taking into consideration site context, visual, functional and environmental factors and current and planned public transport improvements, in line with Draft London Plan Policy D1B. This is required to ensure the site allocation is justified.

Chapter 5.7: South West Place - Policy BP7

TfL CD continues to support the provision of high density development within both the Wembley and Alperton Growth Areas, especially in locations close to transport infrastructure and within town centres in Policy BP7.

TfL CD remains of the view that a limit of five to six storeys for town centre development under Policy BP7 Part (b) is unnecessarily restrictive. The suggested height would not support the optimal development of sites in this area. The Council's consultation statement claims that "*The suggested height is considered appropriate when taking account of the existing character and sub-urban nature of the area*", but fails to acknowledge the local infrastructure capacity, existing and planned connectivity and accessibility of the area, all of which make it a prime location for development. Therefore, the policy conflicts with Draft London Plan Policy D6 which supports a case by case approach to determining optimal development densities, depending on location specific criteria including local context, local infrastructure capacity, and existing and planned connectivity and accessibility. As such, this threshold should be removed and the wording made more flexible, to ensure that appropriate



height and density are determined on a case by case basis.

TfL CD recommends that BP7 South West, Homes, Part (e) includes reference to the suitability of areas well-served by public transport to support higher density development and an increase in housing provision to make the most efficient use of land resources. This would align with Draft London Plan Policy H1 and NPPF Chapter 11 making effective use of land.

Chapter 5.7: South West Site Allocations, Policy BSWSA14, Sudbury Town Station Car Park

TfL CD continues to support the allocation of sites within Alperton under site allocation BSWSA1, and the inclusion of site allocation BSWSA13: Sudbury Town Station Car Park for residential use. Whilst the consultation statement notes that the currently drafted capacity of 30 residential units is indicative and therefore flexible, we cannot find a background evidence base which justifies this number and feel strongly that it does not accurately reflect the site's capacity. It therefore does not support the most efficient use of this site, particularly given its high PTAL rating of 4-5 and the policy support in the Draft London Plan for maximising development on underused brownfield sites in areas of high accessibility or close proximity to transport hubs. Initial design work indicates that this site could accommodate approximately 55 units, and this should be reflected in the site allocation. This change is required to ensure that the allocation is positively prepared and justified.

Chapter 6.1: Design, Policy BD1 – BD2

TfL CD agrees that development should respect local character and context with regards to scale and massing amongst other considerations. DLP Policy D6 states that the optimal development density for a proposal should take account of factors including existing local character and land uses, existing and planned accessibility and connectivity, and the capacity of surrounding infrastructure. As such, in our representations to the Preferred Options Local Plan, we advocated greater flexibility for determining appropriate development heights through a design-led approach. The Council's consultation statement notes that new development outside of Tall Building Zones must respond positively to existing character, including heights, but proposes no increased flexibility to the policy to ensure this is implemented. Under our recommendation of a site by site design-led approach, this policy would ensure that each site's attributes are accurately evaluated so that development responds effectively to the surrounding context and supports an appropriate amount of growth. Furthermore, we consider that the exceptional circumstances within which tall buildings would be permitted outside of the areas stated (as set out in Policy BD1) should include *"positive additions to the skyline that would enhance the overall character of the area"*. The requirement for the building to be of a civic or cultural importance is overly specific and restrictive and does not promote tall buildings in suitable locations.

Chapter 6.2: Housing, Policies BH1 and BH2

Policy BH1 supports the provision of homes in Growth Areas, site allocations and appropriate windfall sites. As stated in representations dated 18 December 2018, TfL CD considers that *"transport hubs and sites with high public transport accessibility"* should also be listed as sites capable of supporting new homes, as required by Draft London Plan Policy H1. These sites often have great capacity for homes in excellent locations and optimising their development should be supported by policy where possible. Similarly, Policy BH2



should also identify transport hubs and areas with high PTAL as locations where the provision of additional homes will be supported. This is noted in the justification for this policy in Paragraph 6.2.33, but not explicitly referenced in the policy wording.

Chapter 6.2: Housing, Policy BH3

Policy BH3 sets out that *“to encourage increased housing delivery, within Growth Areas or on development sites of 500 dwellings or more, the provision of Build to Rent properties will be expected”*, with some specified exceptions. As stated in representations dated 18 December 2018, whilst TfL CD supports the provision of Build to Rent schemes, this policy wording is too inflexible. This policy provides no support for schemes suitable for Build to Rent that may be smaller in size than the 500 units specified. It also fails to recognise that there may be requirements for other forms of housing on sites of over 500 units. Paragraph 6.2.38 states that *“the Council does not wish to see all large scale development sites coming forward as build to rent. It wants to encourage additional home ownership opportunities within the borough for those that can afford it”*. As currently drafted, the policy wording does not reflect this position. As such, the word *“expected”* should be replaced with *“supported”* to provide greater flexibility and align with paragraph 6.2.38. These changes are also required if the draft Local Plan is to be considered sound.

Chapter 6.2: Housing, Policy BH5 Affordable Housing

The Policy sets out the affordable housing tenure split required to comply with London Plan Policy H6 Threshold Approach to Applications. For Built to Rent developments, the proposed required tenure split to qualify for the fast track approach is 100% at London Living Rent (LLR). Notwithstanding our comments below, we request that references to LLR are specified as rent levels, to avoid confusion with an LLR product.

TfL CD supports the principle of providing DMR at LLR levels within Build to Rent schemes. However, we are concerned that requiring 100% of affordable Build to Rent units to be provided at LLR levels will not provide a “range of genuinely affordable rents” and would not contribute to providing a mixed and balanced community in accordance with draft London Plan Policy GG4 (Delivering the homes Londoners need).

We note that Policy H13 of the draft London Plan states *“The Mayor expects at least 30 per cent of DMR homes to be provided at an equivalent rent to London Living Rent with the remaining 70 per cent at a range of genuinely affordable rents.”*

Rather than providing a mono tenure affordable Built to Rent housing at LLR levels, we consider a more balanced and flexible approach would be to revert to that set out in the draft London Plan Policy H13 above. Providing 30% of the affordable housing at London Living Rent Levels and the remainder at a range of DMR discount levels to be agreed with the Council would allow a range of discount levels to be provided.

Furthermore, given that LLR levels are set by the GLA on an annual basis (and with no way to predict future rent levels in advance), this suggested approach will allow Brent to maintain a greater level of autonomy over the DMR rents secured within schemes. Overall, this would ensure that a greater range of genuinely affordable homes are secured.

In addition, the Policy as currently drafted would create a viability issue for the majority of BTR schemes, and require a viability tested route to be adopted. This is because BTR



developments have a different financial model which creates additional viability challenges, compared to traditional private for sale schemes. Viability challenges arising from the proposed policy are likely to slow or prevent delivery of much needed rental homes for Londoners. This is particularly relevant given Policy BH3 (Built to Rent) which expects the provision of Built to Rent homes on all developments of over 500 units.

We therefore request that the policy is altered to remove the requirement to provide 100% London Living Rent and replace it with a requirement to deliver at least 30% of the affordable homes at London Living Rent levels, with the remaining 70% to be at a range of discounts to market rent which are to be agreed with the Council.

Chapter 6.4: Economy, Policy BE1 – BE9

TfL CD supports Policy BE2 in principle, including the allocation of Alperton North Locally Significant Industrial Site (LSIS) as a site suitable for intensification through co-location, primarily for residential alongside industrial land uses. However, we consider that both Alperton Central and South's LSIS should also be designated for intensification with some co-location. Whilst we appreciate that the Alperton South waste site is an important resource to the borough, this should not preclude the site being optimised for residential development through co-location where it is feasible and possible to do so. Therefore, we still recommend that both Alperton Central and South's LSIS should be designated for intensification with some co-location. This would enable an increase in industrial floor space alongside greater residential provision from the combined site allocation, helping to contribute towards Brent's identified housing need and industrial intensification target. These changes are required if the policy is to be considered positively prepared and justified.

The BE2 policy approach for the Wembley SIL Site has changed. The Regulation 18 draft Local Plan stated the following:

"Intensification: These sites will be protected for solely employment uses within use class B1c, B2, B8 and closely related sui generis uses. Development will be supported which increases the amount of employment floor space. Any loss or reduction in floor space will be resisted." The policy approach for Wembley was *"Intensification as above, **with exception of site allocations.**"*

In this Regulation 19 draft Local Plan, the policy approach for the Wembley Site no longer states *"Intensification as above, with the exception of site allocations"* – it has been placed under the standard intensification policy approach, where sites will be protected for solely employment uses. TfL CD has not suggested this change in any previous representations and it is not appropriate. This should be reversed to ensure that within the Wembley SIL Site and site allocations are exempt from solely employment use intensification.

Chapter 6.8: Transport, Preferred Policy Options BT1- BT4

TfL CD strongly supports the principles advocated within Policy BT1, Sustainable Travel Choice, including reference to prioritising active and sustainable travel over private motor vehicles. The Mayor's Transport Strategy advocates that by 2041, at least 80% of trips across London should be made by public transport, and TfL CD strongly supports this aim to achieve significant modal shift. TfL CD welcomes Brent's desire to align with Draft London Plan policy regarding residential parking provision, which will contribute towards the reduction of car dependant development. We also note the clear criteria for determining the



suitability of development with regard to the impact of proposed parking, under BT2 Managing the Impact of Parking, which TfL CD supports.

Other Sites Not Identified within the Draft Local Plan

In representations dated 18 December 2018, we identified the following sites in the borough which we identified for residential-led, mixed use development:

Site	'Area'	Indicative Unit Numbers	Timeline (years)	Other Information
Wembley Park Bridge Road	Central	150-200	10+	
Land at Preston Road	North West	200	<5	The site at Preston Road is considered capable of delivering approximately 200 homes. Significant consideration will be given to mitigating the loss of ecologically designated land on the site, given the site of importance for nature conservation designation across the entire site.
Queensbury Station car park	North	50	<5	
556-614 Kingsbury Road	North	10	10+	
Aylesbury Street	East	10	5-10	

We welcome the addition of site allocations for Wembley Park Bridge Road and Queensbury Station Car Park, as noted in the Council's consultation statement.

Wembley Park Bridge Road



The site allocation currently states that the site is 0.3ha. The accurate area of this site is 0.34 hectares and the site allocation should state this. The suggested capacity of 60 dwellings for this site is too low. We previously proposed an indicative capacity of 150-200 units, an appropriate and feasible figure if this site is to be appropriately optimised. The indicative capacity should be increased to reflect the ambition of TfL to develop this site to optimise housing delivery in line with Draft London Plan Policy H1 and NPPF Chapter 11.

Queensbury Station Car Park

The suggested capacity of 36 dwellings for this site is too low. We previously proposed an indicative capacity of 50 units - an appropriate and feasible figure if this site is to be appropriately optimised. The indicative capacity should be increased to reflect the ambition of TfL to develop this site to optimise housing delivery in line with Draft London Plan Policy H1 and NPPF Chapter 11.

We also remain confident that the remaining three sites identified above (Land at Preston Road, 556-614 Kingsbury Road and Aylesbury Street) can make a significant contribution towards meeting borough housing targets, as well as improved public transport infrastructure, and therefore they should also be allocated within the Local Plan.

Concluding Remarks

Thank you for the opportunity to provide comments on this draft of the Local Plan. We respectfully request that the comments above are taken into account when revising the draft ahead of submission to the Secretary of State, and TfL CD reserves the right to participate at the Examination in Public.

We look forward to being kept up to date with the next steps and your programme going forwards.

Yours faithfully,

Transport for London Commercial Development





