



By email

3 December 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.

Yours sincerely,

London Plan and Planning Obligations team | City Planning



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

Reg. 18 section	Reg. 18 track change/comment	Reg. 19 update
<p>BEGA1 Neasden Stations Growth Area</p>	<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. 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

Reg. 18 section	Reg. 18 track change/comment	Reg. 19 update
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
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

Reg. 18 section	Reg. 18 track change/comment	Reg. 19 update
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
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

Reg. 18 section	Reg. 18 track change/comment	Reg. 19 update
BSWSA4 - Sunleigh Road	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	We welcome the proposed changes – no further changes required by TfL
BSWSA5 – Abbey Manufacturing Estate	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	We welcome the proposed changes – no further changes required by TfL
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

Reg. 18 section	Reg. 18 track change/comment	Reg. 19 update
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
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

Reg. 18 section	Reg. 18 track change/comment	Reg. 19 update
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

Reg. 18 section	Reg. 18 track change/comment	Reg. 19 update
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
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