

**From:** Brent Cycling Campaign [REDACTED]  
**Sent:** 19 August 2021 21:16  
**To:** Planning Strategy  
**Subject:** Fwd: Brent Local Plan - Consultation on modifications

Submitting this again as there was a typo in the email address.

Hoping good reception this time round.

Thank you

----- Forwarded Message -----

**Subject:** Brent Local Plan - Consultation on modifications

**Date:** Thu, 19 Aug 2021 21:13:22 +0100

**From:** Brent Cycling Campaign  
[REDACTED]  
[REDACTED]

Dear Mr Lewin,

This is the response of Brent Cycling Campaign, the local group of the London Cycling Campaign in Brent. We represent Brent residents and members who cycle or would like to cycle more in the borough.

Given the urgency of the Climate Breakdown, it is quite surprising that there is no more emphasis on the need to ensure that walking and cycling, or clear actions on how these modes of transport are to be prioritised and to reduce the need to travel by harmful and inefficient mode. This is a consideration that should be inherent to any long planning strategy documents. This is a plan that covers a period up to 2041 and we need changes now in order to have the best future we can by then. We need to have targets clearly spelt out.

Our borough is already congested with excess traffic and pollution especially in areas that will benefit the most from regeneration projects. Planning for housing must be in line with the latest London Plan and the latest guidance (Local Transport Note (LTN) 1/20) that came out from central government following the covid crisis.

In [Gear Change](#), it clearly says: "*We will ensure that all new housing and business developments are built **around** making sustainable travel, including cycling and walking, the first choice for journeys.*" This will not happen if sustainable transport infrastructure comes as an afterthought and if the council continues to put private motor traffic flow above everything else. Active travel must be **embedded** in planning. The government recognises that: "*While many local plans already say the right things, they are not always followed consistently in planning decisions*" and therefore Active Travel England will be a statutory stakeholder within the planning system. It would make sense for Brent to acknowledge this and be adequately prepared with an ambition matching the challenges ahead.

More specific points:

MM23 is new, and does not mention active travel (where this clearly should). Why?

MM26 at least mentions cycling.

MM27 should address walking and cycling \*at\* Staples Corner as well.

MM28 uses stronger wording about pedestrian routes, but does not use the same tone about cycle routes. Why?

MM29 needs to remove reference to problem at Staples Corner.

MM35 addresses connections between Stag Lane and Edgware Road, but not the roads themselves.

MM41 does not mention active travel.

Good references to car free as starting principle for developments with high PTAL in some modifications.

However, these are not universal.

MM87,88,89, we support the reference to "A publicly accessible east/west walking/cycling route should be provided along the northern edge of the canal side..." Will need to be inclusive and fully accessible to anyone regardless of their age, gender or level of ability.

MM123 good to see this now addresses relevant cycling standards, or at least "London Plan standards", however, this is not the most recent standard. Please refer to the Local Transport Note 1/20 which is the latest guidance.

MM127 refers to all new developments being "air quality positive or neutral", there is no clear definition.

BT1: Should also include a reference to inclusive cycling design standards - for cycle parking, long and short stay and lane design provision - as detailed in Wheels for Wellbeing guide which informed national design guidance (LTN 1/20).

BT3: Freight consolidation encouraged should also include exploring logistics hubs with a greater use of cargo bikes for instance, and support from the council for any development wanting to investigate this option. This can be in isolation or in conjunction with the use of sustainable alternatives, i.e, by rail and canal. There needs to be more joining the dots thinking between transport and health

5.3.14. "The existing significant cycling infrastructure within this place, includes an on-road cycling route along the A5 and Fryent Way, and an off road cycling route which passes through Roe Green Park." We strongly dispute the use of the word 'significant'. This section of infrastructure would qualify as below standard expected and is not inclusive.

Thank you

Kind Regards

[Redacted Signature]

Visit our [website](#) | Follow us on [Twitter](#) | Like us on [Facebook](#)



We want Brent to be a healthier, cleaner and happier place to live, where cycling is a choice available to anyone.

[Guide to Low Traffic Neighbourhoods](#)

**CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe**