

Comments received from TfL Policy in January 2019 to the draft Brent Local Plan Preferred Options, together with officer response and proposed recommended modifications to be made to the Regulation 19 version of the Draft Local Plan when submitted for Examination.

Chapter	Para/ Policy	Name/ Organisation	Comment Summary	Officer Response	Proposed Change
3 Spatial Portrait	3	TfL Spatial Planning	Document should identify which stations/services should be prioritised for investment, ideally providing a list of proposals by site allocation/ station.	Noted. Stations which will require enhancements have been referred to within the individual place policies, stating some of the main improvements will be necessary and where, e.g. Northwick Park Tube Station which identifies the need to increase capacity and create step free access. This can be supplemented by the Infrastructure Delivery Plan which should be updated on a more regular basis.	No change
5.1 Central	BCSA7	TfL Spatial Planning	TfL Commercial Development are working on proposals for the southern portion of this site. The two portions should be under separate site allocations. TfL CD have commented on this in more detail.	A response to TfL commercial who made a representation on this site has been made. The policy provides sufficient differentiation for the development of the two sites, so the retention of one policy with details on each site is considered appropriate.	No change
5.2 East	BEGA1	TfL Spatial Planning	Welcome safeguarding of land for WLO, and site allocations in the surrounding area. WLO	Noted. Policies elsewhere in the Plan should allow sufficient control of development to take account of operational requirements and the	Amend policy BEGA1 to include in planning considerations: "Development around the existing or proposed rail stations and

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			<p>is yet to receive full commitment to funding/delivery. Development close to the existing/proposed stations should account for potential requirements of the rail network, and associated mitigation measures. Neasden station has a constrained ticket hall/stairway, improvements to which should be considered.</p> <p>Requirement for a bus/cycle/pedestrian link between Neasden Lane and Great Central Way, within the Neasden Stations Growth Area should be included within the site allocation.</p>	<p>potential need to provide mitigation for any impacts. There is however merit in being more specific about this in the policy BEGA1 to ensure it is considered sufficiently. In relation to Neasden station, it is recognised that the development might need to mitigate some impacts of increased patronage. This can also be mentioned in policy, although the business case for the WLO also identifies a funding gap which it is anticipated could be addressed through funds generated from development in close proximity to the line. A bus/cycle/pedestrian link between Neasden Lane and Great Central Way could have big connectivity benefits and realistically should at least be considered at the initial stage of masterplanning. It is however a significant piece of infrastructure that could have ramifications for the delivery of Growth Area. As it will need to cross at least one railway, the engineering will be very expensive, plus third party land interests would need to be dealt with/add to costs. The simplest route would appear to be across the growth area with the land take required likely to reduce developable land significantly. As such, with all the other matters to address from the policy, its delivery is</p>	<p>close to infrastructure should take account of operational requirements and the potential need to provide mitigation for any impacts." "Masterplanning should consider the potential for a future bus/cycle/pedestrian link between Neasden Lane and Great Central Way and if possible allow sufficient space within layout to allow this longer term aspiration to be delivered."</p> <p>In infrastructure requirements add: "Neasden station has a constrained ticket hall and stairways. TfL has identified that there may be a need to consider station improvements to accommodate development related demand, with associated financial contributions."</p>

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				likely to be unviable. Consideration of it as part of any masterplanning to allow for its future delivery if it can be accommodated is however prudent at this stage. As such there is merit in identifying it in the policy.	
5.2 East	BEGA2	TfL Spatial Planning	Development should consider impacts on the TfL Road Network and its junctions, with careful consideration of vehicle access taken. Although site has a low PTAL, should consider potential for car-free development to mitigate this impact, potentially through provision of: car clubs, bus enhancements, and cycling infrastructure.	Noted. Policy BT4 'Forming an Access on to a Road' excludes access roads being developed onto the TLRN and London Distributor Roads. The policies within the document seek to reduce traffic generation from within the borough as far as practicable. The Council does consider car free in lower PTAL areas where it can be sure that it can be delivered without adverse impacts on occupants/neighbours. Given the scale of the site, identification of this potential is considered appropriate to factor in in terms of providing any significant infrastructure requirements.	Include within Planning Considerations: The Council together with TfL will consider the extent to which the area can support car-free development through suitable improvements to public transport and measures to not adversely impact on neighbours amenity of any potential parking displacement.
5.2 East	BESA2	TfL Spatial Planning	Site not owned by TfL, but is used by Metroline to provide TfL bus services. Object to the allocation of this site as it is essential to the operation of the local bus network, and is contrary to the Mayor's policies on the retention of operational transport	Noted. The text identifies delivery of the site will be subject to the retention of a bus depot or reprovision elsewhere. The council has identified what it considers to be under-utilised land through a number of allocations to support future housing growth. Despite existing constraints, it is considered appropriate to identify this site, given suitable protection of the bus depot, or if not needed, other employment uses	Remove reference to site being owned by TfL and replace with Private ownership. Amend reference to the bus depot's retention or replacement to: "An operational bus garage of equivalent capacity needs to be retained/re-provided on the site unless TfL confirms that it is no longer operationally required, or a

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			land. Constrains including limited access and proximity to rail lines will make redevelopment problematic. Site allocation should be removed.	on site as part of maximising the efficient use of land within the borough. This is similar to TfL identifying opportunities on retained operational land, such as above stations.	suitable replacement can be provided elsewhere.”
5.3 North	BNSA3	TFL Spatial Planning	Bus facilities on this site should be retained and enhanced, with early engagement with TfL London Buses. Development close to the rail infrastructure will need to consider and mitigate any potential impacts.	The site allocation makes reference to the existing bus stand and creating a new bus stand on Westmoreland Road. It is recognised that more emphasis could be placed on the potential impact of the development on rail infrastructure and vice-versa.	In planning considerations add: 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
5.4 North West	BNWGA1	TFL Spatial Planning	As Northwick Park station is included within the allocation, TfL should be listed as a landowner. TfL is working with Brent to increase capacity and introduce step-free access. Station improvements should be included within infrastructure requirements. Welcome the intention to improve bus interchange	Noted. Planning considerations identifies: "Northwick Park station's access is via a narrow brick tunnel. No step free access is currently available to platforms. Development should seek to address these issues. An interchange incorporating a suitable bus turning point, stand and associated driver facilities will need to be incorporated into the development. This will improve the connection between the underground and buses and potentially transfer bus routes from the surrounding road network north of Northwick Park Station." In addition	Include TfL among the landowners.

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			facilities, including turning, standing, and driver facilities. Developers on site should contribute significantly toward the funding of these works.	Infrastructure Requirements identifies "Improvements to the capacity of, and pedestrian accessibility to, Northwick Park Station." and "An infrastructure agreement will be drawn up and signed by all four key partners." A such it is considered that the matters raised are suitably addressed, with the landowners understanding that they will have to commit to associated improvements.	
5.4 North West	BNWSA1	TFL Policy	Car parking should be minimised due to PTAL rating, and should be made public so as to serve the wider town centre. Impacts on rail infrastructure should be considered and mitigated.	The site currently has parking restrictions by Sainsbury's due to its proximity to the tube station/town centre. Its PTAL rating means residential will be car free. However the need for parking to serve the wider town centre/ be publically available is well made. Reference is made to residential not being adversely impacted by the railway. It is agreed that reference could be made to ensuring development takes account of operational requirements and provides potential mitigation for any impacts.	Include within planning considerations: "If parking is provided it should be made publically available and be designed to serve the wider town centre." And "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".
5.5 South	BP5 & 5.5.30	TFL Spatial Planning	Point U 'enhancing the setting of Harlesden Station and its connectivity to the surrounding area' is unclear. TfL seeks clarity as to whether this involves wayfinding and	Noted. Criteria U is made in reference to improved public realm surrounding the station. The council believe for this wording to be clear, and by using the word 'setting' are not suggesting the station structures/ operation themselves should be altered. For clarification on this matter additional	Include within criteria U of policy BP5 specific reference to wayfinding and public realm enhancements (<u>change already made as part of Publication Plan</u>). Amend sentence within para 5.5.30 as follows: 'It will be important that the council

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			the sense of arrival, rather than changes affecting the station structures/ operation. Point W and para 5.5.30 should include reference to co-operation with Network Rail as owners of the rail infrastructure, in addition to: TfL, OPDC, landowners, developers, and community groups.	text will be included within the policy. The criteria within place policies such as BP5 are intended to be concise and therefore reference to stakeholders can be made in the supporting text. See proposed changes.	continues to work with Network Rail as the owners of the operational rail infrastructure, in addition to: TfL, OPDC, potential developers and community groups.'
5.5 South	BSSA7	TFL Spatial Planning	Site not owned by TfL, but is used by Metroline to provide TfL bus services and is believed to be in private ownership. Object to the allocation of this site as it is essential to the operation of the local bus network, and is contrary to the Mayor's policies on the retention of operational transport land. In TfL's experience it is extremely difficult to come up with viable development proposals which retain the bus garage. This site	Noted. The allocation text identifies delivery of the site will be subject to the re-provision of a bus depot. The council has identified what it considers to be under-utilised land through a number of allocations to support future housing growth. Despite existing constraints, it is considered appropriate to identify this site, given suitable protection of the bus depot, or if not needed, other employment uses on site as part of maximising the efficient use of land within the borough. This is similar to TfL identifying opportunities on retained operational land, such as above stations. The need to re-provide a depot that meets operational requirements unless it is no longer needed/ will be provided elsewhere	Note now site allocation BSSA5. Change ownership details to private. Amend planning considerations to incorporate: An operational bus garage of equivalent capacity needs to be retained/re-provided on the site unless TfL confirms that it is no longer operationally required, or a suitable replacement can be provided elsewhere.

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			allocation should be removed.	could also be made clearer in Planning Considerations.	
5.5 South	BSSA8	TFL Policy	Impact on rail infrastructure should be considered and mitigated, including contributions towards capacity and step free access improvements at Stonebridge Park station, especially due to the cumulative impact of development from this and other nearby sites including Northfields. Development should consider impacts on the TfL Road Network and its junctions, with careful consideration of vehicle access taken. Support development coming forward car free.	Noted. See proposed change. Policy BT4 'Forming an Access on to a Road' excludes access roads being developed onto the TLRN and London Distributor Roads. The policies within the document seek to reduce traffic generation from within the borough as far as practicable.	Note now site allocation BSSA6. Include within planning considerations. The development will need to mitigate impacts upon rail infrastructure, and contributions toward capacity and step free access improvements at Stonebridge Park station will be sought.
5.5 South	BSSA9	TFL Spatial Planning	Impact on rail infrastructure should be considered and mitigated, including contributions towards capacity and step free access improvements at Stonebridge Park station, especially due	Noted. See proposed change. Policy BT4 'Forming an Access on to a Road' excludes access roads being developed onto the TLRN and London Distributor Roads. The policies within the document seek to reduce traffic generation from within the borough as far as practicable.	Note now site allocation BSSA7. Include within planning considerations. The development will need to mitigate impacts upon rail infrastructure, and contributions toward capacity and step free access improvements at Stonebridge Park station will be sought.

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			<p>to the cumulative impact of development from this and other nearby sites including Northfields. Development should consider impacts on the TfL Road Network and its junctions, with careful consideration of vehicle access taken. Support development coming forward car free.</p>		
5.7 South West	BSWSA1	TFL Spatial Planning	<p>Object to the allocation of this site as it is essential to the operation of the local bus network, and is contrary to the Mayor's policies on the retention of operational transport land. In TfL's experience it is extremely difficult to come up with viable development proposals which retain the bus garage. TfL comment that this site is removed. If it is retained, the planning requirements should make it clear that an operational bus</p>	<p>Noted. The council has identified what it considers to be under-utilised land through a number of allocations to support future housing growth. Despite existing constraints, it is considered appropriate to identify this site, given suitable protection of the bus depot, or if not needed, other employment uses on site as part of maximising the efficient use of land within the borough. This is similar to TfL identifying opportunities on retained operational land, such as above stations. It is accepted that there is a need for clarity on the issue of the need to re-provide a depot that meets operational requirements unless it is no longer needed/ will be provided elsewhere. Thsi should be included in the Planning Considerations. IN relation to the</p>	<p>Planning considerations to be amended to include. An operational bus garage of equivalent capacity needs to be retained/re-provided on the site unless TfL confirms that it is no longer operationally required, or a suitable replacement can be provided elsewhere. 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. Contributions will be sought towards potential capacity and/or step free access improvements at</p>

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			garage or equivalent of increased size needs to be retained on the site and that this may determine the nature of surrounding development. Impact on rail infrastructure should be considered and mitigated, including contributions toward capacity and step free access improvements at Alperton Station.	operational railway land, this also should be included in the planning considerations. The capacity issue at the station is also accepted as a relevant consideration that should be incorporated.	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.
5.7 South West	BSWSA2	TFL Spatial Planning	The retention/enhancement of Glacier Way bus stand should be included as an infrastructure requirement. TfL should be consulted early on this. Contributions toward capacity and step free access improvements at Alperton Station should be included.	The policy identifies that the bus stand should be taken account of in any proposed development. However greater clarity would be provided by the amendments suggested by TfL. As with other sites in this area, it is also considered appropriate to make suitable reference to the need for development to contribute to capacity and/or step free access at Alperton station.	Amend planning considerations after reference to the bus stand include: "This must be retained or enhanced as part of any development and early discussion with TfL London Buses on this is should take place." Amend infrastructure requirements: Remove "No specific infrastructure requirements identified beyond" and add another sentence: "Contributions will be sought 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

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					nearby sites in the Alperton Growth Area."
5.7 South West	BSWSA3	TFL Spatial Planning	Impact on rail infrastructure should be considered and mitigated, including contributions toward capacity and step free access improvements at Alperton Station.	These requests are reasonable and as such the policy can be amended to accommodate them.	Amend planning considerations to include: "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." Amend infrastructure requirements to include: "Contributions will be sought 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."
5.7 South West	BSWSA4	TFL Spatial Planning	contributions toward capacity and step free access improvements at Alperton Station should be included.	These requests are reasonable and as such the policy can be amended to accommodate them.	Amend infrastructure requirements to include: "Contributions will be sought 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."

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5.7 South West	BSWSA5	TFL Spatial Planning	contributions toward capacity and step free access improvements at Alperton Station should be included.	These requests are reasonable and as such the policy can be amended to accommodate them.	Amend infrastructure requirements to include: "Contributions will be sought 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."
5.7 South West	BSWSA6	TFL Spatial Planning	contributions toward capacity and step free access improvements at Stonebridge Park Station should be included.	These requests are reasonable and as such the policy can be amended to accommodate them.	Amend infrastructure requirements to include: "Contributions will be sought towards potential capacity and/or step free access improvements at Stonebridge station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites."
5.7 South West	BSWSA7	TFL Spatial Planning	TfL has secured a mitigation package including contributions to improve the bus network, Stonebridge Park station and surrounding walking/cycling routes. It is essential that these works are carried forward into any	Agreed, it is reasonable to outline these agreed provisions of transport infrastructure should be delivered if amended development proposals are submitted in the future.	Amend infrastructure requirements to include: "Contributions to improve the bus network, Stonebridge Park station and surrounding walking/cycling routes to mitigate the impact of the development on the surrounding movement network."

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			subsequent planning applications.		
5.7 South West	BSWSA8	TFL Spatial Planning	Impact on rail infrastructure should be considered and mitigated.	Note. See proposed change.	Amend planning considerations to include: "Development close to rail infrastructure will need to take into account operational requirements and the potential need to provide mitigation for any impacts." Amend infrastructure requirements to include: "Contributions will be sought towards potential capacity and/or step free access improvements at Stonebridge Park station that are likely to be needed to accommodate the cumulative impact of development related trips from this and other nearby sites in the vicinity of the station."
6.8 Transport	BT1	TFL Spatial Planning	Welcome emphasis on active travel and application of Healthy Streets principles, and the requirement for contributions toward cycle infrastructure which meets/ exceeds minimum standards. Explicit reference to minimum cycle parking standards as outlined in the draft London Plan	Noted. Reference to London Plan policy T5 will be sufficient, with the London Plan providing the necessary detail, and avoiding our repetition of it.	within Appendix 4 provide the wording: "Cycle Parking Standards as set out in London Plan Policy T5 apply in Brent. <u>(already done in publication version.)</u> "

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			should be made, in addition to reference in appendix 4. 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.		
6.8 Transport	BT1	TFL Spatial Planning	Welcome safeguarding of land for WLO, and site allocations in the surrounding area. WLO is yet to receive full commitment to funding/delivery.	Noted. It has been made clear within the document that the delivery of the WLO is subject to feasibility testing.	No change
6.8 Transport	BT1	TFL Spatial Planning	Should state the need to protect infrastructure essential to the operation of the rail and bus networks, and promote the enhancement of existing facilities and construction of new infrastructure when required.	Noted. The requirement for development to mitigate its impact on London's movement network is included within draft London Plan policy T1. For concision and to reduce confusion it is not the aim of the council to duplicate policy which already covers the borough under National or Regional policy.	No change
6.8 Transport	BT1 & 6.8.17b	TFL Spatial Planning	Policy should state potential need to mitigate pressure of development with funding or physical	Noted. The requirement to provide transport infrastructure physically or through contributions is included within draft London Plan policy T4. For concision and to reduce confusion it is	No change

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			<p>works. Para 6.8.17b should be expanded to include the following types of work: station capacity or access improvements, contributions towards bus services, priority measures as well as new or improved passenger or operational transport infrastructure. Cumulative impact within an area should be assessed to identify the most appropriate mitigation.</p>	<p>not the aim of the council to duplicate policy which already covers the borough under National or Regional policy. Para 6.8.17b makes reference to improvements in general, and does not seek to prescribe which improvements will be necessary and will have to be 'viable and justifiable in the long term'.</p>	
6.8 Transport	BT2/ Appendix 4	TFL Spatial Planning	<p>Welcomes encouragement of car free developments and the meeting of draft London Plan parking maximums. Where CPZs are not already in place or where they require modification, developers should be required to contribute financially and assist implementation.</p>	<p>It is considered that the need to contribute to a CPZ is addressed in the first paragraph of BT2 and paragraphs 6.8.16 & 6.8.17.</p>	No change.

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6.8 Transport	BT2/ Appendix 4	TFL Spatial Planning	<p>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</p>	Noted. Amended to state London Plan standards apply for B1a uses.	<p>Amend Appendix 4: Parking Standards: Parking for Employment Uses</p> <p>8.4.1 Parking standards for B1a uses as set out in the London Plan policy T6.2 apply in Brent. For other employment uses in the B use class or closely related sui generis uses, the following standards, as detailed in Table 1, should be applied. The employment areas in Brent have significant variations in levels of access to public transport and other individual characteristics. A distinction is made between areas of the borough to the north and the south of the Dudding Hill railway line as this broadly reflects variations in public transport provision.</p> <p>8.4.2. The provision of parking in new developments below the standards set out in the table is encouraged (see car free/car capped section). (<u>already incorporated in publication version</u>)</p>

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			Plan maximum standards.		
6.8 Transport	BT3 & 6.8.25	TFL Spatial Planning	Support minimisation of road based freight, the protection of existing freight facilities, and reference to Construction Logistics Plans and Delivery and Servicing Plans. However, this should go further in encouraging consolidation and promoting good practice, safety and technological innovation for deliveries and construction transport, particularly on large development sites or on strategic routes.	Noted. It is considered that incorporation of wording that outlines encouragement of best practice and technical innovation is appropriate.	Amend Policy BT3 paragraph 1 last sentence to: "The use of more sustainable alternatives, i.e.by rail and canal, <u>and pursuit of best practice in technical innovation to consolidate delivery and construction transport</u> is encouraged."
6.8 Transport	BT4	TFL Spatial Planning	Support restriction on forming an access onto the TfL Road Network and London Distributor Roads.	Noted.	No change
6.8 Transport		TFL Spatial Planning	For clarity Elizabeth line (as the name for the actual service) should be used consistently throughout the document rather than	Noted. See proposed change.	Replace the two mentions of Crossrail with Elizabeth Line.

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			Crossrail (which refers to the construction project)		