

Comments by: Robin Sharp CB on draft Brent Local Plan – December 2019

(NB. These comments are my own but are based on a 30-year career in the Ministry of Housing and Local Government, subsequently the Department of the Environment, and active involvement during retirement in Queen's Park Area Residents Association, Clean Air for Brent and Brent Patient Voice.)

General issues

In describing Brent's characteristics not enough is said about the fact that the borough is not a geographical island but an inseparable part of a dynamic international metropolis which is subject to many trends, pressures and opportunities from outside its own borders.

Cities have many advantages which draw people, jobs and special activities to them. At the same time they face serious challenges in housing and transporting residents and workers at prices they can afford whilst minimising environmental damage. Balancing these factors in an acceptable way requires regulation of which land use planning is a vital component.

The Local Plan seems to take for granted the London Plan assertion that overall the capital's population will grow from around 8 to 10 million people between now and 2040. Of the extra 2 million Brent is scheduled to take over 60,000. I submit that this is not environmentally or socially sustainable. Far from improving the quality of life and the health of the population such growth will worsen it.

Brent Council are right to resist the Mayor's annual targets for new housing but it must be recalled that significant population growth also requires new schools and colleges as well as GP surgeries, places an extra burden on hospitals already on their knees in coping with current demands, and above all increases daily commuting to places of employment and education. Then there is a need for appropriate green space.

60,000 is the population of a medium sized town. For example this was the target population of Bracknell when it was developed as a new town in the post-war period. Brent, as a highly developed urban area with a population now of around 350,000 cannot sensibly accommodate an extra 60,000 people. It should not plan on this basis.

The Local Plan needs much more emphasis on action to meet the Climate Emergency and the Air Quality challenges in London, which have fortunately come up the policy agenda since the first draft of the Plan appeared. The most important action is to reduce road journeys by individual private cars, especially where daily commuting is involved and public transport alternatives are available. Brent is especially vulnerable to through commuting traffic – see *A Study of Air Quality in Brent: Imperial College/Clean Air for Brent 2018. Section 3.8*. This shows that in peak hour surveys 55% of the traffic on the A404 in Harlesden had its origin and destination outside Brent, while the

figure for Chamberlayne Road was 64%. Other routes used by car commuters such as the A5, Salusbury Road, Willesden High Road and Lane, All Souls Avenue and Dudden Hill Lane are likely to experience similar levels of car commuting.

The Ultra Low Emission Zone 2021 Extension is predicted to reduce commuting through Brent by non-compliant diesel and petrol cars significantly. **However this beneficial effect will be negated if the population grows by anything like 60,000 additional people.**

In connection with the foregoing I wish to draw attention to two further recent reports on air quality in Brent.

The first is *Getting Ready for the Extended ULEZ 2021: Imperial College/Clean Air for Brent 2019*. Section 3.4. This shows in Figure 16 in section 3.4 that Transport for London predict that the ULEZ 2021 will reduce air pollution in Brent by NO₂ by 36%, with greater reductions within the ULEZ and lower reductions on and north of the North Circular. The credibility of these predictions is re-inforced by the monitoring results from the first 6 months of the Central London ULEZ which has been very successful. (NB. This calls for revision of the statement in 3.3.2 of the draft Local Plan that there are no estimates available of the effect of the 2021 ULEZ in Brent.)

The second report is *Brent Breathes: the Report of the Air Quality Scrutiny Inquiry 2019* available on the Brent website. This wide-ranging report is relevant to many aspects of the Local Plan, including transport. Evidence given after the report was completed by Simon Birkett of Clean Air for London supports a policy of net zero emissions in new development and questions endorsement of CHP schemes and any dependent on carbon usage.

South-East Place (5.6) and Queen's Park area

I believe that the Plan understates the value and long-term sustainability of the Queen's Park area as such. While the cost of buying or renting accommodation in the area is a problem for those who work in many services essential to the community, this price phenomenon is not merely fashion but a vote by the wider London community that the type of housing and its density clustered around the Park (not the Salusbury Road facilities by the way) constitute a very acceptable form of living. If the Plan is going to be illustrated as it is then the iconic photograph is of the Park with the bandstand featured. Moreover the core community has given birth to a residents' association which has been running since 1973, has fought many battles for the environment and quality of life of the area and organises a free annual event in the Park, Queen's Park Day, attended by up to 19,000 people from far and wide.

A few details:

1. What the Plan (but no-one locally) calls the Queen's Park Creative Quarter is in Lonsdale Road (NOT Lonsdale Avenue). The Comments on previous comments says that the Quarter is mapped but I cannot see this.
2. There is a map showing conservation areas in purple but no explanation of any plans except in relation to Mapesbury. Some clarification is needed.
3. 5.6.24 refers to a lack of orbital links but seems to ignore the North London Line (Richmond to Stratford). Since this was taken over by TfL the rolling stock has been renewed and there are now frequent 5-coach trains. Usage has increased enormously. It is not clear if lessons have been learned more widely for public transport improvement but this should be heralded.
4. 5.6.25 refers to reducing car dominance on the A5 but for air quality and climate change reasons we need to see car commuting reduced on all the routes already mentioned and care taken to avoid displacement.
5. In this section and elsewhere there are references to planting trees to improve air quality. As is explained in *Brent Breathes* they don't, though they are good for carbon capture, wildlife and a desirable public realm.
6. The Plan assumes too readily that the South Kilburn redevelopment is a great success. In my view the densities are too high and green space insufficient – not the fault of Brent but of HM Treasury's disastrous policy of withdrawing subsidy from new social housing.

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