



2020

# Statement of Common Ground: Transport for London

LOCAL PLAN 2019 - 2041  
BRENT PLANNING POLICY

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## Executive Summary

This document is designed to identify and set out strategic transport issues. These cannot be wholly managed by the London Boroughs. They require the input and oversight of our high level strategic partner, Transport for London (TfL). In doing so, the Council can ensure that it's emerging Local Plan will be produced positively and collaboratively with its partners. This will also assist the Inspector during Examination in identifying strategic transport matters and how they have been addressed.

The Mayor is responsible for significant parts of the transport system in Greater London. TfL is the body that implements the Mayor's transport responsibilities. This includes responsibility for the Transport for London Road Network (TLRN), all traffic signals, the London Underground, Overground, DLR, Trams, buses, taxis, and some walking and cycling infrastructure.

This Statement also ensures that the requirements set out in the National Planning Policy Framework (NPPF) have been met. The NPPF states that: *"Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries."*

Detailed matters which are best overseen by our strategic partner organisations, due to their nature, will be addressed in separate documents. This will serve to make the documents more concise for relevant parties, and reduce the number of signatories required for each matter. Separate documents have been prepared for the following strategic partner organisations:

- Thames Water and Affinity Water.
- The Canal and River Trust.
- The Environment Agency.

## Sign Off

**Transport for London** agree to matters referred to in this document as outlined in the 'Strategic Matters' section

**Signed:** Josephine Vos

**Position:** London Plan and Planning Obligations Manager

**Date:** March 2020

## Strategic Geography

- 1.1 The London Borough of Brent (LB Brent) is bordered by the London Boroughs of Barnet, Harrow, Camden, City of Westminster, Kensington and Chelsea, Hammersmith and Fulham, and Ealing. Brent is defined as an outer London borough in the London Plan. It includes the Wembley Opportunity Area and a portion of the south of the borough is within the Old Oak and Park Royal Opportunity Area. The Old Oak and Park Royal Development Corporation (OPDC), a Mayoral Development Corporation (MDC), has been the local planning authority in this part of the borough since 1 April 2015. LB Brent has the joint highest number of TfL managed stations out of all the London boroughs. This includes services from the London Overground and the Jubilee, Bakerloo, Metropolitan, and Piccadilly London Underground lines. In addition, there are a large number of bus services.
- 1.2 TfL is also responsible for management of the TLRN. The only road within Brent which is managed by TfL is the A406 (North Circular).
- 1.3 Transport issues which can be managed directly by the London Boroughs themselves are included within a separate document. This document will only pertain to issues which require the strategic involvement of TfL who are better placed to effectively manage them due to their scale. Having said this, the two documents will include some overlap where there are shared responsibilities such as on strategic roads and development of the cycle network.
- 1.4 This document will seek to provide comment on the key concerns raised by representations received from TfL during the Regulation 18 stage Local Plan consultation.

## Strategic Matters

- 1.5 Many journeys within Brent do not begin and end in the borough. It is therefore imperative that the Council works with strategic stakeholders and neighbouring boroughs to ensure that its infrastructure is managed appropriately. The primary emphasis in current planning policy, and therefore in Brent's new Local Plan, is on facilitating greater use of active and public transport and limiting car use in order to achieve the Mayor's mode share targets for 2041. This is particularly important in light of projected population growth.
- 1.6 Increasing the mode share of sustainable modes of transport, namely public transport, walking, and cycling, to 80% by 2041 is a priority within the draft London Plan and the Mayor's Transport Strategy (MTS). To achieve this aim overall in London, Brent is required to achieve a mode share of 66% by 2021 and 78% by 2041. This has been reflected through the priorities outlined in Brent's new Local Plan. This is also the case for the recently published Local Implementation Plan 3 (LIP3). It is of vital importance to increase active travel within the borough as this will reduce congestion and associated pollution. It will also improve a number of other inter-related issues, such as our residents' health.
- 1.7 The Mayor's policies for transport in Brent as reflected in the Local Plan will be implemented in collaboration with TfL. TfL will work with LB Brent to deliver improvements to the

sustainability of the borough. This will move away from the use of personal vehicles, towards sustainable modes, namely public transport, walking and cycling.

- 1.8 A key part of this will involve Brent's negotiation with developers. This will ensure infrastructure essential to the sustainable development of sites is secured through S106 obligations, and CIL contributions. Such infrastructure has been identified in the site allocations within the new Local Plan, LIP3, the Long Term Transport Strategy, and the Infrastructure Delivery Plan.

### West London Orbital rail line

- 1.9 There is potential to improve orbital travel on public transport in London to enable more sustainable travel throughout London. The potential West London Orbital (WLO) rail line will be such a route, connecting Hendon in the north, through Brent Cross, Neasden and Harlesden, to Hounslow in the south. The route is expected to pass through a number of London Boroughs. The draft Brent Local Plan seeks to protect the proposed rail corridor within the borough and support its business case by proposing development adjacent to stations. It also allows for necessary station and supporting infrastructure in site allocations.

### Buses

- 1.10 Further improvements to orbital bus links are an objective for Brent. The Council will continue to work closely with TfL in identifying appropriate changes to bus routes and assisting in their implementation. The success of buses is impeded by the congestion of roads, leading to reduced public confidence in journey times and reliability. This strengthens the argument for measures to manage car travel through parking controls and other demand management measures. The draft Local Plan makes reference in allocations to the potential need to contribute towards capacity improvements on the bus network.

### Station Accessibility

- 1.11 It is important that public transport facilities are accessible to all of our residents. Brent will therefore work closely with TfL in progressing station improvement projects to provide step-free access at stations particularly in conjunction with new development but also where opportunities arise elsewhere, and increasing their general feeling of safety. Where appropriate site allocations in the Brent Local Plan have made reference to the need for development to contribute to improvements to station access and capacity.

### Station Capacity

- 1.12 To accommodate increased population within Brent and throughout London, the public transport system will need to increase its capacity. Brent will work closely with TfL in establishing methods to increase the capacity of its rail infrastructure, including at stations. A number of site allocations identify the need to improve capacity at nearby stations that serve the site.

### Cycle Network

- 1.13 Achieving the Mayor's strategic objective of 80 per cent of trips being taken by sustainable transport modes will not be possible without increased cycling uptake. Brent has already worked with TfL to expand and improve its cycle network, most recently delivering the Cycleway from Gladstone Park to Regents Park. Brent will continue to work closely with TfL to expand and enhance its cycle network to facilitate the increased uptake of cycling within the borough and the Greater London area. The draft Local Plan includes policies that

prioritise cycling, referencing the need to adhere to London Plan cycle parking standards and TfL guidance on the design of associated cycling facilities set out in the London Cycling Design Standards.

### Freight

- 1.14 To reduce the potential for congestion on our road networks, freight and servicing should ideally be undertaken outside of peak hours. Developments which are expected to produce significant freight movement should minimise movement on roads, and should rather explore the opportunity for transit by canal or train as well as opportunities to consolidate and re-time loads. There is also significant potential for freight trips to be undertaken by walking and cycling for at least part of the journey. Brent and TfL will look into the potential for such developments to use railway and canal infrastructure for the movement of freight. Policies in the draft Local Plan including BT3 complement those in the London Plan in seeking to reduce the impact of freight movement on the road network and encouraging alternatives.

### Existing TfL Infrastructure

- 1.15 The Council acknowledges the concerns of TfL raised through its recent Regulation 18 stage consultation on the new Local Plan. The Local Plan identifies a number of bus garages used to provide TfL London Bus services as potential site allocations for the delivery of residential units. In Brent's response, amended wording has been proposed for these site allocations to ensure that there is no loss of bus garage capacity as a result of any redevelopment and that agreement will be needed with TfL. Where bus garages are on designated industrial land there will need to be a higher level of protection. Brent will work closely with TfL to ensure that existing bus garages are not compromised spatially or functionally.

### Road Network Impacts

- 1.16 It is noted that a number of the potential sites allocated for development within the new Local Plan are within close proximity to the TLRN. TfL have raised concerns over the potential impact of such development on the TLRN in representations made during the Regulation 18 stage consultation. Through the policies within the London Plan, and the new Brent Local Plan, the provision of car parking will be minimised with car free development in most identified sites, and access onto key roads such as the North Circular will not be possible. Combined, these measures should serve to reduce the concerns over impacts upon the TLRN by TfL. In addition, in the event that such a site receives development interest, Brent will work closely with TfL to ensure that the function of the North Circular is not compromised, and that should a development generate potential impacts on the operation of the TLRN, Brent will be thorough in its consideration and ensure effective mitigation is taken.
- 1.17 More widely, the draft Local Plan includes policies that seek to reduce car use, referencing the need to adhere to London Plan car parking standards for residential and retail development. This will be essential to achieve mode share targets and tackle congestion, pollution and safety concerns on the road network as a whole. In the Regulation 19 stage consultation TfL requested that the parking policy for employment uses defer to the standards in Table 10.4 of the draft London Plan for all B1 uses.

## Engagement

### *Engagement to date*

- 2.1 The information and actions outlined in this statement have been informed by various evidence base documents, and through on-going engagement with Transport for London.

### *Engagement going forward*

- 2.2 This statement focuses on the impact of spatial policies within the new Brent Local Plan. The impacts from adjacent London Boroughs will be considered in their respective Statements. This improves the fluidity of the document, allowing it to be updated efficiently whenever necessary.
- 2.3 To ensure continued effective collaboration with TfL, Brent will ensure that the document is updated at appropriate intervals, including after the Regulation 19 Local Plan consultation. Information acquired through regular communications will inform the revisions, in addition to strategic consultation events.