

# Transport for London – Written Statement on Matter 4 – Strategic transport, infrastructure and delivery

## Brent Local Plan Examination

**4.1 Has the approach to transport matters and the related policies set out in the Plan been positively prepared and are they reasonable, justified, effective and consistent with national policy, guidance and the London Plan?**

**4.2 Are the transport-related policies in the Plan based on reasonable, robust, and up to date evidence?**

**4.3 Given the high level of development proposed within the Plan, does the evidence base relied upon to support this level of development within the Borough include an adequate assessment of the impact that the proposals would have on the Strategic Road Network (i.e. a Strategic Transport Assessment)? If not, why?**

**4.4 If no Strategic Transport Assessment has been undertaken as part of the Council's evidence base, is the Plan considered to be justified, effective and sound in this regard and consistent with national policy?**

**4.5 Does the Plan, in terms of its transport approach, adequately and appropriately take into account wider transport matters such as the West London Orbital rail line and connections within the Borough to wider bus and cycle networks?**

**4.6 Is the overall approach to transport and the related policies in the Plan accepted and supported by Transport for London?**

**4.7 With regard to the representations made on behalf of St George, does policy BT2 provide a sufficient level of clarity and flexibility in relation to identifying or defining where Controlled Parking Zones can be achieved and the criteria for doing so? Is this approach justified, effective and consistent with national policy, guidance and the London Plan in this regard?**

## Overview

Transport for London (TfL) City Planning has various roles in monitoring, shaping and planning for growth in Brent. Through our development management function, we seek to minimise new developments' dependence on car use, which in turn reduces road network impacts. We support specific area-based growth studies through Opportunity Area Planning Frameworks and contribute to the analytical work that underpins them.

### 4.1, 4.2, 4.5 and 4.6

We responded to the Reg. 18 and Reg. 19 consultations on Brent Local Plan and raised a number of concerns which are detailed in the consultation reports. Taking into account amendments and proposed modifications we are now satisfied that all outstanding issues in relation to conformity with the London Plan's transport policies have been resolved.

This is subject to the inclusion of an additional modification to change the wording of paragraph 8.4.1 in appendix 4 which will state 'Parking standards for B1a uses in outer London as set out in the London Plan policy T6.2 apply to all B1 uses in Brent. For office development south of the Dudding Hill Line Inner London standards will apply.' The additional modification fulfils a commitment in the consultation report that the change in wording would be made in response to TfL's comments, although it was missed out of the list of proposed modifications published in February 2020.

Provision is made in the Local Plan for wider transport matters including strategic projects such as the potential West London Orbital rail line, improvements to London Underground and the bus network. As set out in the London Plan, TfL welcomes references to safeguarding of land and facilitating and securing contributions towards transport improvement projects in a number of specific site allocations.

With the proposed modifications Brent Local Plan transport policies are now considered to be consistent with the Mayor's Transport Strategy (MTS) and transport policies in both the adopted London Plan and the 'Intend to Publish' version of the draft London Plan. The Local Plan draws on the evidence base for those strategic plans and as such, TfL supports the overall approach to transport and related policies in the Brent Local Plan.

### 4.3, 4.4 and 4.5

As part of the development of the MTS and London Plan evidence base, TfL City Planning has carried out strategic transport modelling at the London-wide level. This found that the levels of growth set out in the London Plan can be achieved while mitigating the impact on congestion if the measures set out in the MTS are implemented. While we are currently in a period of particularly high uncertainty, we regularly review our strategic modelling and update our planning assumptions accordingly. Both our Strategic Analysis and Transport Strategy & Planning teams have been in dialogue with Highways England, including on how best to capture population and employment growth in our models and how this then informs assessments for growth areas.

We will continue to work with LB Brent and Highways England to monitor and assess any impacts of growth on the strategic road network within the borough and across London as new development comes forward in the years to come. We are of the view that, at this stage, the growth and schemes set out in Brent's Local Plan are appropriate and should not lead to significant adverse impacts on the strategic road network, particularly when supported by policies to enable walking, cycling and public transport use, restrict car use (such as through the use of car parking policies) and manage freight movements effectively.

#### 4.7

The Intend to Publish version of the draft London Plan states in policy T6C that 'An absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets.' Paragraph 10.6.1 reinforces this message by stating that 'In some areas, it will be necessary for boroughs to introduce additional parking controls to ensure new development is sustainable and existing residents can continue to park safely and efficiently.' There is therefore encouragement for boroughs to introduce *additional* controls on parking such as Controlled Parking Zones (CPZs) *wherever necessary*. The wording of BT2(b) in Brent Local Plan is ambiguous and does not fully reflect the positive approach towards the use of parking controls in the London Plan. TfL would welcome greater clarity in the wording of policy BT2(b) in Brent Local Plan to make it clear that CPZs could be introduced wherever necessary and that their absence would not be a barrier to new development.