

# GREATER LONDON AUTHORITY

Development, Enterprise and Environment

[REDACTED]  
Planning Policy & Projects Manager  
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Brent Civic Centre  
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Wembley  
HA9 0FJ

**Our ref:** LDF04/LDD02/BS

**Date:** 30 March 2017

Dear [REDACTED]

## **Draft South Kilburn Supplementary Planning Document**

Thank you for your email of 16 February 2016 consulting the Mayor of London on the above document. Transport for London's (TfL) submission is attached as Appendix 1, and has also been sent separately.

The draft South Kilburn SPD is supported as it is generally in line with London Plan policy and the net increase of 1940 homes is welcomed.

We may wish to engage further and supply more detail to the above comment when our lead officer returns from leave and trust this would be acceptable.

If you would like to discuss any of the representations in more detail, please contact [REDACTED]  
[REDACTED]

Yours sincerely,

[REDACTED]

[REDACTED]  
**Strategic Planning Manager**

cc [REDACTED] London Assembly Constituency Member  
[REDACTED] Chair of London Assembly Planning Committee  
National Planning Casework Unit, DCLG  
Alex Williams, TfL

## Appendix 1

### Transport for London (TfL) comments

*The following comments are made in TfL's capacity as a provider of transport infrastructure, services and operations and as a strategic highway authority within London. TfL also has substantial landholdings, some of which have development potential for housing. A separate response will therefore be submitted by TfL Commercial development reflecting TfL's role as a landowner and potential developer.*

The transport policies in the document are broadly in line with the strategic transport policies in the London Plan. However, TfL has a number of comments, corrections and suggested changes that should be considered as set out in the attached table/annex.

The Council is encouraged to maintain a constrained approach to car parking levels for new development in South Kilburn with the aim of encouraging the uptake of public and active modes of transport. TfL also supports the use of car clubs where they are likely to be effective in reducing the overall number and impact of vehicles on the local road network.

However, TfL are concerned with the lack of mention of buses in this document. Bus services should be prioritised as a part of the Healthy Streets agenda by the Mayor, and as part of the incoming Mayor's Transport Strategy (MTS) to balance active modes with public transport, including buses. This is not being reflected in this SPD.

Additionally, although there is mention of extending the TfL Cycle Hire scheme to South Kilburn, TfL must emphasise that, regrettably, there are no active proposals to consider this extension without contributions from scheme developers.

The following comments are offered in regard to the South Kilburn SPD:

Reference	Comment
<b>Movement Network/Street Hierarchy, Paragraph 8.2</b>	Efforts to improve the pedestrian and cyclist environment to create a better experience for these users are welcomed. This will ultimately encourage more people to walk and cycle.
<b>Movement Network/Street Hierarchy, Paragraph 8.3</b>	Reference should be made explicitly to the Healthy Streets Framework, as found in the Improving the Health of Londoners document ( <a href="http://content.tfl.gov.uk/improving-the-health-of-londoners-transport-action-plan.pdf">http://content.tfl.gov.uk/improving-the-health-of-londoners-transport-action-plan.pdf</a> )
<b>Movement Network/Street Hierarchy, Paragraph 8.5</b>	One scheme that can benefit both the EVCP and car club aspects within the report is the Go Ultra Low City Scheme (GULCS). TfL, along with the Greater London Authority, London Councils and the London boroughs, has been awarded £13m of funding from the Government's GULCS funding stream. By 2020, the GULCS project will aim to deliver an extra

	<p>1,150 on-street charging points for London's residents, up to 1,000 car club charging points, and will support the delivery of 300 rapid charging points at key locations in London for commercial fleets. The scheme will also provide funding for the development of a number of low-carbon 'Neighbourhoods of the Future', acting as a testbed for innovative EV charging technologies and policies to support the growth of clean vehicles in London.</p> <p>The GULCS project aims to deliver these residential and car club charging networks to London boroughs and this funding will be able to be used to fund the installation of charge points.</p> <p>TfL acknowledge that the Council are keen to secure funding for cycle hire stations from development via s106 funding. However, the cycle hire scheme currently does not extend to South Kilburn and the closest cycle hire stations can be found in St. John's Wood. The TfL Cycle Hire team have no immediate plans, nor funding, to extend to South Kilburn although it is requested that land and funding is safeguarded in similar circumstances.</p> <p>4-5 docking stations would be required to extend TfL's cycle hire scheme to South Kilburn from St. John's Wood, and approximately 6-8 sites to cover the land plots creating a viable network. This funding would be sought via s106 agreements.</p> <p>The current cost per cycle hire station is £220,000 and this breaks down to £110,000 capital costs and £110,000 operational costs for three years.</p>
<p><b>Principle T1 Transportation and Movement, 2<sup>nd</sup> paragraph</b></p> <p><b>Points 1-10</b></p>	<p>Clarification is sought on what kind of development constitutes 'major blocks'.</p> <p>It is important to note that there is a direct link between good public transport access and increased economic vibrancy, particularly footfall in shops to neighbourhoods. This has been verified by past TfL research. So it is particularly important that bus services provide reliable services with improved journey time reliability, less journey time variability, and short walking distances to key amenities etc.</p> <p>The current proposal for South Kilburn would downgrade the reliability of service for Carton Lane/Kilburn Lane bus services, and to the wider area of LB Brent, if the proposed narrowing of the carriageway and the introduction of a number of planned pedestrian crossings (which may possibly be signalised) goes ahead without any protection for buses.</p>

	<p>There are three high frequency routes using these two roads Kilburn Lane and Carlton Vale. These are routes 6, 187 and 316. Route 36 terminates just off the Carlton Lane. Usage is significant here, and delays on through passengers and those boarding will need to be protected.</p> <p>TfL Buses would seek costs towards any possible impact on buses. Therefore, s106 funding for buses is required.</p>
<p><b>Parking Standards, Paragraph 8.6</b></p>	<p>TfL welcomes the potential for car-free development as well as those with a low parking provision in light of the high level of public transport access in South Kilburn and existing CPZ coverage. The Council should ensure that provision of Blue Badge parking and parking for residents of wheelchair accessible housing complies with the London Plan.</p>
<p><b>Parking Standards, Paragraph 8.8</b></p>	<p>TfL seek clarification as to what is being referred to by the 'maintenance' of car clubs. Many car club operators are well-established by now, and would be able to maintain themselves. More clarification is also required with respect to provision of car clubs in residential developments: is this for new housing developments, and would the people living in these developments already have access to a car? If car clubs are located in areas where cars wouldn't be greatly used anyway then this may lead to increased car usage, and therefore increase congestion.</p> <p>The point regarding electrification of car club bays is positive because car clubs are aiming to have 50% of their vehicles as ultra-low emission vehicles (ULEV) by 2025; this is particularly suited to new car club bays rather than existing bays, as there are some legal difficulties with retrofitting existing bays through the GULCS project.</p> <p>Furthermore, The Council should relocate the first paragraph of 8.9 to part of 8.8, in that the provision of car parking spaces for disabled residents should be given its own item.</p>
<p><b>Parking Standards, Paragraph 8.9</b></p>	<p>See point above to isolate the second paragraph of 8.9 to make it its own section.</p> <p>It is unclear who is the 'applicant' that will fund the start-up costs including marketing and initial membership. Car club operators do their own marketing and they also have their own incentives to join the car clubs, so this may not be necessary. As aforementioned, increased car usage should not be condoned by encouraging those who don't already use a car to</p>

	<p>start using a car frequently.</p> <p>TfL support the use of car clubs for business fleets, as this is a market that car club operators are currently looking into. The Council shall investigate if some form of trial could be developed.</p> <p>The Council shall also determine whether BluePointLondon (The scheme operator for the Source London charging network) has identified any suitable sites for charging infrastructure in the area. Alternatively, charge points could be installed from other operators or through the GULCS scheme where demand is likely to exist. Different charge point operator options should be considered.</p>
<p><b>Parking Standards, Paragraph 8.10</b></p>	<p>The applicant may wish to state that cycle parking should meet the London Cycle Design Standards (LCDS), alongside the London Plan.</p>
<p><b>Principle T2 Parking</b></p>	<p>This policy is welcomed with regard to the support for both car free developments and those with a low parking provision. However, the Council should take a careful, restraint-based approach to the provision of off-street parking.</p> <p>Off-street parking may be a preferable alternative to on-street parking, but the quantity of spaces should be limited to reflect the high level of public transport access, and an improved walking and cycle environment in South Kilburn. A high level of off-street spaces to compensate for a lack of provision on-street will only serve to exacerbate congestion and worsen the environment for pedestrians, cyclists and public transport users.</p> <p>TfL support the London Plan standards to include EV chargers in at least 20% of spaces. The Council are reminded that there is also a requirement to include “passive” provision of EV chargers in an additional 20% of spaces, meaning that 20% of spaces should be equipped for the immediate installation of charge points if the demand exists.</p>

