

Brent Cyclists (LCC Local Group in Brent) comments

Page: [Policy SD7 Town centre network](#)

Section: [SD7](#)

Brent Cyclists support the identification of Town Centres, however are concerned that this misses existing centres in Brent of local and international importance. 1. Wembley is a international centre, as are developments in Stratford. 2. Brent Cross is missing as a Metropolitan Town Centre.

Page: [Policy SD10 Strategic and local regeneration](#)

Section: [SD10](#)

Brent Cyclists support the indentification of areas for regeneration, and suggest highlighting that transport poverty is one of the specific causes of deprivation, and that improved facilities for active travel can help overcome this.

Page: [Policy D7 Public realm](#)

Section: [D7](#)

Brent Cyclists are concerned about the suggestion that new developments will include "on-street parking", on-street parking must not be the norm for new developments. The London Plan should have a strong emphasis on reducing on-street parking, and suggest **no** new on street parking for any development of redevelopment.

We are concerned that an emphasis on "public realm" leads to unsafe and unsuitable proposals such as the shared space on Exhibition Road, it must be specified that "public realm" improvement does not mean removing infrastructure (e.g. kerb separation) used to promote safety.

Page: [Policy S11 Improving air quality](#)

Section: [S11](#)

The risk of air quality to active travel users should be considered, in addition to areas with low active travel, but high pollution, areas with high active travel, but lower relative pollution levels should be a focus due to the total impact over the people present.

There is little or no consideration given to the role of road wear, and brake wear, in pollution levels. Increasing the use of alternative motor vehicles (e.g. EVs) will not reduce these sources of pollution.

Page: [Policy SI1 Improving air quality](#)

Section: [9.1.9](#)

If a development cannot meet Air Quality Neutral standards it should not be allowed to proceed, mitigation or payments are not a suitable solution for the Londoners who will be killed through the resulting air pollution.

Page: [Policy SI1 Improving air quality](#)

Section: [9.1.10](#)

This statement should read "Where there have been significant improvements to air quality resulting in an area no longer exceeding air quality limits, development should not take advantage of this investment and worsen the local air quality." Extent of worsening should not be considered, any worsening should not be allowed.

Page: [Policy T2 Healthy streets](#)

Section: [T2](#)

We support this move to prioritise active transport over motorised transport.

Page: [Policy T2 Healthy streets](#)

Section: [10.2.2](#)

Targets for active transport, separate from public transport use, are required.

Page: [Policy T2 Healthy streets](#)

Section: [10.2.6](#)

Distance possible by cycle is not purely dependent upon linear distance, but on ease of travel. Making more routes safe will make longer journeys possible and more inviting due to the lower stress environment. In turn this can reduce pressure on public transport. Specifying "long" and "short" journeys is unhelpful.

Page: [Policy T5 Cycling](#)

Section: [T5](#)

Brent Cyclists support moves to increase access to cycling through infrastructure. We support reallocation of space to cycle parking from other uses such as on-street car parking. We suggest that reallocation of space from other uses such as on-street car parking to cycle infrastructure / routes should be included.

Page: [Policy T5 Cycling](#)

Section: [Table 10.2](#)

Brent Cyclists support these increases in required cycle parking for new developments. The plan must include requirements for cycle parking in all re-development, upgrades, other planning, and existing development cases with a timed implementation plan.

Page: [Policy T5 Cycling](#)

Section: [10.5.1](#)

Brent Cyclists support this plan for a London-wide network of cycle infrastructure.

Page: [Policy T5 Cycling](#)

Section: [Figure 10.2](#)

This figure looks very weak. This is taken on a borough level, not on a neighbourhood level. Therefore sharp divisions can exist at borough boundaries, where cycling levels may be very similar.

Page: [Policy T5 Cycling](#)

Section: [10.5.3](#)

The Mayor should not just "support" higher levels in Mini-Hollands and Liveable Neighbourhoods or Opportunity Areas, but **mandate** higher levels.

Page: [Policy T5 Cycling](#)

Section: [10.5.5](#)

Support, this is often missed in cycle parking, and access, standards.

Page: [Policy T6 Car parking](#)

Section: [T6](#)

Brent Cyclists support restricting car parking for the reasons given, this should be termed "motor vehicle parking" to include non-car vehicles. Provision for Ultra-Low Emission vehicles must not be at the expense of cycle users: ie. must not be on-street.

Page: [Policy T6 Car parking](#)

Section: [10.6.2](#)

PTAL assessment should also include level of cycleability in the area.

Page: [Policy T6 Car parking](#)

Section: [10.6.5](#)

The word "quantum" does not provide meaning.

Page: [Policy T6 Car parking](#)

Section: [10.6.7](#)

Support, as above using the term "motor vehicle parking" would avoid this confusion.

Page: [Policy T6 Car parking](#)

Section: [10.6.8](#)

This means nothing, must all new parking provide for ULEV charging, or a %, or all by 2050?

Page: [Chapter 12 Monitoring](#)

Section: [T1](#)

Brent Cyclists object to the poor provision for monitoring. The target of mode share for walking, cycling and public transport at 80% by 2041 is commendable, however it is weak. There must be additional (yearly) interim targets, within mayoral terms. The target must have minimum active travel levels. This must be measured locally and London-wide, and significant local differences from the target must be highlighted.

Page: [Annex One Town Centre Network](#)

Section: [N/A](#)

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Page: [Annex One Town Centre Network](#)

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Page: [Annex One Town Centre Network](#)

Section: [AN3](#)

Object - Brent Cyclists are horrified by the highlighting of Brent Cross as an area of high growth. All the proposals for Brent Cross area completely unsuitable for active travel, will cause the area to continue to breach air quality guidelines, and will not reduce motor vehicle use. The Mayor must not continue to support developments in Brent Cross as long as they continue to breach London Plan requirements.