

QPARA response to Brent's draft Transport Local Implementation Plan (LIP3)

Arrangements for consultation

1. Brent Council is consulting on this statutory response to The Mayor of London's latest Transport Strategy with a deadline of 30 November 2018.

2. QPARA is not aware of receiving any notification of this consultation from the Council although we are a large and long-established Association who are in frequent contact with the Council on transportation issues. It was only as a result of a tip off from Brent Cyclists that we learned in early November that there was such a consultation.

3. This has given us insufficient time to consider a response properly.

4. The situation has been made more complicated by the consultation process on the draft Local Plan ending 3 January 2019, about which we were informed directly on 8 November. Clearly transport issues should be part of any Local Plan for Brent.

5. We consider that the two consultations should have been linked and subject to the same timetable.

The nature of the LIP3 document

6. Although transport policy affects everyone living in a city and people should be enabled to comment on future plans, this document makes comment unnecessarily difficult. Although it has drawn together much valuable material that is of interest to QPARA, it is significantly repetitive. The "Executive Summary" does not really help, being only one page long for a document of over 100 pages. There is considerable overlap between the first part of Section 2 (local context and changing the transport mix) and the second part (the 9 outcomes of the Mayor's Transport Strategy). For example there are two distinct paragraphs on train stations with step-free access. We suggest that when the document is finalised a more succinct version is made available to the public to provide a context for consideration of schemes as they come forward.

Our comments on the substance

7. That said the following comments are mainly addressed to topics raised by Section 2 but not necessarily in the order in which they occur there.

Projections for population growth

8. The context for the Mayor's Transport Plan and the Brent response is that London's population will grow to 10.5 million by 2041 and within that Brent's population will increase by 20% or 60,000. These may be the current trends but we submit that if realised they would be totally unsustainable, even if growth was only at half the projected level. Therefore policies are urgently needed to plan for new or expanded settlements well outside London and for

the development of major employment nodes at key locations in the outer boroughs. Neither London's roads nor its rail lines could cope with a massive increase of commuting to the centre.

Need for realism

9. Somewhat buried in the draft LIP3 among many worthy but unrealisable aspirations is paragraph 2.4.5.1.3 which reads:

“On current trends, rising car ownership at a rate higher than the Outer London average from a low base³¹ coupled with increasing journey distances³² are set to significantly increase traffic volume. As a consequence, congestion and network disruptions are likely to increase resulting in increasingly unreliable journey times. With the increased travel demand generated by growth already underway, it is anticipated that these issues are being exacerbated in the short to medium term.”

Reducing traffic volumes

10. In QPARA's view this is the problem that has to be attacked head-on. We question the policy statement in 2.4.5.2.1 that the LIP3 is not intended to reduce the total number of trips on the network but on reducing non-essential trips at peak times and reducing pollution. We do strongly support reducing pollution but we consider that for this we need an overall reduction in traffic and not just a re-distribution of the times at which journeys are made.

Reducing commuting by car

11. LIP3 reports that some 120,000 people commute into Brent for work and that some 60,000 of these come by car. It does not say how many drivers commute *through* Brent, e.g. to the centre of London, but we draw attention to the findings in *A Study of Air Quality in Brent*, Imperial College, London, 2018 that 50-60% of morning peak time car drivers in Harlesden High Street and Chamberlayne Road were passing through the Borough. If people are commuting to and through Brent by car then unless they need their car for their work during the day or have a medical or disability reason for using it such use should be dis-incentivised and alternative modes of transport encouraged, including via employers.

12. In this context QPARA believes that small firms are abusing the business permit parking system which allows 3 permits per business without, seemingly, any need to show that the cars are needed for the conduct of the business. A reform of the system is needed.

Reducing travel to school by car

13. The tool provided by School Travel Plans, mentioned in LIP3, is familiar to QPARA and has been the basis for discussions with local schools about the travel modes used by pupils, who hold annual “hands up” surveys. In our view the normal mode should be for pupils to walk to school. We therefore note with concern the LIP3 statement that only around 50% of pupils in Brent walk to school, though we also consider it positive for pupils to cycle. Where neither walking or cycling are feasible pupils should normally use public

transport, accompanied in the case of younger children. In cases where public transport does not meet the needs we strongly recommend that dedicated school buses are owned or hired, not just by private schools as referred to by LIP3 but by any school where more than a handful of parents are taking children to school by car. We ask Brent to promote this approach.

14. It is often stated that school traffic forms only a small part of rush hour traffic and may not therefore be a significant contributor to air pollution or congestion. However common observation is that there is a visible reduction in traffic volumes during school holidays. Part but by no means all of this may be due to commuting parents being away on holiday.

Encouraging walking

15. We would be pleased to see more people walking to work or to take exercise. However we doubt if it should be a priority to spend scarce public money on changing the infrastructure for this purpose. What most residents want to see urgently are repairs to broken and uneven pavements. QPARA considers that the Council should discuss and agree priorities for this work with it. Maintaining safe passage along the footways is surely a basic function of local government, even in these times of constrained expenditure.

Promoting cycling

16. We support encouraging cycling and making it as safe as possible as outlined in the Brent Cycling Plan. Unfortunately the width of many roads in Brent and the need for street parking constitute a major constraint to providing dedicated cycle paths. LIP3 hails the Carlton Vale cycleway scheme as a success but we are not aware of any evaluation showing how much it is used nor whether the special configuration of car parking and bus stops away from the kerb is safe. To help to make cycling safer we suggest that studies are done of key junctions in the Queen's Park area to see how traffic conflicts could be reduced. We respect the role of Brent Cyclists but do not agree with them that it would be safe to remove the central barrier between Chevening Road and Winchester Avenue or provide cut throughs.

Public transport

17. We agree with the broad analysis of LIP3 that Brent south of the North Circular is better served by public transport than the rest of the Borough. This is a natural result of the fact that much of the residential development south of the N Circular consists of late 19th and early 20th century terraced housing of a fairly dense character. Radial bus and rail routes to the centre of London provide for many convenient journeys and waiting times for users are short. Travel by public transport within and across Brent is less easy. Although the main services are mostly well described in LIP3, the overground rail route from Stratford to Richmond and Clapham Junction seems not to be mentioned. After recent improvements it is now well-used and demonstrates the value of a cross rail route through part of the Borough.

Tube and rail

18. QPARA is concerned that the replacement of Bakerloo Line stock from 1972 is not scheduled until 2024 and would wish to know what contingency plans exist if there are serious mechanical defects before 2024.

19. QPARA is also most concerned that at one point LIP3 singles out Northwick Park tube station as the priority in Brent for step-free access. QPARA has led a public campaign for lifts at Queen's Park which is a combined tube and overground station and was originally promised that a scheme would be implemented in 2019. More recently doubt was cast on this promise by Network Rail who own the station. Step-free access is a vital element in enabling people with mobility problems to use tube and rail lines as a way of reducing social isolation. We urge Brent to put more pressure on TfL and Network Rail to make faster progress in this area. We think that LIP3 is mistaken in saying there only 6 stations with step-free access and that Kensal Rise has been overlooked (see 2.2.4.3.12 and 2.4.8.2.5).

Buses

20. QPARA has supported the campaign for cleaner and greener buses to operate in Chamberlayne Road, where currently 12,000 buses pass through every week. We do not consider that current measures go far enough to reduce the air pollution impact of this bus traffic and wish to see a more rapid change to low or zero emission buses in this area. The introduction of a Low Emission Bus Zone would help materially. More generally bus routes in Brent need overhaul with more routes and more frequent buses in the areas north of the North Circular and fewer near empty buses operating through the Kensal Corridor, for example. We understand that TfL are reviewing bus routes and usage with a broad aim of strengthening provision in outer areas and aligning provision more closely with demand. We urge that community voices are heard in this process.

Air pollution

21. We are pleased to see that the problems faced by Brent residents and road users from poor and often illegal air quality are fully recognised by LIP3. We support the use of development control to ensure better air quality in regeneration areas. We recognise that the forthcoming introduction of the ULEZ is referred to. However we find LIP3 seriously deficient because, like Brent's Air Quality Action Plan, it does little to tackle the serious air quality issues in key through routes such as the North Circular, Wembley and Willesden High Roads, the Kilburn High Road, the A 404 through Harlesden and Stonebridge, as well as our more local Salusbury Road and Chamberlayne Road.

Road safety

22. Since road accident death and injury levels are at their lowest for over 50 years, in spite of an enormous growth in traffic, LIP3 should not be surprised that rates of improvement have levelled off. Deaths from air pollution are now around 80 times higher than those from road traffic. Nevertheless QPARA would support the wider introduction of a 20mph zone, especially south of the North Circular. We do though want to see many fewer speed "cushions" which wear badly and contribute to air pollution as drivers brake to go over them.

We wish to see alternative enforcement measures adopted. We consider that for road safety and other reasons a sound transport strategy must give high priority to proper maintenance of road surfaces and other aspects of the existing infrastructure such as road markings and signs. In many cases more is to be gained through this unglamorous work than from new schemes of marginal benefit.

Summary of main QPARA submissions on LIP3

23. We summarise our main concerns as follows:

- Reducing traffic volumes should be the key aim of the Plan and there should be measurable targets;
- Reducing unnecessary commuting to work and school by private car should be the main means of reducing volumes;
- Repairing pavements is a necessary condition of encouraging walking;
- Promoting cycling is supported but measures need careful targeting and monitoring;
- Public transport around Brent needs improvement, while travel to the centre of London is well served;
- QPARA strongly urges the implementation of the inclusion of lifts at Queen's Park station in the Access for All programme for 2019;
- We urge a more rapid move to cleaner and greener buses on the part of TfL, along with a review of routes;
- We wish to see more concerted action to reduce air pollution on Brent's most heavily trafficked routes, including those in the Queen's Park ward, not least for the thousands of children attending schools sited on these routes;
- We support the introduction of a 20mph zone south of the North Circular but do not want enforcement to be through pollution inducing infrastructure.

QPARA Streetscape and Transport Group
Contact; robisharp@googlemail.com

29th November 2018