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To:
Subject: BRENT Reg19 – Neasden and Neasden Stations Growth Area
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Reg19 – Neasden and Neasden Stations Growth Area

(This submission refers mainly to “5.2 EAST PLACE”, with mentions of Church End in “5.5 SOUTH” Place.)

(1) The backs of the buildings on the western side of Neasden town centre and those in Birse Crescent provide perhaps the ugliest views in Brent.

Unfortunately, they are seen by absolutely everyone travelling east on the North Circular Road as it curves around Neasden.

No wonder Neasden is a ‘Private Eye’ joke, represented by the under-performing ‘Neasden Football Club’ which plays in the ‘North Circular Relegation League’. You need to devise a credible, long-term, coherent planning strategy for major improvements to that urban scene, driven by development (housing?) and environmental changes (trees?).

You therefore need to add a sentence to the Local Plan’s East Place section that is sound and positively prepared on this matter.

Presumably land ownership is very fragmented, but it does not necessarily require land assembly, just the hand of firm government with a decent plan there for the next decade or two that will attract investment. This is another case where strategic planning must be seen to be socially useful.

(2) There are various Site Allocations in and around the ‘Neasden Stations Growth Area’. You are also promising us a master plan.

That master plan should stretch to cover the neighbouring ‘Church End Growth Area’ in the “5.5 SOUTH” Place as well.

You say in “POLICY BP2 EAST” and “POLICY BP5 SOUTH” that you will: “safeguard land for the West London Orbital route”

and the former Policy also says:

“...and associated infrastructure”.

(Why the difference?)

How will you do that safeguarding? Is it only public land that is involved?

Regarding the Growth Area, you need to add a couple of positive sentences to the Local Plan that give a sound steer to your promised master plan, and document certain reasonable possibilities and constraints for the area.

The unique selling proposition of the Growth Area is the combination of:

- a grade-separated junction with a major road, the North Circular Road, and being near to:

- two rail/tube stations virtually at right-angles that give easy rail access to much of north and west London (and beyond).

You say you have tried in the past to connect the North Circular Road access road, Great Central Way, to Neasden Lane. That is surely no longer a desirable policy, at least for general traffic.

One speculative option, which should be mentioned as sound and positive in the Local Plan, is to consider at least some of the area as two vertical layers:

The lower level would provide high-ceilinged logistics warehousing, directly connected to the North Circular Road (meaning Great Central Way) to the north. It would have no road access to the south but would provide, from its nearby connection to the M1 motorway, a storage and transfer site for ‘last mile’ delivery in London.

Above that, on a concrete raft, and lowering to ground level further away, would be housing, lots of it, and with new minor local retail at a district centre. These housing units would be overwhelmingly no-car developments, and with no road access to the north.

It is difficult to speculate further without knowing land datum levels, but easy access to the stations would be integral to the whole Growth Area development.

The railway lines provide either:

- unwelcome barriers and severance,

or:

- exciting opportunities for architects to devise solutions.

It is not clear if the logistics industry and the large housing providers would be at all interested in such a concept, given the separate and non-synchronised commercial risks that their activities carry.

However, you should market-test the concept, hold developer workshops and encourage consortia to form, to allow competitive bidding.

There would have to be no detrimental effect on the retail centres of Neasden town centre and Church End, but those would expect to be boosted by more local demand.

Church End's Church Road is undoubtedly the poorest and most unattractive retail road in Brent (*isn't it?*).

However, I submit that Site Allocation: "BSSA3: CHURCH END LOCAL CENTRE" is unsound, because it is not justified by evidence. I oppose your blanket requirement:

"Redevelopment will need to retain active frontages at ground floor".

There are too many shops in any rational retail analysis of that section of Church Road. Let the ones on the south side be boosted by removing those on the north side. The car tyre shop on the south side is also inappropriate, with its power cables and air lines running across the pavement, or sometimes above head-height on sticks of wood. It needs support to relocate locally.

Regarding integrating 'Neasden Stations Growth Area' development with the various railway lines, there needs to be a thorough analysis of the likely rail corridor needs there over the next 50 years (to deliberately and provocatively breach the quoted end-date of the current Local Plan).

Neasden Underground station is on the Jubilee Line, with other platforms for the Metropolitan Line which are not used. If the Growth Area booms and the West London Orbital is successful, it would be possible to change that through-running, if only during off-peak or late at night, rather like Piccadilly Line trains sometimes stop at Turnham Green District Line station.

For heavy rail, the (only) route out of London Marylebone splits in two just south of Neasden's North Circular Road girder bridges. The western arm from there is the Chiltern Main Line to Birmingham (originally Sheffield) and the north-western arm is the less-important Chiltern Aylesbury Branch, which continues to run alongside the Metropolitan/Jubilee Lines, first stop Harrow-on-the-Hill.

The Dudding Hill Freight Line crosses those heavy rail and Underground tracks at right angles just south of Neasden station on a four-track-abutment bridge, with only two tracks being fitted with spans.

Finally, there is a descending single-track chord, from the Dudding Hill Line south to the Chiltern Main Line west. Current track layout stops trains reaching the Chiltern Aylesbury Branch.

While there is a physical connection to the Chiltern Main Line, the chord is mainly used as a reception siding for mineral trains that then reverse into the Great

Central Way cement works' sidings, on the inside of the chord's curve.

It seems possible that those sidings could be directly connected (again) to the Dudding Hill Line at their other end. That would make the chord totally unused commercially, although Network Rail would no doubt want to maintain the link for stock and maintenance trains.

The most important passive provision required in the master plan that follows the Local Plan is to protect the possibility, however distant, of a 1990s-planned flyover from the Dudding Hill chord to the Chiltern Aylesbury Branch.

Such a flyover south of the North Circular Road avoids any flat junction across the Chiltern Main Line, which is already at capacity. You should research the history of that provision.

It is not acceptable to totally rely on strategic planning by Network Rail, which is sometimes opportunistic in pursuing merely short-term gains. There seems no great strategy at the Department for Transport either.

An example was the lack of support for a fit-for-purpose, high-capacity Dudding Hill Line connection at any Brent Cross station on the Midland Main Line. That situation was only reversed by accusing Network Rail of maladministration, non-compliance with the Nolan Principles of Public Life, and by threatening to take it to the high court.

John Cox