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To:
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Reg19: Transport issues

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(1) Every map in the Local Plan should show the borough's railways.

You have never offered any valid justification not to. Doing so does not make the maps too crowded.

Having them also emphasises the close strategic link between land use and fixed transport infrastructure. Historically, construction happened on green-field land around Brent's railway stations from the 1830s to the 1930s. It has been mainly reuse of brown-field land since then. However, for future strategic planning, showing both the interconnection of Brent's districts by railways and the severance that the railway lines often create are both important.

The only map in the Local Plan to show railway lines is, ironically, where they don't matter, in Figure 38: "*Existing and Proposed Cycling Routes*" on page 371.

Unfortunately, that map is poor quality, showing the lossy artefacts of maybe a reused JPG file. Replace it with a sharpened, loss-free image.

All maps in the Local Plan should show a thin black line for every railway corridor and small black blobs for stations. None of that intrudes on valid reasons you may have for showing particular maps on particular pages.

(2) Dudding Hill Freight Line upgrade:

You support the intended reopening of the orbital Dudding Hill Freight Line across Brent for regular passenger traffic, sometime in the 2020s. (It closed in 1902.)

Although you make optimistic comments in the "6.8: TRANSPORT" section paragraph 6.8.6, earlier mentions in the Local Plan are underwhelming, and this submission mainly tackles those.

Incidentally, in 6.8.6, change:

"Cross rail"

to:

"Crossrail, Great Western Main Line".

The Dudding Hill Line project is ultimately governed and promoted by the 'West London Alliance' of boroughs, including Ealing, Harrow, Brent and (somewhat reluctantly) Barnet. The reopening is in the Mayor's Transport Strategy and the Draft New London Plan (Table 10.1). It has a favourable 'Strategic Outline Business Case' (published by Transport for London in June 2019).

There is a "3: BRENT'S CHARACTERISTICS" section of your Local Plan.

Within that is a "SUSTAINABLE INFRASTRUCTURE" subsection, where you develop a narrative leading to your list of "Challenges" in paragraph 3.35.

As your 'Long-Term Transport Strategy' supporting document points out:

"... Brent has limited control over public transport within the borough, however provision of good services is important to achieving the objectives of this strategy."

Brent wishes to see two new stations on the Dudding Hill Line, at Harlesden and Neasden. However, Paragraph 3.33 only mentions the latter. Why, since both are shown on Figure 6: “*Brent Key Diagram*”?

There is a public perception that, if things get tough, provision of the Neasden station is more important than that of the Harlesden one. You must give them equality of esteem.

On another issue, Brent has asserted that Dudding Hill Line stations should have passive provision for 8-car passenger trains in the future. That means not just 4-car platforms for short London Overground trains under the Mayor’s ‘West London Orbital’ branding. You do not seem to mention that now.

Capability for longer-distance, inter-regional, trains at a later stage of the Dudding Hill Line reopening is a sound and positive-prepared aspiration for the borough. It cannot be rejected as being ‘an ambition without sound evidence’ or ‘beyond the Plan period’ anyway. We have a Climate Emergency. Strategic planning ought to have a social usefulness.

Such services would require a train operating company either to spontaneously see a market opportunity, or to be mandated to provide the service by the Department for Transport. The latter would happen as part of a future train franchise or because of a peoples’ railway, depending on who wins the next few general elections.

As opposed to new West London Orbital trains between Hounslow/Kew Bridge and Hendon/West Hampstead, such longer-distance trains would be analogous to the existing tangential train service that already greatly benefits Brent.

It is the popular, often overcrowded, half-hourly ‘Southern’ service between Milton Keynes and South Croydon via Clapham Junction (sometimes extended to Gatwick airport and Brighton) which calls at Wembley Central station.

With known railway lines planned or being built, the Dudding Hill Line might one day support, say, a Guildford-Harlesden-Neasden-Cambridge service. It would never be the quickest end-to-end route, but it might run via Heathrow Airport, and so make up for that by providing an airport service avoiding changing trains. It would clearly benefit the connectivity of Brent’s Growth Areas, whether via the airport or not, and help modal shift away from cars, helping marginally to avoid building the Oxford-Cambridge Expressway.

For transparency, you should explain what you have variously stated, at the current ‘formative stage’ of the last three years, about the possible nature and number of Brent’s Dudding Hill Line stations and their platforms.

To encourage borough-borough infrastructure cooperation, your “3: *Brent’s Characteristics*” section of the Local Plan has a “*DEVELOPMENT PARTNERSHIPS AND INFRASTRUCTURE*” subsection, which is paragraph 3.36.

In that respect, you should note that in September 2019, LB Barnet completed a £50,000 Capita study on the integration of 8-car platforms for Dudding Hill Line trains into its proposed Brent Cross West Thameslink station. (It took two years of our lobbying to get it to do that.) Barnet has now given Capita another budget of £50,000 to choose between two different designs.

At the other, south end of the Dudding Hill Line is Old Oak Common, for interchange with HS2, Crossrail and all Great Western Main Line trains (because all Paddington trains will stop there).

It seems inevitable that LB Ealing and the OPDC will expect TfL to deliver 8-car platforms at its proposed Old Oak Common Lane station on all routes, given that they are already confirmed for the North London Line platforms there.

Back to Brent: The Local Plan does not seem to mention passive provision at

Brent's Dudding Hill Line stations for 8-car platforms.

The Plan is therefore not sound, because it would be more positively prepared if it did. It would better meet the area's objectively-assessed long-term needs. You therefore must add the 8-car wording in part of the narrative. It does not, of course, have to be in formal policy.

An important point is that the various boroughs must effectively devise policy themselves and can only jointly administer it. The West London Alliance has created a grandly named 'West London Economic Prosperity Board' to develop what it calls the 'West London Orbital' project, now promoted as: **"Go with the WLO!"** (*Good grief.*)

However, the Local Democracy, Economic Development and Construction Act 2009 does not operate in London, and the WLEPB is a courtesy title only and merely a bog-standard joint committee under the Local Government Act 1972 Section 102, little different from the joint committee of Brent and Barnet that administers the Welsh Harp.

Strategic planning policy remains with the boroughs' Local Plans and is not affected by the Local Authorities (Arrangements for the Discharge of Functions) (England) Regulations 2012.

You should not try and kick Brent's soundly-based aspirations for Dudding Hill Line stations upstairs to the WLEPB. They lie with you.

(3) Willesden Junction station:

Although mostly in Brent, this station is now within the planning boundary of the Old Oak and Park Royal Development Corporation. However, there should be passive provision within other parts of Brent for certain related matters.

Network Rail is considering a major redevelopment at Willesden Junction (with at least four 30-storey commercial or housing blocks, for instance). This would allow wholesale rebuilding of the station.

The Harlesden Neighbourhood Forum, plus myself, have met Network Rail at a senior level, and, for instance, we expect to receive direct copies of further analysis of Willesden Junction at the same time as it is presented to the OPDC board (perhaps with more financial redaction for us if there is exempt material). Alongside other issues, NR has agreed to consider providing passive provision for four Low-Level through-platforms at Willesden Junction, four High-Level through-platforms with a ticket office directly on the A404 Harlesden High Street, and additional West Coast Main Line and Milton Keynes-Croydon train platforms. Extra platforms provide positively-prepared soundness, if there develops a booming OPDC development area over the next two or three decades (it is all rather dead as a parrot just now).

One possibility for greater capacity and connectivity in such a golden future is to extend some or all Barking-Gospel trains to terminate at Willesden Junction High-Level.

Another possibility is to extend some East London Line trains from Highbury & Islington though to Willesden Junction Low Level via Primrose Hill and Queens Park.

The third possibility, crucially requiring a Local Plan change, is to passively provide for a new chord at Northwick Park, to allow Chiltern Aylesbury Branch trains via Harrow-on-the-Hill to run through Wembley Central and terminate at Willesden Junction Low Level.

This needs to be mentioned in the narrative of the "5.4: NORTH WEST" Place if you wish that section to be sound and positively prepared, providing Buckinghamshire passengers with a direct route to Old Oak Common and also an

imperfect interchange with Crossrail, including to Heathrow airport. Such a chord would drop down from the east of Northwick Park station (there are currently no platforms on the Chiltern tracks) and join the Watford Junction-London Euston DC Line, possibly at a grade-separated junction. This area is currently metropolitan open land, but a small triangle of it would be needed. Such a link would also improve interchange between these two rail lines for Brent and Harrow residents generally.

(4) Wembley Park station:

You are reminded that Crossrail Ltd. in the early 1990s protected the Dudding Hill Line and projected a flyover across the Chiltern Main Line at what is now the 'Neasden Stations Growth Area' to the Chiltern Aylesbury Branch.

The latter passenger route will soon be extended to reach the reopening Oxford-Cambridge Line and eventually Silicon Fen.

Although those Parliamentary rights have lapsed, the Local Plan should protect them in the promised masterplan for "Neasden Stations".

That lies within the "5.2 EAST PLACE", but is on the border with the "5.5 SOUTH" place. (*What happened to the word "PLACE" on page 149? There is room for it!*)

Funding for that masterplan has just been boosted by a successful bid to the City of London-administered 'Strategic Investment Pot', which is money obtained from retained business rates. There is £960,000 available, allocated to 'West London Orbital boroughs' according to the number of stations, the extent of housing and employment growth, and the expected incremental increase in business rates.

The '1990s rights' provide an alternative route to reach Old Oak Common and Crossrail from Buckinghamshire.

This alternative would need to be compared by Brent planners at this formative stage with the possible Northwick Park chord mentioned as a possible connection to Willesden Junction Low-Level station. Both routes would never be needed, but passive provision is required in any "Neasden Stations Growth Area" development. It would provide a faster commuter service, but maybe be more expensive. It needs mentioning in the Local Plan narrative.

Like in the 1990s, any future project would very likely add new platforms on the Chiltern Aylesbury Branch at Wembley Park station, an immediate benefit to Brent.

It would provide a choice for Aylesbury and other passengers between continuing to reach Marylebone station and a new, easy interchange with Crossrail to central London via the Dudding Hill Line and TfL's proposed Old Oak Common Lane station.

For this possibility, I oppose Site Allocation "BCSA7 WEMBLEY PARK STATION (SOUTH)" on page 64, because it is not sound or positively prepared. This is within "5.1: CENTRAL PLACE".

Apparently, London Underground own this land. They should not be allowed to develop any of it until the width of a necessary strip of land on its eastern edge is determined and is justifiably protected. That is in conformity with the protection of operational railway land in the Consolidated Version of the Draft New London Plan of July 2019.

This is a case of a local authority, Brent, protecting Transport for London from lopping off a limb and feeding on itself.

(5) Orbital Strategic Transport Corridors:

You have defined the expression: "Intensification Corridor" because you find the

term useful. (Or more precisely, you are using the expression throughout the Local Plan but have not actually defined it.)

Its use in the Local Plan is sound.

However, so would another one to add to the Glossary, which I call (because I can):

“Orbital Strategic Transport Corridor”.

It is sound because it is compliant with orbital travel provision promoted in the Consolidated Version of the Draft New London Plan of July 2019, and can be seen as Brent’s response to such policy.

The inner-most OSTC in Brent is the North London Line, a mature corridor continually being improved. Being called an OSTC is something of a truism, and no-one will notice.

The next OSTC in Brent is the Dudding Hill Line, currently subject to potential reopening for regular long- and short-distance passenger services. Brent is already contributing time and money to further this aim. Calling it an OSTC is just a background strategic planning rebranding, although entirely appropriate and sound. It also connects end-on with what might be gingerly called ‘OSTCs’ in Hounslow and Ealing, and a few metres on the eastern side of the A5 Edgware Road in Barnet.

A third OSTC is justified in the Local Plan and would be sound and positively prepared. It is A4006 Kenton Road, along the border with Harrow, continuing as the A4006 Kingsbury Road eastwards to the A5 Edgware Road.

West-to-east, this affects the “5.4 NORTH-WEST” Place and the “5.3 NORTH PLACE”.

(You seem to slip the word “PLACE” into the Local Plan section names only if it fits. But even then, you sometimes forget!)

Acceptance of OSTC3 implies that you accept the concept is positively prepared, likely to provide a strategy to study and potentially meet north Brent’s objectively assessed needs. It would be informed by future agreements bilaterally and within the West London Alliance, so that unmet need from neighbouring boroughs can be accommodated. It is consistent with achieving sustainable development and modal shift away from the private car.

There is no other obvious route for an OSTC across outer north-west London. It is far enough out...

that it meets a perceived need in north Brent, something which, say, the Dudding Hill Line or the North Circular Road cannot.

It is far enough in...

that potential passenger densities are probably high enough for fixed-infrastructure intervention. That would apply if just a few extra buses were concluded, after detailed study, not to provide an adequate transport solution to what might be condensed down to a legitimate transport problem.

An analogy I would make is with current studies to provide a ‘Sutton Link’ in south-west London. That has now progressed to a public consultation on either guided electric buses and on-road trams. It seems that trams have won the day.

A choice of transport hardware for OSTC3, including ordinary buses, would similarly only be made much later than Local Plan initial studies by Brent (‘=Sutton’) and hopefully Harrow (‘=Merton’).

Its inclusion in the Brent Local Plan in short narrative form would be sound.

OSTC3’s unique selling proposition would be that it would interconnect the various existing radial rail routes. Extending over borders somewhat, it would connect **Harrow-on-the Hill station** and Harrow town centre,

Northwick Park Hospital,

Kenton station,

Colindale station,

then either **Hendon Thameslink station** (where LB Barnet expects the West London Orbital service will terminate, but too far in reality),

or **Colindale station** and then a Barnet-proposed **Aerodrome Road/RAF Museum station** (where LB Barnet would like the West London Orbital service to be extended to, and which the borough promoted in its Local Implementation Plan to TfL).

Note that Barnet mirrored the concept of a Local Plan OSTC3 by defining what would be an end-on connection to one of its own

“Improved Orbital Links”

(the only other one it defines is the North Circular Road) in its publicly consulted ‘Draft Barnet Growth Plan’

published earlier in 2019. That ticks another box.

The Barnet Growth Plan’s ‘Improved Orbital Link’ would continue to **Mill Hill East station** and **Finchley Central station**.

Any eventual fixed infrastructure along OSTC3 could potentially be on-road and segregated tram tracks. The corridor is potentially wide enough for segregated cycle lanes as well for its whole length. Some segregated lanes have just installed by Brent along Kingsbury Road.

With the climate emergency, soundness does not have to demand detailed evidence for something a couple of decades from implementation. Anyway, a future panicked population demanding urgent climate change measures make sustainable transport timescales hugely volatile.

Nevertheless, I assert it is for Brent’s Local Plan to mention, document and promote OSTC3.

By doing so, and cooperating with Harrow in particular, it can lobby within the West London Alliance. It can try to firm up a specific project to appear in the next Mayor’s Transport Strategy, or the one after that, or the one after that.

(6) Wembley Park Station sidings:

I oppose Site Allocation “BCSA7 WEMBLEY PARK STATION (NORTH)” on page 64, because it is not sound. This is within “5.1: CENTRAL PLACE”.

These redundant railway sidings are owned, not surprisingly, by London Underground. TfL should not be allowed to develop any of this operational railway land, because it is protected for possible future passenger use, even in the distant future, by the Mayor’s policies in the Consolidated Version of the Draft New London Plan of July 2019.

I know that. The reason I know is because I spoke at the London Plan Examination in Public, supporting the Mayor’s position and opposing the freight industry’s witnesses. The later-released London Plan Panel’s report has not suggested changing anything.

Protection of the land does not depend on exactly defining a future transport use. Nevertheless, BCSA7 would be a suitable site for a maintenance and stabling depot for a future orbital North London Tram system.

The land is already in public ownership. Brent should demand it stays that way, and force TfL to stop illegitimately devouring itself for short-term cash, something which would be an unsound strategic policy within Brent.

(7) Chiltern Main Line stations

In paragraph 5.7.11, change:

“Sudbury & Harrow rail station”

To:

“Sudbury & Harrow Road station”

Some years, this is the least used railway station in Greater London. It only has four trains into London Marylebone in the morning peak, and four trains out of Marylebone in the evening peak. The station environment is poor.

The Local Plan narrative should mention that the proposed diversion of many Chiltern commuter trains at South Ruislip, via rebuilt Greenford and North Acton stations.

Trains would run to a two-track terminus at Old Oak Common station, squeezed between the HS2 and the Crossrail/Great Western Main Line platforms. That would reduce pressure on the Chiltern Main Line and more trains could stop.

Within *“5.1 CENTRAL PLACE”*, ***Wembley Stadium station*** is also mentioned, but it has very low visibility for routine use. People ignore it.

It is hampered rather than helped by being located on the modern and iconic *“White Horse Bridge”*. The Local Plan section should mention the current situation and a desire by the borough to improve matters.

John Cox