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To:
Subject: BRENT Reg19 – Wembley and Wembley Park
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Reg19 – Wembley and Wembley Park

This submission concerns “5.7: SOUTH WEST” Place but skirts the edge of “5.1: CENTRAL PLACE” as well.

(1) The Local Plan in regard to the immediate ‘town centre’ area around Wembley Central station is unsound, because it is not positively prepared.

In fact, it is hardly prepared at all.

Although there might be more important issues in the Local Plan (like housing numbers and their tenure) I think your spatial failures at Wembley Central – failures in plain sight – are the worst in the whole plan.

You are not allowing your strategic planning powers to maximise social benefit and in a location where attracting private-sector investment is perfectly possible. The pre-Victorian, inter-city West Coast Main Line (as it now is) was insufficiently well capitalised to venture very close to existing settlements. Thus, when London suburban stations eventually followed, they were generally on bridges in the middle of nowhere, with unambitious development then proceeding around them. The later, better-funded Metropolitan/Jubilee Line railway line deliberately aimed at towns on its route, and also profitably cross-funded development where there wasn't any already.

Brent's third radial railway, the Great Central, was mainly concerned with being competitive in reaching Sheffield and Manchester, not with providing London suburban stations.

Brent's WCML stations have little sense of place:

- Queens Park: no (but achieved instead by a wealthy high street to the north)
- Kensal Green: no
- Willesden Junction: no
- Harlesden: no
- Stonebridge Park: no
- Wembley Central: NO
- North Wembley: no
- South Kenton: no
- Kenton: no.

There is nothing more damning than criticising you for failing to be strategic!

The WCML needs a town centre somewhere along it, so that the line performs a commercial but particularly a social function, as the Jubilee Line does all day. That has to be Wembley Central.

It should be a town centre of attractive, wide pavements, trees (trees!) and human activity and lingering. All we have is the activity, nothing much else, and often seemingly only to get somewhere better like Wembley Park.

To overquote the columnist Simon Jenkins this week:

“High streets are seen by planners as places where people shop. They are not. In their winding, funky idiosyncrasy, they are places of character, where people congregate, communicate and feel at home in company. They are human constructs.

...

If there is social wrong that cries out for a solution it is personal isolation. The bonds that once held people of all ages in the embrace of neighbourhood and community are snapping. This stretches from the Facebook agonies of the young to the greatest curse of old age, not ill-health, but loneliness.

...

That magnet now must become the craving to congregate, the search for company and enjoyment."

Point out those ideas at Wembley Central and where are the sound Local Plan policies to promote that function and transformation?

Wembley High Road itself is at capacity. Bridgewater Road was built in 1929 as a bypass for it, in order to reach the new North Circular Road.

Policies within "5.7: SOUTH WEST" Place on the "Wembley Growth Area" are unsound, because they may be positively prepared, but they are not positively prepared enough.

They should promote development of Wembley High Road east of Ealing Road as an important town centre place. As the previous Mayor's 'Roads Taskforce' would have said, give the road a sense of Place, not just one of Movement. Such thoughts also permeate the Draft New London Plan.

This so-called town centre also has an important role in accommodating Wembley Stadium and Wembley Arena visitors traversing the pavements to their destinations and benefitting local businesses on the way.

In practice, you need to consider closing side roads on to Wembley High Road, including making Ealing Road a T-junction, not a crossroads. Side roads may need interconnecting in new ways to meet legitimate local residential requirements. Planning gain money must be directed towards that.

Building lines need to be taken further back from the kerbs, to create a better environment. Give developers more height in return.

It is pathetic that there are still single-storey shops within a few metres of Wembley Central station. Encourage development to sweep them away.

The impressive staircase in the new mixed scheme to the **south-west** of the station is a sign of what development can achieve. But you were too hesitant about taking back the building line on the main road there, presumably because you were pessimistic any better new building line could be continued on either side.

Instead, in that scheme you have allowed a little set-back at ground level (good-ish) but concrete columns in that extra space to support upper floors (bad).

This is an excellent example of hesitation by you on what you might want to achieve. Be bolder with building lines! (Even if there have to be temporary structures to avoid sudden hidden corners.)

There needs to be a new Site Allocation for the removal of the low-grade shops between the existing station plaza and that new south-western-side development. There also needs to be a big new Site Allocation on the **north-west** corner of the high road, taking in most the land of the adopted service road at the back of the shops, and possibly including all the houses on the south side of Turton Road (which would surely be blocked from sunlight after major development otherwise). Unfortunately, and again due to lack of sound and consistent strategy on your part, there already one new small development on that north-western section of the high road (and it is a perfectly attractive building). Therefore, any new, larger development would have to fit around it.

I am not suggesting removing any of the substantial, even prestigious buildings on the section of Wembley High Road between Ealing Road (a future T-junction from

the south) and Park Lane (the current T-junction from the north). That includes near to Lancelot Road, which I would close and give a new connection via side roads further north.

You should, however, consider including the northern-side shops above the railway tracks in the major Site Allocation I mentioned, because this gives a chance to take back the building line on an even longer stretch of pavement. The obvious problem with such possible developments is land assembly. But that is what you are there for – to facilitate such matters for the public good.

(2) Wembley High Road between Park Lane and Wembley Hill Road (Wembley Triangle) is where visitors to the Stadium and Arena from Wembley Central station will most likely cross the road.

That does not all have to happen at one point, because businesses on both sides need to benefit from the footfall. This requirement should be explicitly stated in the Local Plan as a function of this stretch of road.

There is already a “*Site Allocation BSWSA8*” on the northern side. The “*Planning Considerations*” need changing, to specify that a consistently wide pavement is needed. That will be achieved by taking back the building line at the eastern end of the site and also in Wembley Hill Road.

(3) Specification of remodelled road junctions must be a planning function, not just a technical one for traffic engineers.

The proposed new ‘T-junction’ at Wembley Triangle must be publicly consulted on. The aim should be to de-emphasise the straightness of A404 Wembley High Road (it is called A404 Harrow Road eastwards from there).

Instead, there should be a build-out, anything up to giving the three roads at the junction equal priority visually (even if traffic lights for ‘straight on’ prioritises the A404 traffic above other phases).

This change from what you currently have planned gives a more attractive street scene for pedestrians, including those who have yet to cross the A404 main road from Wembley Central station, on their way to the Stadium and Arena.

Any remodelling there should also try to sign-post the nearby Wembley Stadium station, for A404 road traffic, cyclists and pedestrians.

You may also be remodelling the junction of Wembley Park Drive and Empire Way. Again, that should involve public consultation.

You need to weigh up there the cases of giving Wembley Park Drive the ‘straight route’ at any T-junction, the same for Empire Way instead, or thirdly, offering another ‘three-equal-legs’ of a junction (even if traffic lights again favour two of the three roads).

In all such examples of your junction remodelling, the needs of cyclists on segregated cycle paths and of pedestrians must be uppermost in your minds, not just pure road traffic throughput.

John Cox