

**MARKS AND SPENCERS, 492-498 HIGH ROAD,  
WEMBLEY, HA9 7BN**

PLANNING STATEMENT

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7<sup>th</sup> November 2005

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## SUMMARY

This Planning Statement has been produced as informal guidance to act as a response to the closure of the Marks and Spencers store on Wembley High Road to guide the future development of this Town Centre site. A summary of the key principles and objectives of development on the Marks and Spencers site is outlined below. The council wishes to:

- Maintain the current store in a single retail use;
- Maintain office and basement uses where needed to support a single retail use;
- Encourage appropriate town centre uses if feasible at first floor level;
- Allow residential uses at upper levels;
- Allow up to 5 storeys of development;
- Consider a comprehensive redevelopment of the wider 492-500 High Road site (and adjoining sites) if it improves the retail offer in the town centre; and
- Ensure that development purely on the M&S part of the building does not prejudice development of the adjacent site.

## DOCUMENT AIMS / STATUS

This Planning Statement has been produced to provide a guide for potential applicants on the Local Planning Authority's requirements and expectations for the Marks and Spencers Site. This statement provides informal guidance only. A full SPD with a Sustainability Appraisal is not practicable due to the short time-scale involved. Consultation on the statement will be limited, but this Planning Statement will be approved by the council's Planning Committee in November 2005. The statement clarifies the framework that will be used to assess any planning application(s). The statement does not bind the council to grant consent for any particular development on the site.

This Planning Statement has been released in draft form to assist potential developers. Please note that the council will update this document regularly from its first release on the 22<sup>nd</sup> August. Developers should check with the Planning Service to ensure that they have the latest revision.

## 1.0 INTRODUCTION

### 1.1 VISION & OBJECTIVES

There are four possibilities for the redevelopment of the site which are illustrated in section 2.0 and listed in table 1.1 below:

Type	Option	Description
Partial Redevelopment	A	Retaining existing structure but building over M&S owned areas of the roof space only
	B	Same as 'A' but also building over the roof space of the Job Centre
	C	Redevelopment of the whole M&S site
Comprehensive Redevelopment	D	Comprehensive redevelopment of the M&S site and the adjacent units/buildings (500-506 High Road and the Job Centre)

Table 1.1: Development Options

The overall vision for future use of the site is to provide a high quality modern mixed use development including retail at ground level with the upper floors consisting of a mixture of uses including offices, restaurant/banqueting, health, library, residential and A2 uses. Ideally the existing Marks and Spencers unit should be maintained as a single unit to attract a major retailer to the site to enhance the retail offer of Wembley Town Centre.

A high quality development at this location, together with other planned improvements to the High Road, the new Stadium and associated developments, will contribute towards the regeneration of the Wembley Area as a whole. The good public transport links to the site provide an excellent opportunity to achieve a higher density mixed use redevelopment scheme.

The main development objectives are:

- To deliver a building of exceptional architectural quality;
- To provide a mix of uses appropriate to a town centre location;
- To enhance the townscape of the High Road;
- To maintain the amenity of residents in Elm Road;
- To create an active frontage onto the High Road; and
- To ensure that development takes account of sustainability issues including guidelines set out in SPG19.

The specific design and development elements that should be considered and incorporated into any redevelopment or extension plans are outlined in the following section.

## 1.2 BACKGROUND

### Site Location

The Marks and Spencers (M&S) site is located in the middle section of Wembley High Road in Wembley Town Centre.



Figure 1: Location Plan – indicative only

It is approximately 0.22 hectares in size and is a three storey premises with a large retail unit fronting Wembley High Road. The ground and basement levels of the unit are currently in use as a M&S retail store with the basement in use for storage. However M&S vacated the site on 13<sup>th</sup> August 2005, leaving the site vacant and therefore suitable for re-use/re-development.



Figure 2: M&S Frontage onto High Road

The first and second floor of the High Road frontage are utilised as offices. To the rear at ground level are parking spaces, a service yard and loading bay accessed off Elm Road. Parking for 22 vehicles is available to the rear of the site and plant equipment exist for the retail unit at roof level to the rear. The strip of land between the site and the boundary of Elm Road is publicly owned (designated public highway) and is used as a car park, public conveniences and a landscaped area.



Figure 3: Rear of site including loading bay, car park, landscaped public highway and Job Centre

### Surroundings

Boots the Chemist and Bradford & Bingley occupy the retail units directly adjacent to the site with offices/ residential in the units above. To the rear of the site facing onto St John's Road is a Job Centre. Both Boots and the Job Centre are not owned by M&S.

Elm Road to the rear is characterised by primarily two storey residential dwellings facing onto a parking area which is allocated as a Major Opportunity Site in the Adopted Brent UDP 2004 (WEM28a). Planning permission has been granted on the site for a predominantly residential development (varying in height between 3 and 11 storeys) providing 48 affordable flats and 79 private flats with 249 car-parking spaces (including a 100 space town centre public pay and display car park).

The M&S site has very good private and public transport links. Wembley High Road is a designated London Distributor Road and is part of the London Bus Priority Network. Wembley Central Station is less than a minutes walk from the unit which is served by the Bakerloo Line and has national rail links to central London and to outer suburban areas.

#### Site History

Marks and Spencers has occupied the site since the early 1950s, before which it was subdivided into smaller retail units. The site is part of the designated Primary Shopping Frontage and is classed as Use Class A1. The front part of the upper floors were altered to provide office space in 1954. A rear extension to the building was approved in 1983 the use of which for employment services was granted in 1991.

### 1.3 POLICY

#### Site Specific Policies

Wembley is identified as a Major Centre, Opportunity Area and Regeneration Area in the Adopted London Plan (2004). The Brent Unitary Development Plan (UDP) Adopted in 2004 identifies Wembley as one of its two Major Town Centres. The overriding objective of the council is to maintain and enhance the vitality and viability of established town centres. Major Town Centres are the first preference for the location of new retail development in line with Government guidance set out in Planning Policy Statement 6 (PPS6) 2005. Within Wembley Town Centre proposals for its diversification and regeneration are supported provided they are consistent with other policies (policy WEM21).

The site forms part of the Primary Shopping Frontage on Wembley High Road. Policies SH6 and SH7 restrict change of use on the ground floor from class A1 retail to non-retail uses such as to financial and professional services (class A2) or food and drink (class A3). A non-retail use on the ground floor of this site is not acceptable as it would conflict with policy SH7 (b) - creating a continuous non retail frontage in a key part of the primary frontage.

In addition to this, policy SH3 requires proposals to be consistent with the scale and function of the centre within which they are located and rear servicing is also sought in the town centre (policy WEM21 and SH19).

The site is within the National Stadium Policy Area, where, the regeneration of the existing town centre is supported (policy WEM1), in addition to the promotion of the regeneration of the Wembley area as a regional sport, entertainment and leisure destination. Higher density residential development is encouraged in the Wembley Regeneration Area, in particular within Wembley Town Centre. Developments of 15 units or more should provide a mix of market housing and affordable housing (policy WEM4).

Wembley Town Centre is in an area of very good public transport accessibility and has a PTAL score of 6 (policy TRN6 and policy BE11). At such locations proposals for higher residential densities are accepted and should include a mix of compatible

land uses. Particular attention should be paid to the design of such developments to ensure that the amenity of adjoining and proposed residents is protected.

### Design Policies

The main thrust of the design policies is to secure a higher standard of architectural and urban design for all development and to promote a sustainable, fully accessible and safe environment. Policy BE1 requires all new developments to submit an 'Urban Design Statement'. Proposals should also have regard to their local context and make a positive contribution to the character of the area (policy BE2). Developments should also:

- be accessible to disabled people (policy BE4);
- designed to be understandable to users and reduce opportunities for crime (policy BE5);
- include appropriate landscaping (policy BE6);
- contribute positively to the streetscape (policy BE7);
- conserve energy through the use of low energy or renewable lighting systems (policy BE8);
- demonstrate a creative and appropriate design solution, specific to their sites shape, size, location and development opportunities (policy BE9); and
- embody sustainable design principles including sustainable design, construction and pollution control (policy BE12).

Wembley High Road lies within an area of low townscape quality as defined in map BE1 of the UDP. Development in these areas should have regard to any approved Enhancement Strategy for the area and make a positive design statement (policy BE13). SPG17 encourages new developments on prominent streets to emphasise their location through the composition of building scale, massing and elevational design.

In general, all new shopping developments should be capable of operation without adverse effects on the local environment and upon the amenity of local residents. Developments should be of a high standard of design in keeping with the existing character of the area. Development should be orientated towards Wembley High Road to accord with policy SH20. The design of any new shopfronts are required to: respect the shopfront designs of adjoining properties; avoid excessive advertising and notably that encroaching upon upper stories; and have appropriate materials and proportions (policy SH21).

A complete list of relevant policies is provided at section 3.0.



## 2.0 DEVELOPMENT PRINCIPLES

### 2.1 LAND USES

The objective is to create a mixed use scheme that is vibrant and attractive to residents and visitors alike. The mixed use scheme should retain a single ground floor retail unit fronting onto the High Road.

The council is concerned that there are few large retail stores in the town centre and those that are there should be retained in order to contribute to the viability of the town centre. Through policy SH2 the council requires planning proposals to support the maintenance and improvement of the shopping and other facilities in Major Town Centres. Therefore council requires that the current M&S store should be retained as a single retail unit and will only be permitted to be split into smaller units where the applicant can demonstrate that there are no potential tenants for the existing single M&S unit. Developers would need to provide documentary evidence of marketing the site over a prolonged period (up to 18 months). The council also particularly encourages food retailing at this site.

Potential acceptable uses for upper floors could include a mix of the following:

- banqueting/ restaurant facilities;
- offices;
- residential;
- health centre;
- library and community uses; and
- A2 class uses (financial & professional services).

#### Housing

Policy H3 of the UDP requires that 30-50% of units are affordable (as defined in the UDP) of which 70% should be socially rented and 30% should be intermediate for key worker units. 50% of the socially rented units should normally be at least 3 bed in size to meet identified housing need unless it is demonstrated that the size of such units are not appropriate in design terms on this site. The council does not consider that other forms of housing e.g. student housing should be provided at the expense of the priority groups as set out above (i.e. social rented and affordable shared ownership/key worker). This is justified by the housing needs of the Borough in general. Any residential elements should also be exemplar in terms of its energy requirements and overall sustainability.

The council will expect that any development be accompanied by long term management and maintenance strategy that encompasses management and maintenance of all buildings and their associated amenity space. Affordable units will be transferred to a RSL (Housing Association) nominated by the council and should meet Housing Corporation Scheme Development Standards (SDS).

### 2.2 DENSITY

The residential density of any development could be up to 700 habitable rooms per hectare as the site is within Wembley Town Centre which has good public transport links. Good design is essential to making higher densities work in a scheme, therefore high quality design is essential for any increase in the intensity of development on the site. Regardless of potential density the building should not exceed the building envelopes set out at 2.3 & 2.4.

## 2.3 OPTIONS A-C – Layout, Scale & Massing

*The following policy applies to options A – C, the partial redevelopment options.*

*The continued operation of the store as a single unit is the council's primary objective. Any scheme that prejudices this objective through excessive structural works to the retail floorspace would not be acceptable. Any development of the upper floors must be on the basis that it does not compromise the effective use of the retail area. Any development is likely to be of a lightweight, pre-fabricate and modular construction to fulfil these requirements.*

### 2.3.1 LAYOUT & SITING

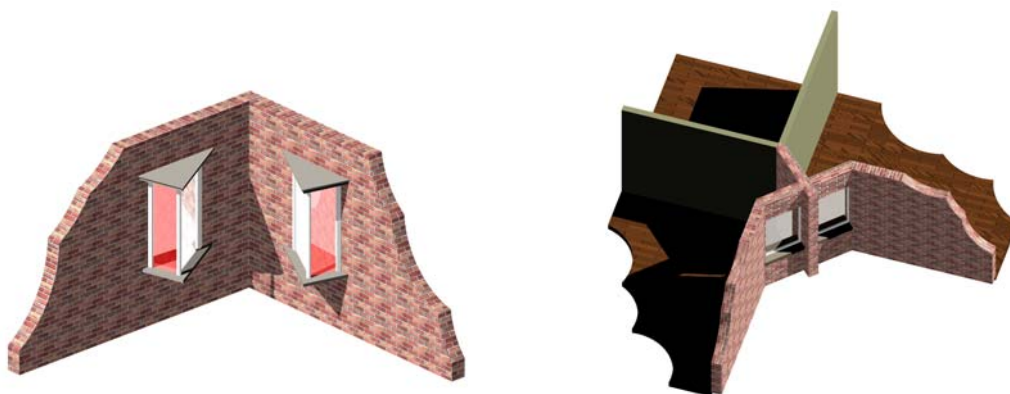
#### Orientation

Active edges, such as windows and doors overlooking the street and public areas, should be created to support natural surveillance and improve perceptions of safety. Retail and commercial uses should have their principle outlook onto the High Road and follow the existing building lines. Any development should also retain and enhance the public highway on Elm Road. Additional storeys added to the existing building should be orientated and set out in such a way so as not to prevent the future development of the adjacent Job Centre site at a higher density.

#### Residential Units

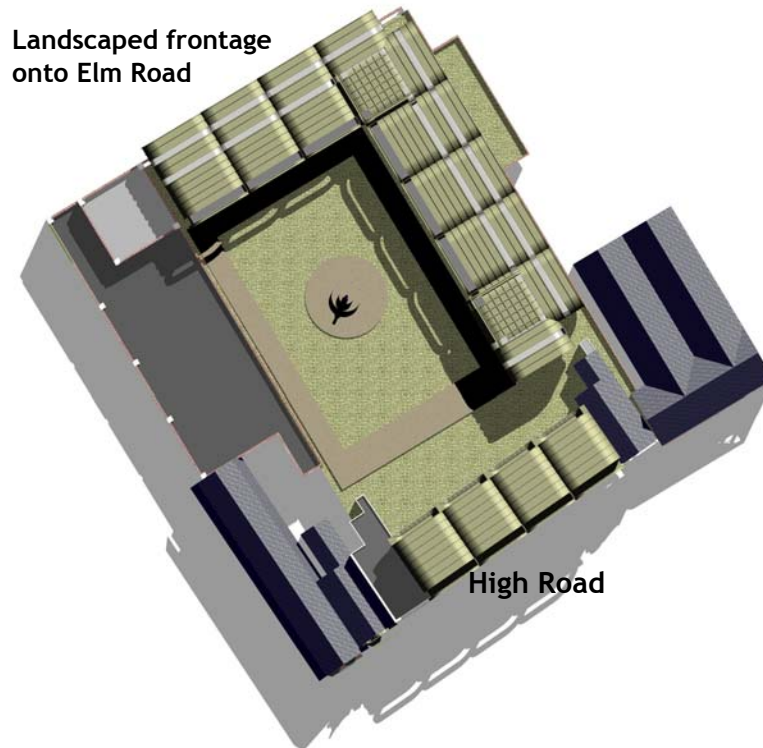
Any new residential units should be in full compliance with the standards set out in SPG17 in terms of internal dimensions and the required distances between habitable rooms will be sought to ensure the level of amenity for existing and future residents. It is particularly important that adequate distances (min. 20 metres) should be maintained between windows at the rear of the High Road properties and any habitable room windows of new dwellings built on the M&S roof space. Particular attention should be paid to maintaining individual unit privacy and outlook at internal corners within the courtyard.

Figure 4: Illustrations of mitigation measures for siting of windows



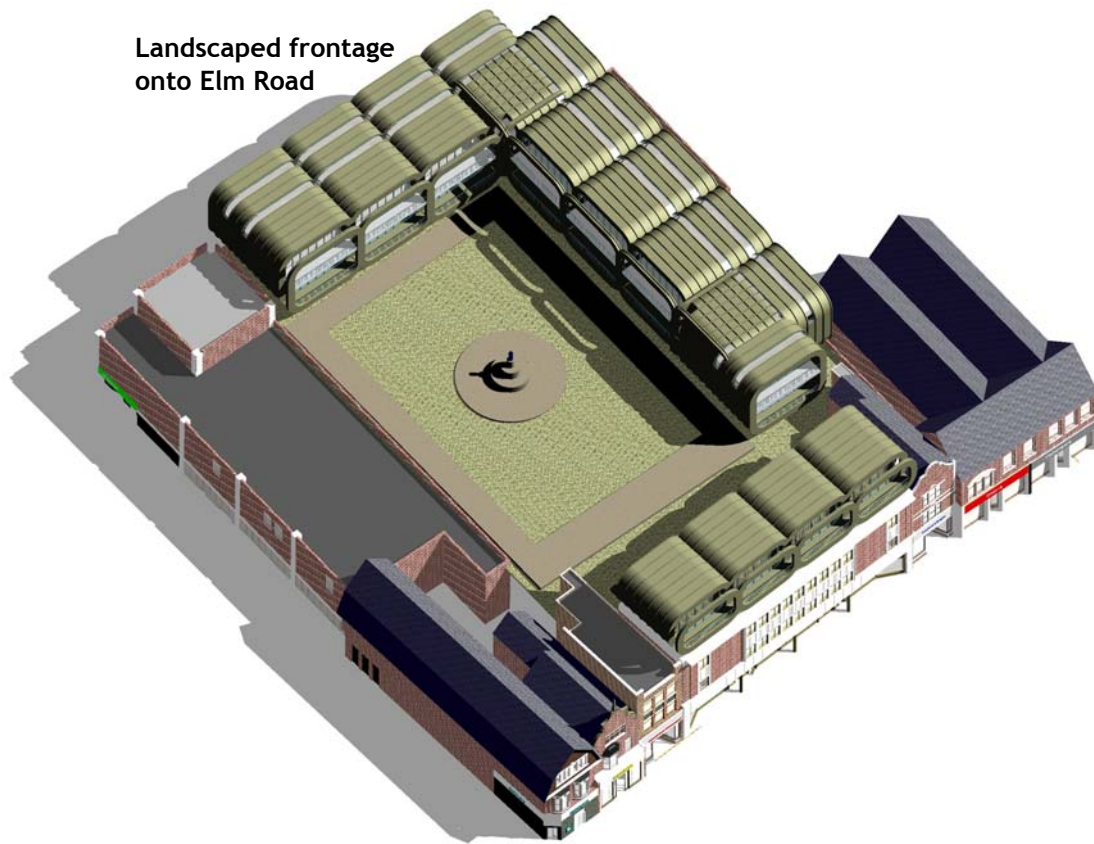
This may be resolved through the appropriate positioning of habitable and non-habitable rooms.

Figure 5: OPTIONS A & C - Indicative layout of development on M&S site only



Ideally the majority of the residential units should be located to the rear of the site, facing the properties on Elm Road to provide a transition between the existing residential area and the higher density mixed use development. Single aspect units should be avoided where possible and units should be designed to make the most of natural sunlight and daylight. A courtyard layout is encouraged which should function as a high quality amenity space.

Figure 6: OPTION A - Indicative design of development on the roof of M&S site only

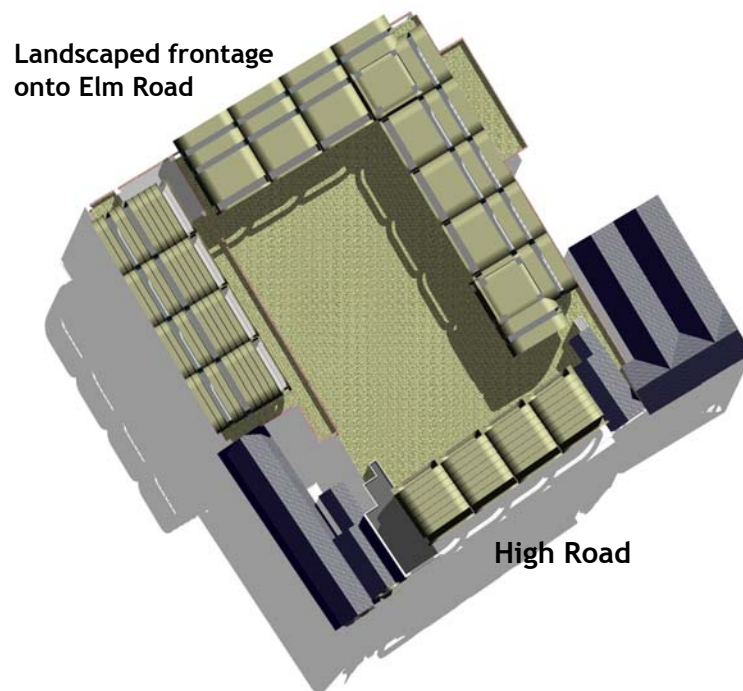


The council will not accept the development of all of the M&S roof space without the creation of suitable amenity space in the form of balconies, roof terraces and other amenity areas that meet SPG17 standards. The council will also expect some amenity space to be provided that acts as a buffer space and does not prejudice the development of the remainder of the job centre roof area.

Figure 7: Options A&C - Indicative perspective from Wembley High Road



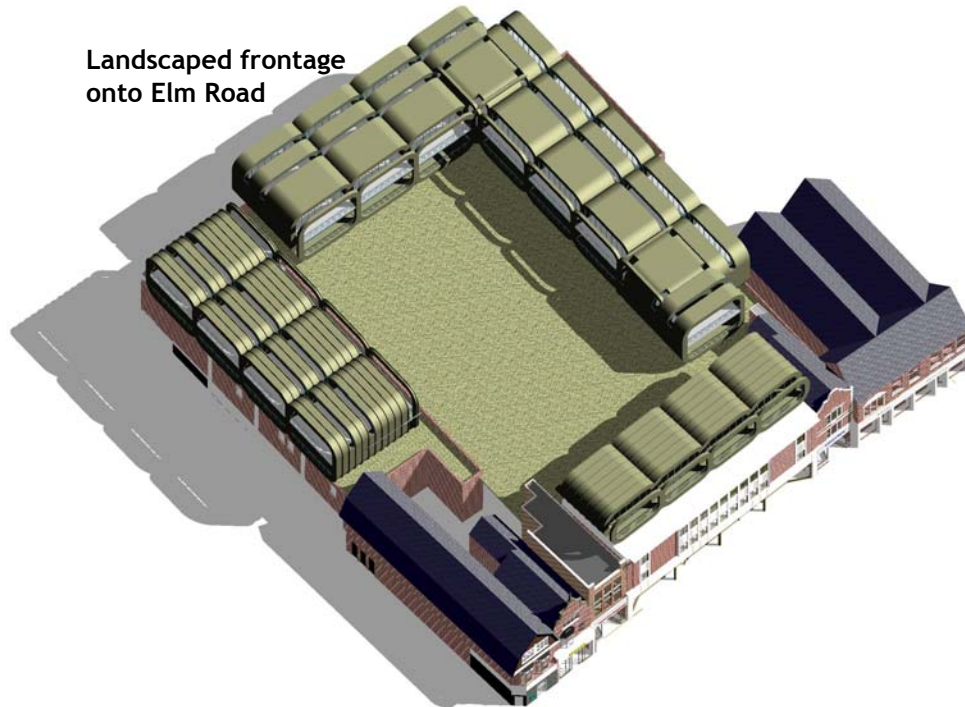
Figure 8: OPTION B – Indicative Layout of development over roof space of Job Centre & M&S



The development of residential units on other parts of the site should take into consideration potential conflicts with traffic noise on Wembley High Road, and from the service yard to the rear of the site. Appropriate mitigation measures should be taken, including the appropriate siting of windows and noise insulation.

The service area should be covered over or have no overlooking windows to avoid disturbance from vehicle movements.

Figure 9: OPTION B – Indicative design of development over roof space of Job Centre & M&S



In addition the council will expect the design of any residential element to include:

- All units should meet Lifetime Homes Standards;
- 10% should be wheelchair accessible; and
- Units should be built to Eco Homes very good standard or equivalent.

Figure 10: OPTION B – Indicative perspective of development over roof space of Job Centre & M&S



Other uses

Other uses on the site should be designed to be robust and flexible to accommodate changes in demand with adequate ancillary areas. Access, circulation, light, noise, visual impact and amenity of the site and surroundings must all be considered as part of any proposals.

For options A-C the council will not accept any encroachment on the existing building line.

Figure 11: Illustration of courtyard perspective



### 2.3.2 SCALE & MASSING

#### Townscape

The existing scale and massing of Wembley Town Centre demonstrates its origins as a primarily suburban retail centre, with 2 and 3 storey development in predominance. In the 1960s a number of larger scale 'office' buildings were built that range in scale from 4 – 8 storeys. The existing overall townscape quality is poor but there are a number of higher quality individual buildings near to the M&S building.

Design should ensure that whilst at ground level development respects the street building line, above ground buildings and terraces should be modulated with minor set backs, features (balconies etc) or forms of detailing where balconies are not appropriate – to increase interest and retain a 'finer grain' character to street frontage.

#### Scale & Massing

The combined effect of the arrangement, volume and shape of a building(s) must relate to and not dominate the relationship with surrounding buildings and spaces. A 'stepped' massing approach is considered an appropriate response to accommodate larger development on this site.

#### Height

The buildings immediately adjacent to the site on the High Road are 3 storeys in height and are of traditional style with continental influenced features and roof detailing. The addition of storeys above the existing building is considered acceptable if they are set back from the current building line and use materials that compliment the existing M&S building.

Heights should range between 3 and 5 storeys depending upon the location and relationship to adjacent existing buildings. A height range has been established to preserve the suburban town centre character and to allow a reasonable transition between the High Road and residential streets to the rear of the site.

## 2.4 OPTION D – Layout, Scale & Massing

*The following policy applies to Option D, the comprehensive development option.*

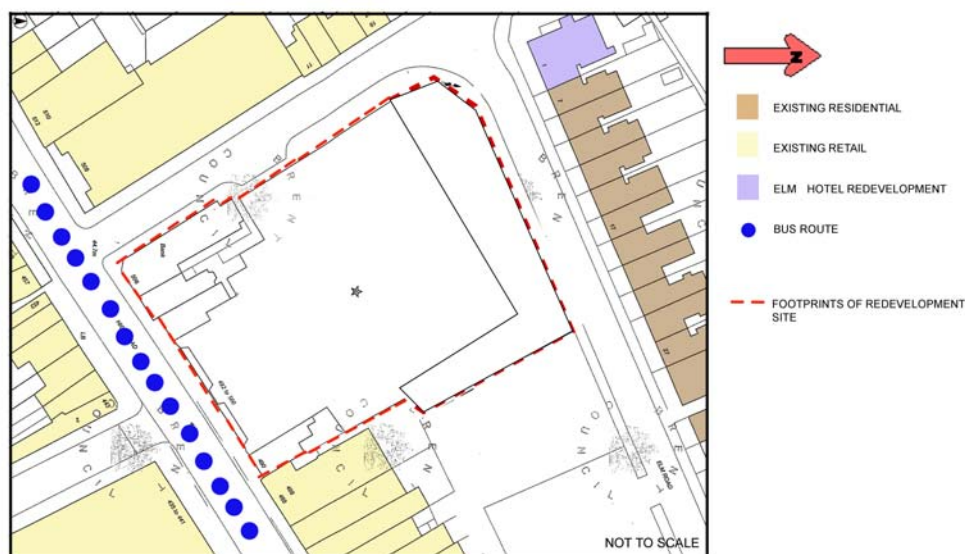
Comprehensive redevelopment of the whole corner site would only be allowed if it considerably enhanced the appearance of the town centre and provided significantly better retail opportunities. Benefits of redevelopment could include:

- Increased storey heights than envisaged on options A-C;
- Larger retail units;
- Increased residential density; and
- A more comprehensive parking and servicing approach such as basement parking (subject to a Transport Impact Assessment).

Redevelopment could take a number of different forms i.e. different building forms and different layouts.



Figure 7: OPTION D – Comprehensive Redevelopment Footprint



The proposed closure of St John's Road offers the opportunity to alter access and servicing to the site which the council would approach with flexibility. The council is also willing to consider the development of the strip of land to the rear of the site on Elm Road as part of a comprehensive scheme.

#### Height

Redevelopment of the whole site offers the opportunity to create a higher quality townscape through greater building height and design. Therefore the opportunity for more than 5 storeys may exist through exceptional high quality contemporary design.

#### Frontage architecture

The council do not wish to be prescriptive in terms of architecture however will expect high quality materials, design and detailing to merit a new focus for the High Road. Design and quality needs to be improved in Wembley Town Centre. The predominant design style in the town centre should be contemporary/modern in character.

Comprehensive redevelopment of the area should demonstrate the following qualities:

- A design that is sensitive to its setting and responsive to context;
- Of demonstrably high quality design and materials;
- Complementary composition in terms of colour, texture, scale and detail; and
- Appropriate architectural expression of the buildings.

Comprehensive development of the site will be expected to comply with the general standards set out for Options A - C above.

## 2.5 ENVIRONMENTAL QUALITY

The following elements will be required in any development on the site:

- Landscaping and public realm improvements integral to the scheme.
- Sustainable design principles should be included (Policy BE12) including the use of renewables where appropriate (i.e. solar panels); and
- Reduction of energy consumption by 10%.

The existing landscaping to the rear of the property has recently been upgraded, and there is a public convenience located on the site. This area should be retained and could benefit from further environmental improvements.

## 2.6 PARKING & ACCESSIBILITY

The site is located within an area of very good public transport accessibility given its proximity to Wembley Central Station and Wembley Stadium station. The site is also very well served by a high volume and frequency of bus service along the High Road. It is not considered that the existing road network requires any alterations in terms of capacity enhancements.

The overall provision of car parking for any acceptable uses must not exceed the maximum standards set out in the UDP. This is a suitable site for a car free housing scheme, with much reduced levels of car parking and the provision of a City Car Club, although disabled parking provision should still be included. Any car sharing scheme could be provided in conjunction with other local developments.

An access statement will be required and potential developers are advised to contact the council's Building Control Consultancy Services at an early stage to discuss potential issues.

## 2.7 PLANNING REQUIREMENTS

Any planning application shall be accompanied by the following information:

- an assessment of the proposal in light of the contents of this brief;
- an Urban Design Strategy;
- Transport Impact Assessment;
- a completed LBB Sustainability Checklist Form;
- a Daylight and sunlight assessment (where appropriate);
- Air Quality Assessment (the site lies within an Air Quality Management Area); and
- an Access statement.

The council will undertake a screening opinion under the provisions of regulation 5 of S.I 1999 No 293 Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 to assess whether an EIA is required. The council would therefore seek further information from applicants to be able to undertake this screening opinion.

## 2.8 S106 LEGAL AGREEMENTS

An appropriate legal agreement covering the provision of such items as:

- School places (according to the formula contained in Policy CF6 of the UDP)
- On/off site highway works

- Contributions towards non-car modes of access
- Environmental improvements to Town Centre
- Affordable housing
- Open space contribution
- Public Art provision
- Rights of way

### 3.0 POLICY CHECKLIST

The area is subject to the following Brent Unitary Development Plan 2004 policies:

#### **Built Environment**

BE1 Urban Design Statement  
BE2 Townscape: Local Context & Character  
BE3 Urban Structure: Space & Movement  
BE4 Access for Disabled People  
BE5 Urban Clarity & Safety  
BE6 Public Realm: Landscape Design  
BE7 Public Realm: Streetscape  
BE9 Architectural quality  
BE11 Intensive & Mixed-use Developments  
BE12 Environmental Design Principles  
BE13: Areas of Low Townscape or Public Realm Quality  
BE15: Transport Corridors and Gateways

#### **Environmental Protection**

EP2 Noise and Vibration

#### **Housing**

H2: Requirement for Affordable Housing  
H3: Proportion of Affordable Housing Sought  
H4: A Key Worker Housing  
H9: Dwelling Mix  
H12: Residential Quality – Layout Considerations  
H13: Residential Density

#### **Transport**

TRN1 Transport Assessment  
TRN2 Public Transport Integration  
TRN3 Environmental Impact of Traffic  
TRN4 Measures to make Transport Impact Acceptable  
Appendix TRN2 Parking and Servicing Standards  
TRN10: Walkable Environments

#### **Employment**

EMP15 Location of B1 Business Development

#### **Town Centres and Shopping**

SH1: Network of Town Centres  
SH2: Major Town Centres  
SH3: Major town centres and district centres  
SH6: Non-Retail uses appropriate to Primary Shopping Frontages  
SH7: Change of Use from Retail to Non-Retail

SH10: Food and Drink (A3) Uses  
SH19: Rear Servicing  
SH20: New Development in or adjoining town centres  
SH21: Shopfront Design  
SH22: Extension to Shops  
SH25: Customer Facilities in Major Schemes

**Tourism, Entertainment & the Arts**

TEA4 Public Art

**Community Facilities**

CF5 Community Facilities in Large Scale Developments  
CF6 School Places

**Wembley**

WEM1: Regeneration of Wembley  
WEM4: Residential development within the Wembley  
Regeneration Area  
WEM16: Urban Design Quality – Wembley Regeneration Area  
WEM17: The Public Realm – Wembley Regeneration Area

**The following guidance notes should also be taken into account:**

PPG3 Housing  
PPG6 Town Centres and Retail Development  
PPG13 Transport  
SPG17 Design Guide for New Development (LBB)  
SPG 19 Sustainable Design, Construction and Pollution Control  
sets out guidance for sustainable development (LBB)  
SPG21 Affordable Housing (LBB)  
Supplementary Guidance on Inclusive Design (GLA)

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