



Executive – Wembley Area Plan appendices

Monday 11 March 2013 at 7.00 pm

Committee Rooms 1, 2 and 3, Brent Town Hall, Forty Lane, Wembley, HA9 9HD

Membership:

Lead Member Councillors:

Portfolio

Butt (Chair)	Leader/Lead Member for Corporate Strategy & Policy Co-ordination
R Moher (Vice-Chair)	Deputy Leader/Lead Member for Finance and Corporate Resources
Arnold	Lead Member for Children and Families
Beswick	Lead Member for Crime and Public Safety
Crane	Lead Member for Regeneration and Major Projects
Hirani	Lead Member for Adults and Health
Jones	Lead Member for Customers and Citizens
Long	Lead Member for Housing
J Moher	Lead Member for Highways and Transportation
Powney	Lead Member for Environment and Neighbourhoods

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The press and public are welcome to attend this meeting

Agenda - Wembley Area Plan appendices

Introductions, if appropriate.

Apologies for absence and clarification of alternate members.

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This report provides a summary of the consultation responses and explains the main changes that are being proposed to the draft Plan and recommends that this be published on 25th March and made available for comment for 6 weeks. It is also recommended that it be submitted for examination subject to Full Council agreement.

Ward Affected:

Barnhill;
Preston;
Stonebridge;
Tokyngton;
Wembley
Central

Lead Member: Councillor Crane

Contact Officer: Chris Walker, Director of
Planning

Tel: 020 8937 5246 Chris.Walker@brent.gov.uk

Date of the next meeting: Monday 22 April 2013



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- The meeting room is accessible by lift and seats will be provided for members of the public.
- Toilets are available on the second floor.
- Catering facilities can be found on the first floor near The Paul Daisley Hall.
- A public telephone is located in the foyer on the ground floor, opposite the Porters' Lodge

Wembley Area Action Plan: Preferred Options (August 2012)

Responses to representations February 2013

NB Where 'Brent' is included under Representer this indicates that the proposed change is not in response to a representation but is being made to update or provide clarification.

Chapters 1-3

Representer	Policy	Comment	Response
Ace Cafe	1.4	Summary: I note that the document makes no reference to Ace Cafe London and no clear reference to the Stonebridge area. This is an area identified at Item 1.4 of the Wembley AAP vide "As far as the North Circular Road, which is also the main gateway to the area by road" - this being location of Ace Cafe London - further stating "Although this is a tightly defined area, its future is extremely important to the borough as a whole" etc. I submit that Ace Cafe London, and environs thereto, should be shown in the Wembley AAP.	The reference to the North Circular Road relates to the section that runs through the AAP area, at the eastern end of the industrial estate. The function of the AAP is to build on Core Strategy policy CP7 to provide detailed policy and guidance for the Wembley Growth Area. While Ace Café is recognised as a notable building and destination in the borough, its location in Stonebridge falls well outside the area covered by the Wembley Area Action Plan. It is therefore not considered appropriate to include Ace Café in the AAP.
Natural England	Introduction	Natural England welcomes the references to new open spaces as part of a sustainable development approach and recommends the Council to encourage and commend developers to adopt this approach. Biodiversity and the natural environment can lead to various opportunities, not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality of life. This should be made explicit in the Plan and policies included to ensure the borough's green infrastructure is designed to deliver multiple functions.	Accepted that the benefits of biodiversity and the natural environment should be made more explicit. Add to 11.1: There is a lack of open space in Wembley and access to existing open spaces is limited. <u>Biodiversity and the natural environment can lead to opportunities, not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality of life.</u> The strategic policies set out in the London Plan support the protection of local open space...
TfL	1.1	When applicable, TfL will support the borough in	Support noted.

		both negotiating and securing planning obligations particularly on those applications that are referable to the Mayor. TfL may also be a signatory to the agreement if they have a land or infrastructure protection or other key major infrastructure interest in the development site.	
QARA	2.8	"Fundamental conformity"? – does this mean that there are some areas of details in which there is not conformity – please clarify.	This refers to the legislative requirement that London boroughs' planning policies must be in general conformity with the London Plan. This is tested through consultation with the Greater London Authority and Examination in Public.
Dr Anoop Shah	3.1	This paragraph mentions "sustainable" and "well connected", but currently a major problem with this area is that there are very few pleasant and convenient cycle routes, so people travel short distances by car which causes pollution, congestion and parking problems. Roads which are safe and convenient for walking and cycling will encourage people to use active transport and will have health and financial benefits.	The paragraph refers to the vision and objectives for the future of Wembley. It is acknowledged that connections can be improved and made more sustainable, particularly in relation to cycle routes.
Dr Anoop Shah	3.2	The vitality and viability of Wembley's town centres can also be enhanced by improving local access by bicycle and walking. Reducing the amount of motor traffic will make them more pleasant and will encourage more people to visit. Housing needs - all new housing should have secure cycle parking - at least one space per bedroom. Lack of parking particularly in large blocks of flats is a deterrent to bicycle ownership and the use of bicycles for transport.	Improvements to pedestrian and cycle routes into Wembley town centres and modal shift away from private motor vehicles is examined in Chapter 6 of the AAP. Cycle parking for new development is already a requirement through planning policies and should not be repeated here.
Quintain	Vision & Objectives	In the reiteration of the Vision for Wembley on page 13 and within the Housing Needs objective on page	It is accepted that in relation to affordable housing, as with other requirements of development proposals,

		124 there is reference to the target of 50% of all new housing to be affordable. Notwithstanding that this is a target, we consider that it is important to have regard to the reality of viability (as has been recently demonstrated through the appraisal of the NW Lands Development) and the implications of the Community Infrastructure Levy (CIL) which we consider will have an impact on the deliverability of the level of affordable housing within the Borough.	viability needs to be taken into account. This principle is established within the London Plan and by paragraph 5.92 of the Core Strategy. A reference to the viability of schemes will be included in a new overview section of the WAAP: <u>Priorities for Investment</u> <u>Priorities for infrastructure investment in the Wembley Growth Area include open space, play facilities, accessibility and cycling routes, wildlife enhancements, health, schools and community facilities. These are set out in the council's Infrastructure and Investment Framework (IIF). This document is subject to regular review.</u> <u>The AAP also sets out priorities for developer contributions, appropriate to the scale of the proposed development. Essential requirements include flood mitigation, transport improvements and affordable housing. Developers will also be encouraged to provide low-cost business start-ups, public realm improvements, public art, and connection to a decentralised energy system.</u> <u>Delivery of these investment priorities is dependent on resources and viability. Infrastructure will be delivered through the Community Infrastructure Levy and the IIF includes opportunities for funding sources to complement developer contributions. The council will work closely with delivery partners such as developers, Greater London Authority and Transport for London.</u>
GLA	Vision &	Agree with approach adopted	Support welcomed

Wembley Stadium (FA Group)	Objectives Vision & Objectives	We welcome the placing of Wembley Stadium at the centre of the AAP vision and objectives, as the future business health of Wembley Stadium is an essential foundation for the area's regeneration aspirations. The development of new housing and jobs with the associated infrastructure must be managed in a way that helps promote increasing activity at Wembley Stadium and not in a manner that will restrict it.	Support welcomed
Wembley Stadium (FA Group)	Vision & Objectives	The vision also sets out objectives to promote improved access to Wembley to reduce the need to travel by car. This is to be achieved by creating a well-connected accessible location where sustainable modes of travel are prioritised with the objective that the mode share for car trips to Wembley is reduced from the current level of 37% towards the more sustainable level of 25%. We strongly welcome this policy initiative and the reduced parking standards that you will need to adopt within the AAP to achieve this. With such ambitious development aspirations in the AAP for providing at least 11,500 new homes between 2010 and 2026, plus three new hotels, a 25% up lift in retail floor space and 10,000 additional full-time jobs created by 2031, the shift to greater use of sustainable modes will be essential if the area is not to suffer from constant traffic congestion and delay.	Support welcomed
Brent Campaign Against Climate Change	Vision & Objectives	To preserve open spaces for recreation and biodiversity and create new and enhanced open spaces to address deficiencies where possible, but particularly to meet the needs of additional	Support welcomed. See also responses below.

		population commensurate with current levels of provision. AGREED • To increase the amount of public open space (at least 2.4ha within Wembley) and the amount of land with enhanced ecological value. AGREED • To enhance green and blue infrastructure by tree planting, returning rivers to their more natural courses and mitigating the pollution effects of development. AGREED • To achieve sustainable development, mitigate & adapt to climate change. AGREED • To reduce energy demand from current building regulation standards and achieve exemplar low carbon schemes and combined heat and power plants. RESERVATIONS SEE BELOW • To create a well-connected and accessible location where sustainable modes of travel are prioritised and modal share of car trips to Wembley is reduced from 37% towards 25%. AGREED AS A START BUT NEED TIMELINES FOR MORE AMBITIOUS TARGET • To promote access by public transport, bicycle or on foot and reduce car parking standards because of Wembley's relative accessibility AGREED	
English Heritage	Vision & Objectives	We acknowledge that the area defined by the AAP does not contain a vast amount of designated heritage assets. However the area and its surroundings do contain a range of assets, of which some are of historic interest or add to the areas local character. In this context we are disappointed that the "Vision and Objectives for Wembley" (pages 12-13) do not make any reference to the need to conserve and enhance the areas historic and local character. This omission is contrary to the NPPF and	Disagree. The Wembley AAP seeks transformational change for most of the area outside the SIL. Other than the individual buildings of historic interest mentioned in Chapter 4, it would not be in line with Core Strategy policy CP7 or the WAAP's vision for redevelopment and regeneration to preserve the local character as it is.

		the need for local planning authorities to set out a positive strategy for the conservation and enjoyment of the historic environment (para 126). It is also important to ensure that as part of plan making, local authorities should seek opportunities to achieve each of the economic, social and environment dimensions of sustainable development, and ensure net gains across all three (para 152). This includes setting out, in the context of the AAP, strategic priorities for the conservation and enhancement of the historic environment (para 156). The AAP does not address these aspects of the NPPF adequately.	
Natural England	3.2	Paragraph 3.2 sets out objectives for the area, which includes "protecting and enhancing the environment". This is welcomed and supported by Natural England, see our comments above also. The Council should look at the potential to alleviate fragmentation of open spaces and the linking of them back to paths and other sites, through green infrastructure, where possible and appropriate The promotion of biodiversity and the inclusion of Green Infrastructure as part of development are to be encouraged, complying with paragraph 118 of the National Planning Policy Framework. This approach will also help increase as well as enhance the provision of biodiversity and ecology potential for the area and would be in line with our comments.	Support welcomed. The inclusion of green infrastructure as part of development is a requirement of policy WEM34 and the promotion of biodiversity is included in WEM41 and WEM42. Additionally, the Plan includes a proposal for a new pedestrian bridge link across the Metropolitan / Jubilee lines linking Chalkhill open space with the River Brent park.
QARA	3.1	Is 15 yrs. Time = to 2027? – if so then state this clearly.	This is a reference to the National Planning Policy Framework (NPPF) requirements that Local Plans be drawn up over an appropriate time scale, preferably a

			15-year time horizon, take account of longer term requirements, and be kept up to date. This means the AAP contains a plan for growth in Wembley for the next 15 (or so) years, not that the policies will cease to form part of the development plan in 15 years' time. While the council feels there should not be a 'completion' date for the AAP, we can include a reference to the adoption of the document when the policies will become part of the development plan: Change to 1.1: The Wembley Area Action Plan (AAP) <u>sets out the strategy for growth and regeneration in Wembley for the next 15 years, once adopted. It is an important part of the development plan for the Borough....</u>
QARA	3.2	"Regeneration etc" – add "To give protection and security and low key maintenance to Wembley's natural open green spaces".	Disagree. This is too detailed for high level objectives. There are already policies in place to protect green spaces (eg CP18 of the Core Strategy).
QARA	3.2	(Modern, service Etc) – Add "Increase the supply of modern subsidised workplace developments for Engineering and Technology".	Disagree. This is too detailed for high level objectives. WAAP policy WEM11 deals with low-cost business start ups.
QARA	3.2	(Promoting Wembley etc) – include "new public engineering and technology displays and designs" – the traditional "expensive" public funded "public art" is often only appealing to "town planners, local officials who appear on an "Art" bandwagon" and a minority of the public.	Disagree. This is too detailed for high level objectives. Public art is supported through WAAP policy WEM4.
QARA	3.2	(People's needs) – Add "including green open	Disagree.

		space".	This is included under objective 'Protecting and enhancing the environment'.
QARA	3.2	(Housing Needs) – I query the 50% (approx) fig.!	The 50% affordable housing target has already been examined and adopted as Core Strategy Policy CP2.
QARA	3.2	(promoting improved access, etc) – Add "park and ride schemes"; Add in " sustainable means of travel = cars with improved fuel consumption plus electric cars and motor cycles / scooters" .	This is too detailed for high level objectives. Funding for a park and ride scheme is not available. The plan must be deliverable and this would be an unachievable ambition. London Plan policy 6.13 requires 1 in 5 car parking spaces to provide an electrical charging point to encourage the uptake of electric vehicles. It is not necessary to repeat this policy in the AAP.
QARA	3.2	(Protecting and Enhancing etc) – Add bullet point "Provision of "vertical" allotments commensurate with current levels of provision to meet the needs of additional population".	This is too detailed for high level objectives. Allotments are dealt with in section 11.11.

Chapter 4: Urban Design and Place Making

Representor	Policy	Comment	Response
English Heritage	Strategic Policy section	It would be useful in the Strategic Policy section of the AAP to make reference to CP17 Protecting and enhancing the Suburban character of Brent, in order to help set the context for the AAP.	Agreed. Add additional paragraph at end of Strategic Policy section: <u>Given that Wembley is an area where suburban residential development interfaces with a much more urban character of development it is important to consider Policy CP17 which states that the suburban character of Brent will be protected from inappropriate development.</u> Support welcomed.
GLA	4.4	Agree with approach adopted	Structural amendment – move section to new strategic chapter and re-name <u>History of the Area</u>
Brent	4.5-4.9		Agreed. Replace picture 4.7 with map indicating location
QARA	4.13	Add – indicate on the map location of the 2	

		Conservation Areas (i.e. Barn Hill and Wembley High Street)	of heritage assets.
Brent	4.15-4.19		Structural amendment – move section to strategic chapter
Quintain	4.16	There is an error in paragraph 4.16 where there is the suggestion that the main focus of our regeneration will remain the land to the 'east' of the Stadium. We believe you meant to put 'west' but additionally, we would point out that whilst the focus of development to date has been to the west of the Stadium we do still have the intention of developing the land to the east of the Stadium within the Stage 1 Development Area as permitted.	Agreed. Change to para 4.16: In 2011 permission was granted for a second stage of mixed-use redevelopment to provide up to 160,000m ² of floorspace in the area north of Engineers Way, from Olympic Way to Empire Way. It is likely now that the main focus for the Quintain regeneration will remain to the east of the Stadium and Olympic Way. The focus of development to date has been to the west of the Stadium. <u>Into the medium-term, development is more likely to take place in the north west of the area.</u>
Wembley Stadium (FA Group)	4.19	We welcome this vision for urban design and place making for the area around Wembley Stadium.	Support welcomed.
QARA	4.21	Add words to the effect – “denser housing provision and amenity will be “dog free” .	It is beyond the remit of the development plan to specify the ownership of pets within new development.
GLA	WEM1	Agree with option	Support welcomed.
English Heritage	WEM1	We welcome the section on Buildings of Historic or Architectural Merit, which then, in part, feeds into the section Character & Urban Form. In general we are also encouraged by policy WEM1 in that it provides a broad policy context relating to the character of Wembley. However WEM1 should be developed further so that it makes an explicit reference to the historic environment that helps characterise the area and its surroundings, and the need to conserve and enhance the areas heritage assets and their settings. In addition we would urge you to develop this policy further so that it also captures the local and historic character of the area	Support welcomed. Suggested changes to paras 4.10-4.13, 4.20-4.22 and WEM1 to improve clarity and strengthen role of historic buildings in developing future local identity for the area. <u>Local Character</u> Buildings of Historic or Architectural Merit 4.12 Historic buildings and areas provide a depth of character to the urban experience that cannot be underestimated. They <u>provide continuity</u> and connection with an area's past provides the building blocks for which

		as a whole, and sets out a robust framework for its future management that reinforces positive distinctive aspects of sub-character areas. This approach would reflect the NPPF (e.g. para's 58 and 126). To help achieve this aim, the details of the character areas could help highlight key specific policy issues within the context of WEM1. With regards to the supporting text, the subdivision of the AAP area into sub character areas is welcomed. However we would urge you to make reference to the any heritage assets that maybe present in the relevant sub area. For example the positive contribution of the character and history of the grade II Empire Pool (Wembley Arena) should be highlighted in the text relating to the Stadium Comprehensive Development Area (page 21). This approach would then help link the importance of conserving the areas heritage assets as part of the Council's approach to regeneration. This level of detail should be developed further in the Site Proposals. For example the significance of the Empire Pool, as a heritage asset, should be summarised and used to inform the details of Site W8 (page98). This approach should be applied to all heritage assets where they could be directly or indirectly impacted by Site Proposals.	helps establish the developing local identity and establishing a unique character in of an area. 4.10 The Plan area does not have a significant amount of historic buildings or buildings that are considered to be of an exemplary architectural quality. There are contains five <u>four</u> buildings <u>within the area</u> that are considered to have significant historic or architectural merit (shown on Map X): • Church of St John – Grade II <u>Originally</u> constructed in 1846 this flint building with stone dressings was designed in the <u>Early English style (Grade II)</u>. The front boundary wall and lynch gate of St John's Church has a separate <u>(Grade II) listing</u>. It is a brick structure, contemporary with the church, with decorative cast-iron boundary railings on a dwarf wall with a picturesque wooden lych-gate to the main road. <u>Any new development within the vicinity of this building should consider how the use of materials and architectural detailing responds to the historic character of the building.</u> • <u>St Andrew's Presbyterian Church, Ealing Road – A former Presbyterian church built in 1904, in a style strongly influenced by the Arts and Crafts manner. Currently in use as a Mosque (Grade II). New development must not detract from the key role that this building plays within the streetscape.</u> • <u>The Empire Pool (Wembley Arena) - Designed by Sir E Owen Williams and built in 1934, it has a</u>
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			<u>reinforced concrete frame which was the largest concrete span in the world at that time. The original pool was 200 feet long and 60 feet wide and was used for the 1948 Olympic Games. The building has recently been refurbished and is currently predominantly utilised as an entertainment venue (Grade II). The building has an important role due to its historic associations, its location at the heart of the regeneration area, and its associated public space (Arena Square). Development in close proximity to the Arena must be designed to respect the scale, proportions and materiality of the building.</u> • <u>Brent Town Hall - Built in 1935-40 as Wembley Town Hall to designs by Clifford Strange. It is a brick-clad steel frame building expressed in T-shaped plan set around central entrance hall with a Scandinavian style 3-storey front (Grade II). Given the role that this building has historically played within the borough along with its highly visible location and attractive landscape setting, any new development, extensions or alterations must seek to preserve or enhance the existing building.</u> • <u>Wembley National Stadium – Designed by Foster & Partners, the building was completed in 2007. Although not Statutorily Listed the building is nationally and internationally recognised for its iconic arch. Due to the defining role that the stadium plays across the AAP area, the council</u>
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		<u>will seek to preserve its imposing presence through the sensitive scaling of surrounding buildings in line with the approved Quintain Stage 1 development and the 2009 Wembley Masterplan SPG.</u> 4.13 There are two Conservation Areas on the fringes of the plan area (shown on Map X): • Barn Hill Conservation Area • Wembley High Street Conservation Area 4.14 As well as development within close proximity to these Conservation Areas, consideration should also be given to the impact on views into and out of these areas. 4.11 Although there are only four important buildings in the area, it is the significance of these buildings at a local, regional and national level, and their role in the townscape, that has a real impact on the character and future development of Wembley. <u>Although there are few listed buildings in the area, there are a number of locations where a building or a collection of buildings are considered to add to the richness of the urban fabric, for example along Wembley High Road. Any redevelopment proposals will need to fully justify the removal or replacement of such buildings.</u> Local Character Areas 4.22 The Wembley AAP area has been divided into 5 localities that have broadly distinctive characteristics
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	of building typology, movement infrastructure and urban grain. This provides the basis for understanding the existing character of each area and how to develop <u>this will form the basis for a</u> distinctive identity into the future. The following section will <u>outlines the</u> broad principles that should <u>to</u> guide development in each locality and provide an indication of the range of building typologies that the council views as acceptable. [Insert local character area sections – paras 4.23-4.43] Character & Urban Form 4.20 Across the AAP area there are a variety of different urban conditions that have evolved as a number of distinctive localities. Although in close physical proximity, currently the areas are functionally disconnected from one another and, other than the Stadium, there is nothing which defines Wembley as a whole. <u>Policies elsewhere in this Plan, such as Gateways, Public Realm and transport will help address this.</u> 4.21 The vast amount of development already undertaken or given permission in Wembley is of a <u>similar large scale and typology (larger blocks of predominantly 1 & 2 bed flats).</u> The area near the Stadium is being transformed into a high density urban destination, with taller buildings and a mix of uses. Other areas, such as the Strategic Industrial Location, <u>will not experience such significant change</u>		
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	during the Plan period. <u>Wembley town centre will provide both continuity, by maintaining its role and function as a Major Centre, and contribute to a new local character, for example along the new pedestrian and cycle priority route. If Wembley is to genuinely become an attractive and sustainable mixed use district of London it is vital that it can offer residents and visitors a range of facilities, attractions and accommodation in a variety of urban settings.</u> WEM 1 Character and Urban Form <u>Local Character</u> Development within <u>each</u> Wembley character area should seek to reinforce and emphasise <u>have regard to the broad development principles set out above for distinctive character of each locality through well considered building and public realm design</u> Development should seek and exploit opportunities <u>to</u> whilst strengthen ing the connections between each of the areas The council will <u>require planning applications for development affecting buildings of historic or architectural merit to demonstrate how proposals will conserve their significance and setting.</u> Para 4.29 to be amended to read: Currently the townscape character of the Comprehensive Development Area offers little in the way of consistency. There are a range of building typologies that have no real relationship to one another and the area currently lacks the appropriate quality for the setting of an international
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			icon such as Wembley Stadium. <u>The grade II listed Empire Pool (Wembley Arena) is one of the most significant historic buildings in Wembley.</u> Given the scale of planned regeneration it is more appropriate to analyse this area based on the development that has already been permitted. Proposed additional sentence at end of text for Site W8 Land West of Wembley Stadium: <u>The grade II listed Empire Pool (Wembley Arena) is one of the most significant historic buildings in Wembley. Any new development within close proximity of this building must provide a full and adequate assessment of potential impacts as part of a planning application.</u>
Brent	4.27	Amendment for clarity	Given that public transport accessibility is high, the council will support a relatively dense form of residential development, particularly in close proximity to the stations. However, given the existing suburban character around and the significant amount of flats already permitted in the area, the council would look favourably on low-rise high density options including houses <u>on sites adjacent to existing suburban areas.</u>
Brent	4.28	Amendment for clarity	The council may support development of the Chiltern Cutting sites, but only where the majority of the development is focussed to the south of the railway lines and significant measures are taken to preserve the ecological value of the area.

				There are two supplementary planning documents (SPD) to guide development in the <u>Wembley High Road area: Wembley Link SPD (2011) and Wembley West End (South) SPD (2006).</u>
Brent	New para after 4.31	Additional sentence for clarity		<u>Much of the area is designated as a Strategic Cultural Area where leisure, tourism and cultural uses are particularly encouraged.</u> Support welcomed
Wembley Stadium (FA Group)	4.32	We welcome this policy proposal and the objective of retaining the processional route and proportions along Olympic Way.		
GLA	4.33	Agree with approach adopted		Support welcomed
GLA	4.36	Agree with approach adopted		Support welcomed
Quintain	4.37	We are supportive of the ambition set out in paragraph 4.37, which states in relation to the land to the east of First Way district that 'the aspiration for this area is to introduce a wider variety of uses in order to provide a careful transition from the broader mixed use offer to the west'.		Support welcomed Suggested change to 4.37: The aspiration for this area is to introduce a wider variety of uses in order to provide a careful transition from the broader offer of mixed used development in the west, through to the Strategic Industrial Locations in the east. <u>Much of the area is designated as a Strategic Cultural Area where leisure, tourism and cultural uses are particularly encouraged.</u>
GLA	4.40	Agree with approach adopted		Support welcomed
Dr Anoop Shah	4.47	The map should separately show key cycle routes and key routes for motor traffic. In general motor traffic should be facilitated in moving between Brent and the main roads, but not for making short journeys within residential or shopping areas of Brent, in order to keep high streets and residential		A new map showing key cycle routes will be included in chapter 6.

Dr Anoop Shah	4.50	areas relatively traffic-free and pleasant. Key cycle and pedestrian routes should run through Brent connecting town centres, stations, schools etc. Wembley already has many bus routes and roads which facilitate car travel. However the proportion of journeys made by bicycle is tiny, despite the fact that many people living in Brent and the surrounding areas want to be able to ride around safely on their bicycles. People will vary their choice of mode of transport based on what is most convenient, pleasant and cheap. Currently people come by car because it is more convenient than other modes, but if cycling were made more pleasant and convenient some of these people would choose to cycle instead. It would be inappropriate to encourage car use simply because many people arrive in Wembley by car at the moment.	Proposed changes to paras 4.48-4.51 and WEM2 to strengthen policy area, in line with NPPF 154, incorporate aims of Masterplan and align with other sections of the AAP, in particular transport and public realm: <u>A Legible Wembley Gateways</u> <u>Gateways increase legibility in an area by providing a recognisable point of entry. Wembley attracts many first-time visitors and it is important to create a comprehensible area for those arriving by public transport, foot, bicycle and road. The principle gateways into Wembley are shown on Map 4.1; these are Wembley Central Station, Wembley Stadium station, Wembley Park Station and the entry to the industrial estate from the North Circular Road. The junction at Engineers Way and Olympic Way is also an important node in terms of legibility. Architecture and public realm design should reinforce the role of these gateways and nodes as important elements of the urban experience. New development should contribute to a sense of arrival and legibility of the area.</u> <u>Three Stations</u> <u>4.44 In order to create distinctive, safe and attractive</u>
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	arrival points into Wembley, Brent Council has pursued a 'Three Stations Strategy' that has seen the transformation of Wembley's three stations to ensure visitors are able to arrive and depart quickly and comfortably, whilst minimising potential negative impacts on local residents and businesses. 4.45 Improvements include: • A major refurbishment and extension of Wembley Park Station completed in 2006, increasing its capacity to 37,000 passengers per hour on stadium event days. • The iconic White Horse Bridge and a new public square at Wembley Stadium Station, completed in 2006, designed to link the stadium and its surrounding regeneration area with the existing town centre. • Modernisation of Wembley Central Station as part of a large mixed use development that has seen the creation of a new public square and lively heart to the town centre (improvements ongoing). 4.46 The work undertaken to date on the three stations has made a genuine difference to the perceptions of the area. Although there have been significant improvements to the three stations, there still needs to be more work undertaken at these arrival points, particularly Wembley Stadium Station. <u>The council will continue to prioritise and improve these gateways through policies such as WEM17 (Walking and Cycling) and WEM3 (Public Realm).</u>	
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		<u>Arrival by foot/bicycle</u> <u>The strategy for walking and cycling in the area is set out at WEM17. Gateways can help improve the pedestrian and cyclist experience of the area by providing a landmark and focal point, an aid to navigation and orientation, safe cycle parking, and areas for meeting and resting.</u> <u>4.49 The key focal points for pedestrians are the three stations and the node at the junction of Olympic Way and Engineers Way. Once the Wembley Boulevard (shown on Map 13.1 and key diagram) is complete, a pedestrian-priority spine will run through the heart of the area - from Wembley Park Station (via Olympic Way) to Wembley Stadium Station (via Wembley Park Boulevard) and on into the town centre and Wembley Central station. The junction of Olympic Way and Engineers Way has been highlighted as a Principal Gateway node due to its central location and potential role in linking together the currently disparate areas of Wembley. This will of course only be realised <u>be reinforced</u> if an appropriate alternative to the Pedway <u>pedestrian ramp</u> is delivered (see para 6.35).</u> <u>While cyclists mostly access the area by road, there will be greater permeability into the area along this pedestrian and cycle priority route. Some of the key gateways will be appropriate for cycle hubs (see</u>
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		<u>WEM17) and as nodes for connections to the wider strategic cycle network.</u> <u>Arrival by Road</u> <u>4.50 However, a significant amount number of people (on both event days and non-event days) arrive in the area by bus, car or other modes of road transport and the experience of coming to Wembley should equally cater for these people. The Plan's approach is one which balances the need to discourage car use by prioritising walking, cycling and public transport whilst ensuring that the area is accessible to traffic such as event-related coaches, waste collection and delivery vehicles, emergency services and disabled drivers (see 6.8).</u> <u>4.47 As well as improving the public transport infrastructure, a two-way tidal carriageway linking Wembley Stadium with the North Circular Road has been created along most of the route and, although the improvements have significantly eased traffic flows on event days, there is still no real sense of arrival when entering Wembley from the east.</u> <u>4.48 Given the scale of planned regeneration, the desire to create a sustainable mixed-use community and the relative ease of access to the wider London region, the council will continue to focus on the three stations as hubs of activity and foci for development in the area.</u> <u>4.51 Although some significant improvements have been made, access into Wembley by road,</u>
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		particularly from the North Circular Road (A406) lacks any real sense of identity or arrival. Given that the eastern area will remain focused on employment uses, the principal means for improving legibility and public perception of the area will be to improve the public realm and way finding throughout the industrial estate. <u>Opportunities for new development to enhance main routes into and through the area should be exploited.</u> The quality of development along key routes and the potential to enhance important junctions will be given significant weight when considering applications in these locations. <u>WEM 2</u> Gateways to Wembley The council will continue to focus on the three stations as the principle gateways into Wembley. The enhancement of nodes around key junctions will be sought, particularly to the east of the AAP area. Architecture and public realm design should seek to reinforce the role of these gateways and nodes as important elements of the urban experience. <u>Any new development around the Triangle junction (High Road/Wembley Hill Road) must demonstrate how the strengthening of connections through the area has been considered.</u> <u>Development at principal gateways and key nodes will be expected to add to the sense of arrival and legibility of Wembley.</u> <u>The quality of development along key routes will be</u>
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				<u>given significant weight when considering applications in these locations.</u>
Dr Anoop Shah	4.51		Access by road should be improved for people cycling into Wembley, and junction improvements should incorporate international best practice solutions with segregation of cyclists, pedestrians and motorists at major junctions.	See proposed changes above and to Section 6 (Transport) where enhanced cycling facilities are addressed
GLA	WEM2		Agree with option	Support welcomed.
Dr Anoop Shah	4.54		Shared space and home zones are appropriate only on roads with no through motor traffic, where the only motor traffic is access to and from properties. It is essential that through motor traffic is prohibited and speed limits are very low (e.g. 10mph) for such areas to be safe.	Proposed changes to paras 4.52-4.55 and WEM3 to strengthen policy area, in line with NPPF 154, incorporate aims of Masterplan and align with other sections of the AAP, in particular transport and Gateways: <u>The public realm strategy for Wembley centres on the legibility of the pedestrian and cycle priority route which runs between the three station gateways, and connectivity between different character areas. To ensure a high quality public realm, the council will apply London Plan public realm policies when considering applications for new development.</u> <u>Public realm improvements are essential to improving the urban environment. The Wembley Masterplan identifies a number of public realm aims which development proposals should incorporate into the design, where practicable. These are:</u> • <u>De-cluttering and rationalisation of street furniture</u> • <u>Widening of footways</u>

	• <u>Legible signage</u> • <u>Placing street lighting on buildings, subject to preserving residential amenity</u> • <u>Removal of unnecessary barriers to pedestrian and cycle movement</u> • <u>Tree planting in the vicinity of new development, where possible.</u> • <u>Integrating existing natural assets into the new streetscape, where possible</u> • <u>Public toilets and services should be fully integrated into design of public realm</u> • <u>Public realm should include places for people to linger, rest and socialise</u>	
	<u>The legibility of the pedestrian and cycle priority route from Wembley Park station along Olympic Way and the Boulevard to Wembley Stadium station, across White Horse Bridge and the Triangle junction, and down Wembley High Road to Wembley Central station will be delivered substantially through a consistent approach to the public realm design, including hard and soft landscaping, signage and street furniture.</u>	
	4.52 It is envisaged that the design philosophy for the public realm could reflect local character and the land uses of a specific AAP area, rather than an area-wide corporate signature. Street paraphernalia furniture should be kept to a minimum and, where	

	possible, grouped and/or rationalised to minimise its cumulative impact on the public realm. 4.53 Wembley requires a safe, connected and inclusive public realm which reduces the need for physical barriers for pedestrians and cyclists (see WEM17). The relationship between pedestrian and vehicular circulation will have to be carefully designed to enable pedestrian predominance and movement. Shared space similar to Home Zones can be used to improve the public realm and environment for pedestrians. Shared space will only be appropriate in areas that have low levels of traffic, such as the new residential district (Site W18). It will not be supported in through-routes. High quality public realm around key gateways and nodes will be particularly important in creating better connections between the different character areas of the Plan area. Shared surfaces and dual use surfaces similar to Home Zones will be encouraged, particularly in residential locations. 4.54 The council will seek to reduce the need for physical barriers and let the quality and character of spaces control circulation, speed and direction. Safety through consideration, rather than regulation, will be the guiding principle. Vehicular speeds could be significantly reduced through passive measures rather than relying upon barriers, high kerbs and excessive signage. Consideration will be given to the
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	removal of existing barriers to pedestrian movement wherever possible. 4.55 The Core Strategy sets a target of planting 1,000 trees in the Wembley Growth Area and <u>these will mainly be delivered through developer contributions.</u> Street trees and other planting offer an opportunity to create a local character by the careful selection of complementary species relative to their setting and location. <u>Choosing the right tree for the right place is vital as urban streets are hostile places and trees are susceptible to damage from weather, vehicles and vandalism.</u> <u>Trees require as much soil rooting volume as possible which creates various problems when competing with underground services. Where possible, new development should exploit opportunities to run utility services in common channelling, leaving adequate space for tree planting.</u> <u>Species selection should be made in consultation with the council's Landscape Team. The council will encourage support the use of more mature specimens where appropriate to accelerate the greening of existing hard urban environments.</u> WEM 3 Public Realm Public realm improvements will be sought that reflect local character as an integral element of proposals for new development.
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			The council will seek a consistent approach to the <u>public realm along the pedestrian and cycle priority route between the three station gateways</u> <u>New development will be expected to contribute to connectivity in the area through public realm improvements at key nodes and junctions</u> <u>The council will require development to contribute to new tree planting</u>
GLA	WEM3	Agree with option	Support welcomed.
Natural England	WEM3	Policy WEM 3 refers to Public Realm and the Council and developers should look at the potential for green infrastructure to contribute towards the public realm, soft landscaping as well as hard landscaping.	Noted
GLA	WEM4	Agree with option	Support welcomed.
QARA	WEM4	Delete "Public Art" replace with words reflecting comments in point 5 above i.e. replace with an Engineering / Technological display / design. ADD "any public display will have a public "consensus" approval before commissioning".	When commissioning public artworks it is extremely difficult to establish a community consensus. Any proposals will follow the necessary statutory consultation procedures.
Brent	4.56-4.59 WEM4	Proposed changes to paras 4.56-4.59 and WEM4 to strengthen policy area, in line with NPPF 154, and incorporate aims of Masterplan	4.56 The council recognises the role that public art can play in the creation of attractive and distinctive places and spaces. Public art engenders legibility in the landscape and promotes local identity, instilling civic pride and encouraging inclusive environments. As well as being a hub of sporting and architectural excellence, Wembley has the capacity to accommodate some significant permanent artworks as part of a coordinated approach to public realm and open space design.

	4.57 Public art should connect both local people and visitors to Wembley as a destination and a “place”; it could recognise and celebrate the diversity of Brent’s population; it could enliven buildings, spaces and places; it should stimulate, surprise, delight and amuse; and, it should enrich the lives of those who live, work and visit Wembley. <u>The council will seek contributions towards a range of permanent art works across the area. This could take the form of a single large piece, or alternatively number of linked, smaller scale interventions into the public realm.</u> Public art is not only considered to be permanent installations or artworks, but also music, dance, festivals and one-off occurrences. The design of public spaces should always consider how infrastructure such as stages, stalls and access to power and water for events could be provided where appropriate. This will influence the choice of materials as they will need to be robust enough to deal with heavy loads. 4.58 Where proposals emerge around Principal Gateways or Key Nodes (Policy WEM2) consideration should be given to the incorporation of public art as a means of enhancing legibility and a local sense of identity. <u>Provision must be made for the setting of public art as part of the design process – areas considered suitable for installations should be identified early, to enable supporting infrastructure to be provided. The opportunity and potential for buildings and landscapes to be pieces of art in</u>
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			<u>themselves should not be missed.</u> 4.59 There are a number of existing open spaces in the AAP area and the Wembley Masterplan SPG 2009 proposes a series of new public open spaces. Where development proposes the creation of new open spaces, provision should be made for the setting of public art as part of the design process. WEM 4 Public Art <u>Where appropriate, the design of public spaces should allow for event infrastructure.</u> The council will seek contributions towards public art from development within the AAP area, particularly at key gateways or where new open spaces are proposed. <u>The design of new open space should include a place for public art.</u>
English Heritage	WEM5	It is noted that Map 4.2 sets out a Strategy for Tall Buildings. It highlights areas where tall buildings will be inappropriate, sensitive to, and appropriate. This Map is supported by the text and on page 30, where reference is made to a Tall Buildings in Wembley study. Unfortunately we did not receive a copy of this study or we unable to access it on the Council's web page. Therefore our comments are based upon the evidence detailed in the AAP. In the absence of this information a point which we would wish to seek clarification relates to how the settings of heritage assets were assessed. For example the	Tall buildings will be acceptable in a limited number of locations within the AAP area. In areas designated as 'appropriate' tall building proposals should demonstrate that they will not cause harm to the significance of heritage assets, as well as their impact on key views of the Stadium. Any application for a tall building within Wembley will be required to submit a three dimensional digital model in a format specified by the council. Where necessary, the submission of heritage statements will be required. Additional paragraph after 4.62:

		grade II Empire Pool (Wembley Arena) is identified as falling within an area sensitive to tall buildings. To its immediate north, east and south the area is shaded as being appropriate for tall buildings. It is not clear whether the setting of the Empire Pool and how its surroundings contribute to its significance has been appropriately considered. English Heritage have published guidance on how to assess the setting of heritage assets (The Setting of Heritage Assets 2011 - http://www.english-heritage.org.uk/publications/setting-heritageassets/). This guidance should be used as part of the sieve approach of assessing where tall buildings may or may not be appropriate. With this in mind we would suggest that Policy WEM5 should expand its requirement for information, in which to demonstrate the impact of proposals. For example tall building proposals should demonstrate that they will not cause harm to the significance of heritage assets (this includes their settings), as well as key views of the stadium. In addition we support the policies emphasis upon the applicant to submit 3 dimensional modelling with their proposals. We would suggest that applicants should also submit heritage statements in support of their modelling. This would help address key aspects of the NPPF, such as para's 128 and 192.	In line with WEM1, the council requires planning applications for tall buildings affecting listed buildings and buildings of architectural merit to demonstrate how proposals will conserve their significance and setting.
Environment Agency	WEM5	Map 4.2 (page 31) indicates that the majority of areas adjacent to the Wealdstone Brook and the River Brent are marked as inappropriate for tall buildings. We support this because tall buildings in close proximity to a watercourse can have a detrimental impact on the ecology by shading of	Development appropriate to sites adjacent to the Wealdstone Brook is set out in the Site Proposals. This includes set-backs from the river.

		the watercourse and encroachment onto the river corridor. Our advice is that tall buildings are set-back to minimise this impact. If this is not possible any impacts from shading or encroachment would have to be mitigated for either on the site or elsewhere. The policy would help ensure that tall building proposals are not located near to watercourses. However, it would be useful if the guidance text (paragraphs 4.60 – 4.62) acknowledged the potential detrimental impact of tall buildings on the nature conservation of an area if located close to a watercourse and this should be avoided wherever possible.	
GLA	WEM5 Tall Buildings	Agree, but should emphasise highest architectural quality and require submission of key views framework to accompany applications.	Change Policy WEM5 to: Tall buildings will be acceptable in a limited number of locations within the AAP area, <u>where they can demonstrate the highest architectural quality.</u> <u>Where tall buildings are proposed in areas designated as 'appropriate' and 'sensitive' the council will require the submission of a key views assessment to accompany planning applications proposals must also fully demonstrate their impact on key views of the Stadium.</u> Any application for a tall building within Wembley will be required to submit a three dimensional digital model in a format specified by the council.
Quintain	WEM5 Tall Buildings	Tall buildings are described as being over 10 storeys or 30 metres. Within Map 4.2, Wembley Retail Park	The inclusion of the Wembley Retail Park as an area sensitive to tall buildings does not preclude the inclusion

		is described as being sensitive to tall buildings. However, the adopted Masterplan clearly identifies locations within this area that are considered suitable for buildings over 10 storeys. We consider that provided the other principles of good planning and urban design are observed then the location of tall buildings on the land currently known as Wembley Retail Park should be considered on its merits.	of tall buildings. Para 4.62 makes this clear in the fourth bullet which states “areas designated as ‘sensitive’ may have some scope for a tall building, but due to adjacent properties, site assembly or location of site (orientation etc) will require further work to establish an appropriate form of development.” The Site Proposal for Wembley Retail Park (W18) states explicitly that “the Wembley Masterplan sets out general 4-6 storey heights with taller elements (8-12 storeys) on identified corner plots on key junctions.”
Westminster City Council	WEM5	The AAP identifies a number of sites considered suitable for tall buildings within the action plan area (tall buildings are defined in the AAP as those over 30m tall). These opportunity sites are principally adjacent to the stadium / Olympic Way. We note that many suitable sites for tall buildings have already been developed, or have been consented and are pending development. We also note that three locations for particularly tall buildings of 45-75m have previously been identified in the Wembley masterplan (2009). The Mayor’s London View Management Framework identifies 17 views that originate in or cross Westminster; none of these would be impacted by tall buildings at Wembley. Westminster has identified 45 Metropolitan Views in our draft Metropolitan Views SPD. None of these would be impacted by tall buildings at Wembley. We are not aware of any locally significant views (identified in our conservation area appraisals) which would be likely to be compromised by tall buildings at Wembley. The only views of Wembley Stadium Arch from	Noted

GLA Quintain		Westminster are private views from tall buildings. While these views do undoubtedly hold some value, it is not considered proportionate to ask Brent to take them into consideration in drafting the Area Action Plan or for development management purposes.	
	WEM6 WEM6	Agree with approach adopted WEM6 sets out the list of views of the Stadium that are proposed to be protected. As these are a change from policies BE34, WEM18 and WEM19, we consider that further information should be provided on the changes. We may also wish to make comments on such further information as it emerges.	Support Noted A comprehensive review of the views set out within the UDP was undertaken as part of the Strategy for Tall Buildings. This has formed the evidence base for the policy WEM6. Given the fact that the previous views were based on the original Wembley Stadium and that a considerable amount of development has been undertaken since the UDP policy was introduced, it was considered appropriate to remove a number of views that were no longer deemed relevant. It was also deemed appropriate to add additional views where they support the general aspirations of the Area Action Plan. The reasoning behind the removal of views was generally either that they were outside of the borough and therefore out of the control of the council or otherwise the impact of new development had removed the need to protect a view. Views 10 & 11 (White Horse Bridge Great Central Way) are essentially slight revisions of previous views – WEM 19 Short Distance Views 1 and 4 respectively. Views Down Olympic Way (7 & 8) were included due to the importance of the processional nature of the route and that they have already been used in order to assess the impact of subsequently approved development. Views 4 & 9 (Welsh Harp and Chalkhill Park) were added due to the impact of the stadium views and its role as an important landscape feature within the boroughs public open spaces.

Westminster City Council	WEM6	Westminster support the principle of view protection, and note the importance of co-operation between neighbouring boroughs to ensure that views are effectively safeguarded. We consider that views of landmark buildings are of particular value and have proven to be an important part of local identity and place making in Westminster. In the case of Wembley, we do not consider that the development of tall buildings in Westminster would be likely to have an impact on the most of proposed protected stadium views. Tall buildings in Westminster, particularly in Paddington, may well be visible in protected view 2 (Elmwood Park), appearing in the background of the view. While much of the available development land in Paddington has already been redeveloped	Proposed change to 4.67 for clarity: Brent's UDP (2004) 4.67 Policies BE34, WEM18 and WEM19 of the UDP. The council will therefore seek to protect a range of short, middle and long distance views of the National Stadium. Although the initial assessment was based on the original stadium, the protection of such views extends to the new stadium. A fundamental element of the development of a Strategy for Tall Buildings for Wembley was the evaluation of the views set out in the UDP. The study recommended the removal, retention and addition of a number of important views that will need to be considered as part of any application for tall buildings.
			Support Noted

		or consented, sites in Paddington continue to come forward for redevelopment. Very tall buildings in this area are unlikely to be acceptable given our Core Strategy policy on tall buildings however.		
QARA	WEM6	These views are too general; need specific locations – perhaps referred to as appendices or other document. ADD “views from the top of Barn Hill open Space across and into Central London will also be protected”	Maps 4.3 and 4.4 identify specific locations where views will be protected. It is not considered to be possible to protect all views into central London without significantly constraining regeneration of Wembley.	
QARA	WEM7	ADD “use of “sunken tiered terraces” to provide hidden panoramas without affecting the view / outlook of and from the Stadium”.	Amend para 4.69 to read: The principle of creating a number of smaller pocket spaces <u>flanked with lower level building projections</u> along the route has been firmly established by the Wembley Masterplan and subsequent approval of the Quintain North West Lands development. This will create a series of unique spaces with a more intimate, human scale containing a range of soft landscaping, water and lighting, as well as dedicated spaces for performance, public art and seating that will encourage people to meet, dwell and socialise. In order to establish a rigorous and consistent design approach, any proposed development flanking Olympic Way must seek to incorporate complementary pocket spaces, or otherwise demonstrate how it successfully contributes to significantly enhancing the public realm.	
			Add new para after 4.69: <u>In line with policies WEM5 and WEM6, proposals for tall buildings must demonstrate that they have no</u>	

				adverse visual impacts on views of the stadium from Olympic Way.
GLA			Agree with approach adopted	Support Noted
Wembley Stadium (FA Group)	WEM7	WEM7	In particular, we support your proposed policy WEM 7 with regards to the character of Olympic Way where you state the Council will seek active ground floor uses either side of Olympic Way that can be appropriately managed on Event Days. We note that you have not taken forward the alternative option for UD4 that sought to "Review and Strengthen the design code for Olympic Way" where you concluded that this level of design detail was not considered to be appropriate for an Area Action Plan. We would like to emphasise however that Olympic Way and the access to it from the Stadium using both the ramps and street level form an essential part of the Stadium egress plans for normal and emergency egress and that the statutory requirements of licensing for sport and concert events must be fully considered and taken account of as part of any future urban design proposal for Olympic Way and for the adjacent development.	This is acknowledged in changes to para 6.35: The council considers that <u>supports</u> the removal of the pedway <u>pedestrian ramp</u> and its replacement with an improved access arrangement between Olympic Way and the Stadium would greatly enhance the southern part of Olympic Way and address <u>remove what is currently a poor street environment. It would be supportive of the removal of the pedestrian ramps whilst ensuring providing that access to the Stadium and emergency egress are integral to the design, remains adequate and any changes help address what is currently a poor street environment.</u>
Brent	WEM7		Addition in order to better reflect policy direction in supporting text. Deletion repeats policy elsewhere in the AAP.	Proposed Development on Olympic Way must be carefully designed and scaled to respect the predominance of Wembley Stadium and its arch. Proposals for tall buildings must demonstrate that they have no adverse visual impacts on views of the stadium from Olympic Way. The council will seek active ground floor uses either side of Olympic Way that can be appropriately

			managed on Event Days. <u>Development flanking Olympic Way will be expected to incorporate pocket spaces</u>
GLA	WEM8	Agree with approach adopted	Support Noted
Quintain	WEM8	WEM8 requires detailed specifications to be submitted with all major applications (comprising more than 10 units). This is not a requirement of the planning regulations and therefore we would ask that this policy is revised or withdrawn.	Change to supporting text and WEM8 to clarify position: <u>Securing Quality Design Materials Quality</u> <u>The Council is responsible for achieving sustainable development; this includes the protection and enhancement of the borough's built environment over the long term. Pressures on the economic viability of development can result in aspects of design coming under threat during a downturn, including quality of building materials and finishes. However, it is important that the whole life costs of a development are considered and design solutions interrogated to ensure that limited resources are targeted to their best effect.</u> <u>The appropriate choice of materials is an important element of sustainable development and can result in an improved built environment, greater energy efficiency, less pollution and a range of other social and ecological benefits. There is also a considerable amount of research that highlights the economic benefits of high quality design, such as increased market attractiveness, higher rent and capital values.</u>

	4.70 High quality design should be <u>is a fundamental</u> an <u>integral part of the vision for Wembley scheme development</u> and, as such, should be built early on into all budgetary projections. <u>This is particularly important for the more expensive elements of a scheme, such as facade materials and the amount of space and attention given to landscaping. A good building design is often a function of the materials specified for construction. All buildings, to a greater or lesser extent, are a function of their construction detail.</u> The choice of materials is second only to the way their connections and junctions are detailed. Such a choice should be a fundamental consideration of the development of a design proposal for a building.
	4.71 All too often, the quality of materials used in the final build out of development is reduced significantly for reasons of <u>cost</u> after planning permission has been granted and in many cases this has adversely affected the <u>quality of the development</u>. The 2009 Masterplan aspires to secure quality detailing at an early stage of the design process in order to avoid such 'value engineering'. Brent Council welcomes examples of the quality and type of materials proposed at the time of application. Therefore <u>detailed specifications of the primary materials suite, including facade materials, fixings and junctions between materials, should be submitted as part of a planning application for major developments (10+</u>

		<u>residential units or 1000m2). and it should not be assumed that the choice can be made at a later date.</u> <u>It is recognised that developers may need to seek approval for alternative high quality materials after planning permission is granted.</u> <u>4.72 The council encourages the provision of information on the quality of details as part of planning submissions, to illustrate and promote the overall design theme. Securing detailed specifications as part of the planning consent would give all parties the confidence that the quality of the final buildings would remain high.</u> <u>Design guidance in the form of supplementary planning documents has been prepared for a number of locations across the Plan area. Where applicable, design proposals should have regard to the Wembley Masterplan, Wembley Link, Wembley West End (South) and Brent Town Hall SPDs.</u> WEM 8 Securing Design Quality The Council will <u>require</u> <u>expect details the submission of the primary materials suite detailed specifications to be submitted as part of all major applications within the AAP area.</u>
QARA	WEM8	Define "major" here or elsewhere Agreed.

			Addition to para 4.71: ...Therefore detailed specifications of the primary materials suite, including <u>façade materials, fixings and junctions between materials, should be submitted as part of a planning application for major developments (10+ residential units or 1000m2)....</u>
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Chapter 5: Business, Industry and Waste

Representor	Policy	Comment	Response
Brent Campaign Against Climate Change	Ch.5	We propose the creation of a Green Enterprise zone in the area with a concerted effort by Brent Council, in conjunction with the College of North West London, to bring green training, apprenticeship and jobs into the area. At present aside from the building jobs associated with regeneration there is an over dependence on the creation of jobs in retail and leisure. Green jobs would make a significant contribution to the upskilling of the Brent labour force.	Brent may be prepared to support. More detail on 'green enterprise zone' and 'green jobs' needed.
Quintain	5.1	We welcome the reference to policy CP20 within paragraph 5.1 but would ask, for the avoidance of doubt, that the wording replicates that of CP20 and refers specifically to the various uses, including sui generic uses that are closely related to industrial employment uses appropriate within Strategic Industrial Land. We would ask that this clarification is set out in W29 – Second Way, also.	Agree: Suggested change to 5.1: "...London Plan policy is reflected by policy CP20 of Brent's Core Strategy which <u>promotes protects SLLs for industrial employment and closely related uses characterised by use classes B1, B2 and B8, or Sui Generic uses that are closely related.</u>" Suggested change to W29 (in light of proposed change

		from PIL to IBP): The site is considered suitable for uses in line with CP20 including offices, <u>light industrial and higher value general industrial, utility and transport functions, wholesale markets, small scale distribution and Sui Generic uses that are closely related offices, light industry, storage and distribution, some transport related functions, utilities and wholesale markets.</u> Given the proximity of potential residential uses on First Way, the site is not considered suitable for long term occupation by waste management uses, <u>including aggregate storage and transfer. The relocation of such uses to the Preferred Industrial Location (PIL) north and east of Fourth Way will be encouraged.</u> Suggested change to para 16.5 This site is in a SIL and currently designated as a Preferred Industrial Location (PIL) in the London Plan. <u>The council is proposing a change of designation to Industrial Business Park which is more in keeping with its location adjacent to a non-industrial area of regeneration. It is also designated as a business park.</u> The proposed uses are compatible with these <u>this</u> designations. Remove business park designation from Map 5.1.
Costco	5.1	Costco welcomes the recognition within paragraph 5.1 of the WAAP that policy CP20 of Brent's Core Strategy promotes SIL for industrial employment and closely related uses. Core Strategy Policy CP20 specifically refers to "closely related sui generis uses". We request that specific reference is made Agree: Suggested change to 5.1: " ...London Plan policy is reflected by policy CP20 of Brent's Core Strategy which <u>promotes protects</u> SILs for industrial employment <u>and closely related uses</u> characterised by use classes B1, B2 and B8, or Sui

		within paragraph 5.1 to closely related sui generis uses in accordance with the Core Strategy.	<u>Generic uses that are closely related."</u>
Quintain	5.2	There is reference in paragraph 5.2 to a Joint Waste Plan having been prepared with other London Boroughs. Given that the Stage 1 Development Area is the first site within the UK where the Envac vacuum waste disposal system has been installed, entirely without Government or local funding, we wish to review this report to determine how it fits with the waste strategy for the regeneration of the Comprehensive Development Area where our majority landholdings are located and which are the focus of our regeneration work.	The draft West London Waste Plan (WLWP) can be viewed here: http://www.wlwp.net/ The WLWP is yet to be submitted for examination. There will be further opportunity to comment on the Waste Plan separately when it is published prior to submission.
Quintain	Ch.5 Strategic Industrial Locations	The Policy for Strategic Industrial Locations appears to be missing from page 38 although the ' <i>Alternative Options not Selected</i> ' is included. We wish to review and comment on the proposed policy when it is made available.	The policy for Strategic Industrial Locations (SIL) is Core Strategy CP20 which is referred to in para 5.9. It is considered unnecessary to repeat this policy in the WAAP. Proposed changes to the current SIL boundary will be included in Map 5.1. Detailed changes to the Policy (Proposals) Map will be included as an appendix. These will be signposted in para 5.10.
QARA	Para 5.6	Delete "may be" ADD "is".	Accepted. The level of waste management undertaken in the industrial area has also increased and may be is reaching a level where it is impacting upon Wembley's regeneration prospects.
GLA	Map 5.1 WEM9	GLA support minor amendments to the SIL boundary at Wembley in principle but a high resolution map showing the detail of the boundaries will be required for our records.	Proposed changes to the current SIL boundary will be included in Map 5.1. Detailed changes to the Policy (Proposals) Map will be included as an appendix.
Carey Group Plc	5.1-5.9 and	In summary, we consider that the Council should re-	Partially agree.

	Map 5.1	examine the SIL boundary and release further land, including the Racal Site which is located right at its edge adjoining the Eastern Lands, in order to better facilitate economic development within the area. The Council should also seek to adopt a more flexible approach to the use of the remaining land within the SIL to maximise economic benefits and job creation.	In terms of the release of further land, this is discussed on p 38 of the AAP in the 'alternative options not selected' box. The London Plan identifies Brent for limited release of industrial land (policy 4.4 and map 4.1). It is not appropriate, therefore for de-designation of SIL to extend significantly eastwards as suggested with the Racal site. The AAP proposes de-designating 2.4 ha from the SIL which seeks to balance the protection of industrial land (London Plan 2.17 and Core Strategy CP20) with future development of the Wembley growth area. (CP7). This is supported by the evidence document: Economic Development and Employment Land in Wembley. In terms of flexibility of uses; the proposed changes to 5.1 (see above) seek to better align appropriate uses in the SIL with Core Strategy policy CP20. The council is also proposing a change to part of the SIL area currently designated as a Preferred Industrial Location (PIL). We will work with the GLA to re-designate land in the west of the SIL (identified as Wembley Eastern Lands in the AAP) to an Industrial Business Park (IBP), through the London Plan review process. This designation is still part of the SIL but offers more of a buffer between non-industrial uses proposed for the Comprehensive Development Area and the PIL. Change to para 5.9: It is proposed that the SIL area will be reduced slightly to the new boundary as shown on the extract from the
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	<u>Proposals Map above. In addition, the council will work with the GLA to re-designate part of the SIL from Preferred Industrial Location (PIL) to Industrial Business Park (IBP) (shown on Map 5.1). While PILs are suitable for uses including general industrial, storage and distribution, waste management and recycling, IBPs are suitable for activities that need better quality surroundings including research and development and light industrial. This will create a buffer zone between the non-industrial uses proposed for the Comprehensive Development Area and the SIL. The London Plan definitions of PIL and IBP, including appropriate uses, are set out in Appendix B. Planning policy towards proposals for Development within the SIL will be subject to London Plan policy 2.17 and Brent's Core Strategy policy CP20 together with policy WEM8 for Wembley Stadium Business Park set out below.</u>
	Add to Appendix B Glossary: Industrial Business Park (IBP) Strategic Industrial Locations that are particularly suitable for activities that need better quality surroundings including research and development, light industrial and higher value general industrial, some waste management, utility and transport functions, wholesale markets and small scale distribution. They can be accommodated next to environmentally sensitive uses. Preferred Industrial Location (PIL) Strategic Industrial Locations that are particularly suitable for general industrial, light industrial, storage and distribution, waste management, recycling, some transport related

Quintain and GLA	5.9			functions, utilities, wholesale markets and other industrial related activities.
			In paragraph 5.9 there appears to be an erroneous reference to WEM8 instead of WEM9.	Agree. Reference will be corrected.
QARA	5.10 WEM9		Paragraph 5.9 references policy WEM 8 in the document this is policy WEM 9 para 5.10 and (WEM 9) – the maps or extracts that are here referred should be specifically cross referenced to say “fig ?, page ?”.	It is proposed that the paragraph be deleted.
Carey Group Plc	5.10, Policy WEM 9 and Map 5.1		In summary, we consider that the Council should adopt a more flexible approach to uses within the Business Park and extend this area eastward to maximise the potential to improve the townscape and public realm along the Stadium Access Corridor and also the area around the River Brent.	In light of the council’s proposal to re-designate part of the SIL to an Industrial Business Park, including the area currently designated as a Business Park in the UDP, and the Strategic Cultural Area which is designated in the London Plan, it is felt that the Business Park designation is no longer necessary.
				The area covered by the current Business Park will therefore be divided into the eastern section currently in the SIL and the western section adjacent to the Stadium.
				The council will seek re-designation of the eastern section (which is Site Proposal W29) from Preferred Industrial Location (PIL) to Industrial Business Park (IBP) through the London Plan review process. The proposed changes to Site Proposal W29 incorporate the land use principles for an Industrial Business Park. This reflects the site’s location and purpose to provide a buffer zone between the non-industrial uses proposed for the Comprehensive Development Area and the PIL. (See response to Quintain on para 5.1 above)

		The western section will fall within the Strategic Cultural Area within which major leisure, tourism and cultural uses are encouraged. Mixed use development is also appropriate in this area. This is addressed in policy WEM27 and in individual Site Proposals. Changes to para 5.10 and WEM9: Wembley Stadium Business Park 5.10 Although little business (B1) development has come forward since the business park designation was established in the UDP 2004, it remains a good option for promoting regenerative development of run-down parts of the industrial estate. In this way modern premises can be provided which can boost job generation locally as well as improving the environment and townscape on the main access route to the Stadium and to Wembley City. It is now considered, however, that a more realistic designation is that shown on the Proposals Map extract below. This reduces the area to that bounded by First Way and Fourth Way, and allows for more general industrial, distribution and open storage or waste management uses to locate to the north and east. Not only are waste management uses considered incompatible with business park development but their potential impact upon regeneration can be minimised by limiting them to the estate further away from key regeneration sites. It is, therefore, appropriate to limit such uses within the area designated as business park. WEM 9
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			Wembley Stadium Business Park Redevelopment for business use of the area east of the Stadium, as shown on the Proposals Map, will be encouraged. Development attracting large numbers of trips should contribute towards transport improvements appropriate to the scale of the proposed development. Development for waste management, and related uses such as aggregate storage and transfer, will not be appropriate in this area. The relocation of such uses from within the business park area will be encouraged.
Quintain	Map 5.1	Map 5.1 on page 39 identifies Wembley Retail Park as a good location for offices but elsewhere the strategy is clearly to bring forward housing on this site around a new park. In particular, the Map appears to be contrary to statements in paragraphs 4.31 and 4.37 and the anticipated school provision on site W18. We ask that Map 5.1 is amended accordingly.	Agree. Amend map 5.1 to better reflect site proposal uses.
GLA	WEM9	Preferred option WEM9 on pg 40. This option suggests that some waste management capacity may be lost on the Wembley Stadium Business Park. LP 5.17F states Boroughs in preparing their LDF documents must allocate sufficient land for waste management to provide capacity to manage the tonnages of apportioned waste. Brent should confirm if any waste management capacity is proposed to be lost off-site, or if it is being moved to another part of the site. If for any reason an existing waste management site is lost to non-waste use, additional compensatory site provision is required in line with LP Policy 5.17H.	There are two sites of waste management activity in the business park area. One has recently ceased operation whilst the other one has a temporary consent only. Overall the land area in waste management use in the area has increased substantially in recent years with the development of the Seneca operation in Hannah Close to the east. In addition, the council proposes re-designating land in the west of the SIL (identified as Wembley Eastern Lands in the AAP) from Preferred Industrial Location (PLI) to Industrial Business Park (IBP) through the London Plan review process. This re-designation will help provide a buffer between non-industrial uses

Brent Campaign Against Climate Change	WEM9	We are in favour of strict controls on waste management and processing sites in the entire area, rather than the limited area proposed. We would also favour relocation where that is possible. The events over the summer regarding the Seneca MRF and the 'Wembley stink' should serve as a warning for the future. The Neasden/Wembley area already suffers from severe air pollution problems with school pupils particularly at risk because of the impact of air pollution on their smaller lungs. Chalkhill Primary, St Margaret Clitherow Primary,	proposed for the Comprehensive Development Area and the SIL. The proposed area for re-designation will be shown on Map 5.1 and in detail in the Appendix. In light of the above WEM9 has been deleted. Site Proposal W29 has been changed to reflect the GLA's comments. Suggested change to W29: The site is considered suitable for uses in line with CP20 including offices, <u>light industrial and higher value</u> general industrial, utility and transport functions, <u>wholesale markets, small scale distribution and sui generic uses that are closely related</u> <u>offices, light industry, storage and distribution, some transport related functions, utilities and wholesale markets</u>. Given the proximity of potential residential uses on First Way, the site is not considered suitable for long term occupation by waste management uses, <u>including aggregate storage and transfer</u>. The relocation of such uses to the Preferred Industrial Location (PIL) north and east of Fourth Way will be encouraged. While waste management is an appropriate use in SILs, the Joint West London Waste Plan does not identify any sites for the borough in addition to those currently in use. Propose additional sentence after 10.7: <u>The whole of the AAP area is an Air Quality Management Area (AQMA). Any proposals for new development will have to comply with London Plan policy 7.14: Improving Air Quality which seeks to</u>
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		Northview Primary, Oakington Manor Primary and the proposed new Wembley Stadium Primary in Fulton Road are all in the vicinity. Older people also suffer disproportionately from respiratory problems	<u>minimise increased exposure to existing poor air quality and make provision to address local problems of air quality, particularly within AQMAs.</u>
Quintain	WEM9	Wembley Stadium Business Park comprises two sites as defined within the Site Proposals sections 12-16 of the AAP Preferred Options, namely W28 First Way within Wembley Eastern Lands and W29 Second Way within Wembley Industrial Estate. WEM9 deals with Wembley Stadium Business Park and appears to promote solely business uses in this location whereas the permitted site proposals for the W28 includes for mixed uses, including residential. We believe WEM9 should be clarified in this regard with a statement confirming that the sites closest to the Stadium would support mixed uses, including residential.	Agree. A strategic map will clarify which uses, including mixed uses, are appropriate where. This will include the addition of policy areas including the Strategic Cultural Area and a proposed change to the western part of the SIL to an Industrial Business Park designation. The Business Park designation is no longer necessary and WEM9 has been deleted. Add sentence to Site Proposals W14, W15, W16, W17, W19, W26, W27, W28: <u>This site lies within the Strategic Cultural Area where leisure, tourism and cultural uses are particularly encouraged.</u>
QARA	5.12	2 years appears too long a time – suggest 1 year. (What is the basis of 2 years ?).	Two years is established policy as set out in the UDP. Short term vacancies can extend to up to a year whilst 2 years is considered to be sufficient to demonstrate a longer term problem
QARA	WEM10 Para 5.12	Definition of “alternative uses” and “medium term” needs defining	Examples of appropriate alternative uses are set out in para 5.12. Alternative uses will be considered on a site by site basis in light of planning policies both within the AAP and the development plan as a whole. It is not appropriate to repeat these here.

Quintain	WEM11	WEM11 states that low cost business space will be encouraged as part of major mixed use development. This will have an impact on viability and thus will have an impact on Section 106 obligations, after CIL. We consider that this should be stated in the document.	Medium term is generally understood to be 2-10 years, and this is reflected in the requirement to demonstrate a lack of demand for office occupation for two years. This policy is in line with CP20 which states “Redevelopment [in SILs] will be expected to: Provide new employment floor space that is fit for modern usage for a range of B use classes including business parks, ‘starter’ and ‘move on’ units for small and medium enterprises, and studios for artists and cultural and creative industries.” This is supported by Brent Employment Land Demand Study (2006). New paras in strategic chapter as follows: <u>Priorities for Investment</u> <u>Priorities for infrastructure investment in the Wembley Growth Area include open space, play facilities, accessibility and cycling routes, wildlife enhancements, health, schools and community facilities. These are set out in the council’s Infrastructure and Investment Framework (IIF). This document is subject to regular review.</u> <u>The AAP also sets out priorities for developer contributions, appropriate to the scale of the proposed development. Essential requirements include flood mitigation, transport improvements and affordable housing. Developers will also be encouraged to provide low-cost business start-ups, public realm improvements, public art, and connection to a decentralised energy system.</u> <u>Delivery of these investment priorities is dependent on</u>
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			resources and viability. Infrastructure will be delivered through the Community Infrastructure Levy and the IIF includes opportunities for funding sources to complement developer contributions. The council will work closely with delivery partners such as developers, Greater London Authority and Transport for London.
QARA	WEM11	Define "business start ups" here or elsewhere.	Agree. Change para 5.13: There are currently few sites or premises where low-cost space for new business start-ups (ie new or emerging businesses) is available. It is appropriate therefore, as an alternative to office-based employment, to encourage the provision of new low-cost space for business start-ups, subject to demand.

Chapter 6: Transport

Representor	Policy	Comment	Response
Dr Anoop Shah	6.1	How have the parking policies been "modified" - more or less car parking? How much cycle parking has been specified? It is important that large blocks of flats have enough cycle parking space.	In general, the proposed standards provide slightly less parking than the current UDP standards (see Wembley Standards Report p25 for further details). The proposed standards are in line with the London Plan in terms of cycle parking provision; within new residential developments this requires 1 cycle parking space per 1 to 2 bedroom dwelling, and 2 cycle parking spaces per 3+ bedroom dwelling. In addition, 1 cycle parking space per 40 units is required for visitors.
Brent Cyclists	6.1	Brent Cyclists welcomes the aim of encouraging a move to sustainable transport modes and reducing the need to travel by private car. We would caution against application of very low car parking	Brent has a policy of responding positively to requests from our stakeholders including cycling groups, the public and others, for improved cycling infrastructure.

		standards, in fact, since these do not actually prevent people acquiring more cars than there is room for, and storing them inconsiderately and obstructively on streets. This phenomenon has been witnessed before in recent new developments in Brent (e.g. Princes Square in Queensbury), where low parking standards have been applied, on an assumption of low car ownership, and public space has just become clogged with cars, including parking on pavements, because alternatives to the car have not been made attractive enough, and there are not the resources (or political will) to prevent obstructive parking. The unintended consequence of having low parking standards then is a worse walking and cycling environment.	In respect of low parking standards leading to cars being parked where it is in appropriate, it is accepted that a policy of car restraint should be accompanied by improvements to ensure that other modes of travel more attractive.
Brent Cyclists	6.2	We support this, and need to point out that encouragement of the integration of rail and cycling is one of the best ways in which "links between the stations and strategic leisure facilities can be improved". This means not only adequate cycle parking, but high-quality cycle routes built into the redeveloped environment from the start, using international best practice for cycle infrastructure, seamlessly linked to the public transport hubs.	Support noted, our strategy for cycling is outlined later in Chapter 6.
Quintain	6.3	Paragraph 6.3, Strategic Objective 8 and the 'Transport' objective at paragraph 17.5 set out the ambition to reduce the modal share of car trips from 37% towards 24%. In order to avoid confusion, we ask that this is adjusted to replicate the adopted Core Strategy which sets the lower baseline at 25%. Notwithstanding the adjustments	Agree, change to 25%. 6.3:..... A specific aim for Wembley is to reduce modal share of car trips from 37% towards <u>24%</u> <u>25%</u> . Outcomes of travel plan monitoring will be used as the primary source to assess how well this target is met. The

		to the Core Strategy at Examination it is still not clear how the reduction in modal share is to be measured. We ask that this is clarified so that the validity of this measure can be fully considered and commented upon and, if appropriate, specific action can be taken towards the 25% goal.	traffic model for Wembley is being updated at present, and it may be feasible to use model outputs to supplement the use of travel plans for monitoring of this mode share target in future .
Brent Cyclists	6.3	# funnelling all traffic on to a small number of main road crossings, where space for cycling and walking is insufficient and unpleasant. These barriers also create motor vehicle congestion, and make use of foot and bike less practical by making journeys unnecessarily long. It is vital in the first instance, at the very least, to provide new, high-quality pedestrian and cycle crossings of the Chiltern Line, to the south of the area, and the Metropolitan Line, to the east of the area, BEFORE extensive redevelopment of the area cements-in car-centric patterns of movement because the alternatives remain too unpleasant.	The WAAP proposes a pedestrian/cycle bridge crossing over the Metropolitan line. A study into different options for bridge locations in Wembley commissioned by the council showed that the Chiltern line crossing by South Way would be of only local benefit. Improvements for cycling through Brent River Park and improved connectivity through the main development area to the west of the Stadium will help overcome barriers from the railway. We believe these routes offer sufficient north-south connectivity with Tokyngton and Stonebridge to the south, and link in with the wider Greenway routes.
Wembley Stadium (FA Group)	6.3	We note that one of the main objectives in Brent's Core Strategy is that access by public transport, bicycle and on foot should be promoted and car parking standards reduced in Growth Areas because of their relative accessibility. A specific aim for Wembley is to reduce the mode share of car trips from 37% down towards 25%. Wembley Stadium welcomes this approach as part of managing the predicted traffic impact for the wider area that will be generated from delivering growth.	Support welcomed

QARA	6.3		ADD "the use of motor cycles and scooters will also be promoted".	Disagree. Although the council has no formal view, in general motorcycles and scooters are considered private forms of motorised transport. They do not provide the benefits that result from walking, cycling and the use of public transport and as such should neither be promoted nor discouraged.
Dr Anoop Shah	6.4		All new roads and junctions should be built with Dutch-style high quality cycle facilities, because this is the only way to encourage large numbers of people to cycle. Specifically this means segregated cycle paths along busy roads, and segregation at major junctions. The Mayor has committed to improving cycle infrastructure in London and may be willing to invest in boroughs that are most enthusiastic about building Dutch-style infrastructure.	Disagree with suggestion. Refer to cycle/walking section for how these users will be considered in new and improved junctions. A study on cycling across West London is underway and will help inform the development of cycle routes in Brent which are consistent with our neighbours
Brent Cyclists	6.4		New road connections and junction improvements must have built into them the facilitation of a safe and attractive environment for cycling. Consideration should be given to the construction of contraflow cycle tracks or lanes on one-way roads. This may be better than converting such roads to two-way motor vehicle operation, from the point of view of effecting modal shift away from cars, this being a stated objective. It needs to be recognised that cycling needs to be made MORE CONVENIENT than driving, as well as objectively and subjectively safe, if a modal shift towards it is to be achieved. This document does not give the impression that this understanding is present.	Agree with principle, refer to cycle/walking section for how these users will be considered in new and improved junctions. Routes will be considered which are fit for purpose for cyclists, and opportunities sought for removing through traffic from in appropriate routes – this will improve the environment for cyclists
Wembley Stadium (FA Group)	6.4		We strongly support the need for these junction improvements to be implemented as part of	Support welcomed. The Council will continue to tailor the junction improvements to ensure that benefits for car

		helping to deliver a more consistent and reliable journey to and from the Stadium by car and coach for our customers who are allocated the use of these modes of transport as part of our overall transport plan. More than 80% of our customers use public transport for access to and from the stadium but for those who use surface transport by car and coach we have an important need to improve their journey to and from the Stadium.	users are realised, as well as benefits for non car users.
Brent Cyclists	6.5	Orbital transport links in north-west London generally are lamentable, and there is a clear need for a rail or tram-type link on a similar trajectory to the North Circular Road. But there is also a clear need for cycle routes that actually work. These have huge potential to improve orbital transport and connections between the local town centres, but they require serious engineering, not a few lines or signs on pre-existing pavements. This type of third-class cycle facility (as we have on parts of the North Circular Road pavement at the moment) has a record of failure, and should not be reproduced.	We recognise the need to improve transport links and actively engage TfL for improvements to orbital transport such as our support for the introduction of a London Overground service between Brent Cross and Hounslow on the Dudding Hill Freight line. A potential stop at Neasden would improve orbital connections from Wembley Park. Opportunities will also be taken to provide convenient crossing points for the North Circular for pedestrians and cyclists We also recognise the need for dedicated cycle infrastructure to facilitate a step change in cycling and recognise its potential to improve orbital connections.
TfL	6.6 WEM12	There is also work being undertaken by London Rail to explore options for links between Old Oak Common and Brent Cross via the Dudding Hill line in relation to the development of Old Oak Common interchange station between High Speed Rail 2 (HS2) and Crossrail. Common interchange station between High Speed Rail 2 (HS2) and Crossrail.	Agree. Refer to TfL work on Old Oak Common and Dudding Hill Rail link: [New para after 6.25] <u>There is currently work being undertaken by Transport for London Rail to explore options for links between Old Oak Common and Brent Cross via the Dudding Hill line in relation to the development of Old Oak Common interchange station between High Speed Rail 2 (HS2) and Crossrail. A station could potentially be located at Neasden providing interchange with the Jubilee line. In addition, Transport</u>

			<u>for London and Network Rail are exploring the potential from some Crossrail services to run from Old Oak Common onto the West Coast Mainline and onwards to Hertfordshire and beyond. These services would likely call at Wembley Central.</u>
TfL	6.6 6.7	Not all of the Wembley area boundaries are identified to benefit from a PTAL of 6. The AAP should include the range of PTALs which will then assist in identifying what may be required in terms of improving public transport and access, along with the required infrastructure needs. TfL notes that paragraph 6.7 is contradicting previous statements. It refers to poor accessibility as opposed to paragraph 6.6 which states that the area has high PTALs scores. The PTAL to the east of the site may be lower but this does not mean that public transport provision is poor as there are several bus routes that serve the east, 18, 92, 182, 204 and H17. There is the Jubilee and the Metropolitan lines which also operate through Wembley Park station in the east and mainline line to Marylebone from Wembley Stadium station.	Agree: reword 6.6 When the level of bus services is added, the area has a Public Transport Accessibility Level (PTAL) of up to 6 (out of 6) which means it is one of the most accessible locations in London. However, the PTAL for the Wembley Area decreases towards the east with a PTAL of 1 or 2 in the Eastern Lands and Industrial Estate. Agree, but rewording of above helps this. Disagree. Public transport provision is poor. The only bus routes to serve this area are the 92 and 206. Rail and underground stations are a considerable walk from this area. As a result PTAL to the east of the Stadium is 1b – 2, typically referred to as 'poor' or 'very poor'.
Brent Cyclists	6.6	The statement "Wembley is a generally well connected area" is true for radial rail journeys in London, but for no other form of transport. It is	Reword 6.6 to recognise poor sustainable links: 6.6 Wembley is a generally well connected area, particularly by public transport <u>and radial links to Central</u>

		massively untrue for the truly sustainable modes, walking and cycling, from the viewpoint of which Wembley is thoroughly disconnected from the rest of the Borough of Brent, let alone the rest of London. The scale of this problem needs to be appreciated. The connections just do not exist, and must be created as a top priority before moving a large number of new homes, jobs and leisure facilities into the area.	<u>London. Wembley is served by with connections from the Metropolitan and Jubilee lines at Wembley Park, the Chiltern line at Wembley Stadium station, and from London Overground and the Bakerloo line at Wembley Central, all of which provide key access gateways into Wembley for public transport users. <u>Orbital links are primarily provided by bus, of which a large number of routes pass through Wembley. However, walking and cycling links within and from Wembley to the rest of Brent are either poor or non-existent. Largely due to the rail and underground links, Wembley can be thought of as a very sustainable location for major trip generating development (80% of events crowds choose to use public transport), but to support this, better pedestrian and cycle access will be sought in line with Brent's wider transport strategy.....</u> continue with the TfL reword of 6.6.</u>
QARA	6.6	The true range of PTALs should be given not only the highest rating! (PTALs and their approximate % area with reference to the total "subject area).	Agree. Include PTAL map showing variation. Rewording to 6.6 (above)
Dr Anoop Shah	6.8	Brent is currently far too attractive to come to by car compared to cycling, so the balance needs to shift heavily in favour of walking and cycling. The only way to improve conditions for motorists is to enable people to cycle more easily and thus remove unnecessary traffic and congestion. The balance is not between different road "users" (as if they are separate people) but in creating a road environment which encourages people to choose walking and cycling for most short to medium length trips, and only to drive on the few occasions when it is necessary.	Amend 6.8: ...Studies which have just been completed address some of these issues to reduce through traffic, improve the environment for to encourage more pedestrians, cyclists and public transport users, while providing convenient access for motor vehicles served by better located car parks....
Brent Cyclists	6.8	The statement "the approach... is one which	Amend 6.8:

		balances the need to minimise car use whilst ensuring that the area is also attractive to those who wish to come by car" sounds self-contradictory. If the area is attractive to car-use, that will inevitably mean a less good environment for cycling, walking and public transport. There is a real choice to be made here, and it sounds like it will be fudged. While acknowledging that a level of motor access is essential, "improving" roads and junctions in such a way as to facilitate large volumes of through-traffic can only worsen the environment and increase traffic levels. Motor traffic in London expands to fill the space allocated to it. A more intelligent use of road space could facilitate a modal shift away from car use, but this will depend on detailed designs.	...The approach to facilitating the level of development that has been estimated as likely to come forward in Wembley, therefore, is one which balances the need to minimise discourage car use <u>by prioritising walking, cycling and public transport whilst ensuring that the area is also attractive accessible to traffic those who wish to come by car</u> such as event-related coaches, emergency services, waste and delivery vehicles, and disabled drivers.
Brent Cyclists	6.9	Depending on "enhanced bus services" is unrealistic as a method of securing modal shift away from the private car. The attraction of the private car is its convenience and independence from timetables, and door-to-door operation. Over medium distances (1?4 miles), only cycling can compete with the private car as a realistic mode providing these advantages. Cycling is not, however, perceived as a realistic alternative by most people in Brent currently because of the poor subjective quality of the experience, with too much interaction with heavy and fast traffic, and poor road designs for cycling. This area provides the rare possibility of starting with a "clean sheet" to seriously change this. It should be taken advantage of, but there is little sign of this concept being well-developed at the moment.	Agreed, make reference to the role of sustainable modes in reducing reliance on car. Amend 6.9 ...Through the provision of enhanced bus services and facilities, <u>improvements to pedestrian and cycling infrastructure, and the implementation...</u>

Brent Cyclists	6.10	We support all this, noting again that there is very limited space on these existing corridors. The need for new pedestrian and cycling only corridors, bridging the rail lines, is critical.	Support noted.
Quintain	6.11	Within paragraph 6.11 there is reference to a parking strategy and we comment further on the proposed parking standards below. We will comment further as necessary on the Parking Strategy once we have had the opportunity to review it.	Noted.
Brent Cyclists	6.11	It should be noted that small businesses usually have a very inaccurate idea of the modes of transport their customers use. It has been shown time and time again (see e.g. http://www.cycling-embassy.org.uk/sites/cycling-embassy.org.uk/files/documents/eev68.pdf) that shopkeepers always over-estimate the number of customers who come by car, and the amount they spend, and underestimate the importance to their business of those who do not come by car. Dedicating too much public space to car parking inhibits those who do not use cars from taking their custom to shops, and this does not do trade any good. The parking strategy should take this into account.	The point is accepted. The strategy is one which is seeking a modal shift away from the use of the car towards other modes. Car parking provision locally is low compared to strategic centres generally in London and will continue to be relatively low into the future.
QARA	6.11	The referenced parking strategy needs to be specifically cross referenced.	Agreed. Cross reference to be included.
Dr Anoop Shah	6.12	The key to reducing congestion is to increase walking and cycling, and this requires all road schemes to incorporate international best practice cycling and walking facilities from the outset, even if this slightly reduces motor traffic capacity.	Agreed that increased walking and cycling will assist in reducing congestion. Changes to Walking and Cycling section help emphasise best practice principles. Highway schemes will look to improve conditions for these modes especially along the Western Corridor, however

Brent Cyclists	6.12	There is no contradiction between viable town centres and low levels of traffic, in fact, there is a correlation. High levels of traffic damage the viability of town centres, as people do not wish to linger in this environment, particularly as such good on-line shopping possibilities exist now. The successful town centres of the future will be those that provide an enhanced social experience, which does mean limiting motor traffic, and free on-street car parking.	international best practice will not always be possible with current funds available for transport improvements. Points noted. It is accepted that high levels of traffic in High Streets detracts from the shopping experience.
Quintain	6.14	There is reference to a South Way study within paragraph 6.14 to discourage through-traffic to the Town Centre through the creation of a two-way circulation within the Industrial Estate as set out in WEM13. We are broadly supportive of this strategy subject to detailed review of the required land as identified in Appendix C (as amended). We would ask that it is made clear in the document where land has already been secured for these improvements, e.g. on the Kelaty House site, if appropriate.	Agreed. With reference to the Kelaty House site, land has been identified in two alternative locations to assist with delivering the transport improvement within this area. Identification of the two portions of land gives greater flexibility for implementing the transport improvement. More detail of the land take required is included in site proposal W28. 6.14 A Highways and Bridge study has been completed which recommended changes and improvements to South Way the restoration of two way working to the Eastern Lands and Industrial estate gyratory to improve accessibility as development builds out. This will improve ear-access and movement within the Masterplan area and to access stadium car parks, but in a way which does not encourage through traffic through the existing Wembley town centre. A number of short stretches of land are required to deliver these improvements, and are shown in Appendix C.

TfL	6.15	All work which is proposed towards improving highways involving any Transport for London Road Network (TLRN) or the Strategic Road Networks (SRN) will have to be consulted and approved by TfL.	Add in para after 6.15: <u>Any improvements to the Transport for London Road Network (TLRN) or the Strategic Road Network (SRN) will have to be consulted and approved by TfL.</u> Before 6.9: <u>The Wembley Area Action Plan includes a small part of the Transport for London controlled North Circular Road (A406) which is part of the Transport for London Road Network (TLRN). The North Circular provides strategic highway access from Wembley particularly to the M25 and wider TLRN. The A404 (Harrow Road – High Road) is part of the Strategic Road Network (SRN) which TfL have a strategic interest over and, hence, will be consulted upon highway alterations. The rest of the roads in the Wembley Area Action Plan area are borough controlled roads.</u>
Quintain	6.15	We consider paragraph 6.15 to be misleading as currently drafted and ask that it is redrafted as set out below. The paragraph identifies a number of junctions, which are required to be improved. As you will be aware, the majority of these junctions have been identified as part of rigorous Environmental Assessments carried out to support our own planning applications for the Stage 1 Lands and the NW Lands. These assessments considered existing and anticipated future year flows with the development traffic overlaid. Appropriate mitigation has already been secured to address the impacts of all permitted developments together with the anticipated	Accept that clarification is needed. Reword 6.15: A number of junctions have been identified as needing improvements to mitigate against the impacts of traffic generated by development to maintain highway reliability for existing users, including public transport users. <u>All</u> junction improvements will take into account the needs of pedestrians and cyclists, with these users specifically prioritised along the Western Highway Corridor, which runs from Forty Lane to Wembley High Road. The junction of Wembley Hill Road and Empire Way was <u>recently</u> converted from a gyratory to a roundabout to provide a more attractive and easily accessible public space for the <u>community</u> has recently been improved. <u>A number of</u>

		growth in background flows and these improvements are capable of being delivered within the highway boundary or on land within our control. Similarly, the improvements to the Triangle junction and the South Way / Wembley Hill Road junction have been secured through the Outline Permission on site W6 (South Way surrounding Wembley Stadium Station) in favour of the London Development Agency, now the GLA. We would ask that these existing agreements are made clear as such together with any additional improvements anticipated to be required by the Council to mitigate against the impacts of further development identified in the Site Proposals sections of the AAP. These clarifications should be made to paragraphs 6.15 and 13.6. To that end, we ask that paragraph 6.15 is redrafted to read as follows: <i>“A number of junctions have been identified as needing improvements to mitigate the impacts of traffic generated by development to maintain highway reliability for existing users, including public transport users. Junction improvements will take into account the needs of pedestrians and cyclists, particularly along the Western Highway Corridor, which runs from Forty Lane to Wembley High Road, whilst maintaining the Corridor’s capacity for vehicles. The junction of Wembley Hill Road and Empire Way has recently been improved and a number of junction improvements have been secured through existing Outline Planning Permissions. These are listed below together with other junction improvements to support future</i>	<u>junction improvements have been secured through existing Outline Planning Permissions. These are listed below together with other junction improvements to support future development not currently consented. The following junctions are expected to require improvement:</u> Where applicable, land take to undertake these improvements is identified on the proposals map <u>at Appendix C</u>. Potential improvements include: ❑ <u>Wembley Hill Road / Harrow Road / High Road – known as Wembley Triangle – capacity improvements can be delivered within the public highway and this improvement has been secured through existing Outline Planning Permissions</u> ❑ <u>Widening of the road bridge over the Chiltern Railway – would support a junction improvement at Wembley Triangle which improves urban realm and condition for pedestrians and cyclists, land take required.</u> ❑ <u>Wembley Hill Road / South Way – capacity improvements and associated land take have been secured through an existing Outline Planning Permission. Additional land take for further enhancement is identified at Appendix C.</u> ❑ <u>High Road / Park Lane</u> ❑ <u>High Road / Ealing Road</u> ❑ <u>Empire Way / Engineers Way - capacity improvements have been secured through an existing Outline Planning Permission. Agreed land take is identified at Appendix C.</u> ❑ <u>Empire Way / Fulton Road - capacity improvements have been secured through an existing Outline Planning Permission. Agreed land take is identified at Appendix C.</u> ❑ <u>Wembley Park Drive / Empire Way - capacity improvements have been secured through an existing Outline Planning Permission. Agreed land take is</u>
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		development not currently consented. Where applicable, land take to undertake these improvements is identified at Appendix C. Feasibility studies and detailed designs are required: - Wembley Hill Road / Harrow Road / High Road – known as Wembley Triangle – capacity improvements can be delivered within the public highway and this improvement has been secured through existing Outline Planning Permissions - Widening of the road bridge over the Chiltern Railway - land take	identified at Appendix C. - New junction between North End Road / Bridge Road – land take required - Bridge Road / Forty Lane – Feasibility study required under way and a contribution for the junction improvement has been secured through an existing Outline Planning Permission.
		- Wembley Hill Road / South Way – capacity improvements and associated land take have been secured through an existing Outline Planning Permission. Additional land take for further enhancement is identified at Appendix C. - High Road / Park Lane - High Road / Ealing Road - Empire Way / Engineers Way - capacity improvements have been secured through an existing Outline Planning Permission. Agreed land take is identified at Appendix C. - Empire Way / Fulton Road - capacity improvements have been secured through an existing Outline Planning Permission. Agreed land take is identified at Appendix C. - Wembley Park Drive / Empire Way - capacity improvements have been secured through an existing Outline Planning Permission. Agreed land take is identified at Appendix C.	

		2 New junction between North End Road / Bridge Road – land take. 2 Bridge Road / Forty Lane – capacity improvements can be delivered within the public highway and this improvement has been secured through an existing Outline Planning Permission.			
Dr Anoop Shah	6.15	All these junctions and road improvement schemes must prioritise pedestrian and cyclists safety and convenience from the outset, even if this results in slightly longer journey times for motorists. The only way to reduce congestion is to reduce traffic by encouraging active travel.	6.15	Agree. Highway schemes will look to improve conditions for pedestrians and cyclists especially along the Western Corridor. Encouraging active travel is a key component of the councils aim to reduce car mode share in Wembley. Changes to 6.8, 6.9 and Walking & Cycling section reflect this. Addition to 6.15: ...All junction s improvements will take into account the needs of pedestrians and cyclists with these users specifically prioritised on the Western Highway Corridor...	
Brent Cyclists	6.15	The possibility of land-take to improve roads is welcomed by us, as this would indicate that there should be no shortage of space to implement high-quality cycle lanes and tracks, separating cycling from both motor traffic and pedestrians. We would point planners to the London Cycling Campaign's "Go Dutch" principles (http://lcc.org.uk/pages/key-principles) as guidelines for the creation of a quality pedestrian and cycling environment that minimises conflict between road-users. Falling short of these we would not regard as "prioritisation" of cycling and walking on transport corridors.	6.15	Support welcomed. Changes to Walking and Cycling section provide more emphasis on reducing conflict between road users, including separate cycle lanes where appropriate.	

Wembley Stadium (FA Group)	6.15	The draft AAP goes on to state that "the junction of Wembley Hill Road and Empire Way has recently been improved". As we stated when we met with you, from our Stadium operations perspective the junction changes at Wembley Hill Road and Empire Way have seriously reduced the capacity of the traffic egress from the Stadium area after an event and this remains a concern that we need addressed as it is seriously impacting on our customers experience after an event, and thereby on our business.	Reference to improvement has been removed to in the updated 6.15. The Council will continue to work to improve performance of the route for traffic approaching from Wembley Park along Empire Way.
Wembley Stadium (FA Group)	6.15	We were informed by Quintain that they objected to the introduction of the proposed junction works and you are aware of the reservations provided by the Stadium at the time of consultation but nevertheless these works were implemented as part of the London 2012 funded proposals. We would like an undertaking that Brent Council will re-implement the previous junction priority at the junction of Wembley Hill Road with Empire Way to address the serious traffic congestion that is now frequently experienced by our customers during Stadium egress.	The primary objective of the conversion of the Wembley Hill Road/Empire Way gyratory to a roundabout was to provide a more attractive and easily accessible public space for the community. So it is not proposed to re-introduce the gyratory system. However, the operation of the junction will be reviewed to enhance performance.
QARA	6.15	"Bridge Road / Forty Lane" – a detailed feasibility study has <u>already</u> been conducted and improvements to this road junction have been specified!	Disagree. As part of the NW Lands planning application an outline scheme was developed for this junction. Brent Council did not accept the proposal but accepted that improvements needed to be made. The council has accepted a contribution towards the junction improvement and is currently undertaking a feasibility study into how to accommodate increased highway capacity while taking into account the needs of pedestrians and cyclists.

Dr Anoop Shah	6.16	As above, these junction improvements must incorporate best practice for cyclist and pedestrian facilities even if it slightly reduces motor traffic capacity. Cycle paths should be segregated at major junctions and cyclists may require their own traffic light phase. People can only be encouraged to cycle by high-quality Dutch-style cycle routes.	No change required here, cycle/walking section emphasises improvements for cyclists and pedestrians.
Quintain	6.17	The following paragraph should also be added within paragraph 6.17: <i>"Where land outside of the highway boundary is sought for improvement the acquisition will be sought by agreement but Compulsory Purchase procedures may be utilised where it is considered necessary to address existing deficiencies and deliver the Council's Core Strategy objectives."</i>	Agreed. Add to end of 6.17 Plans showing the land.....Appendix C. <u>Where land outside of the highway boundary is sought for improvement the acquisition will be sought by agreement, but Compulsory Purchase procedures may be utilised where it is considered necessary to address existing deficiencies and deliver the Council's Core Strategy objectives.</u>
TfL	WEM13	TfL would support the principle of reverting the existing gyratory to two-way working, subject to the necessary modelling demonstrating this can be achieved without prejudicing other users of the highway e.g. bus operations and cyclist. There would need to be good permeability with access to cycle lanes and safe pedestrian routes.	Support welcomed. Add to end of WEM13 Any improvements would need to be supported by modelling
Quintain	WEM13 13.43	There is reference in WEM13 and again in relation to W14 (Arena House and Crescent House) on page 102 to the connection of North End Road to Bridge Road. We do not consider this connection to be justified to mitigate the impacts of development and instead it appears mainly to be based on a need to provide circulation to and from the Industrial Estate on Stadium Event Days (para 6.35). In any event, it is not required to mitigate	Disagree with suggested text change. A new road link at North End Road is a key component of the overall strategy enabling the promotion of highway access into Wembley (and beyond) from the North Circular. The MVA Transport Strategy Review (2008) stated that the link will benefit the whole development area during Stadium events. The link will help to reduce traffic along Neasden Lane and Forty Lane allowing prioritisation for non-car modes. The connection may also facilitate

		the impacts of development currently consented in the regeneration area. We ask that this latter point is made clear and that the Council's justification is also set out for consideration. We also ask that the anticipated timing of the connection is clarified given the acknowledgement in paragraph 13.43 that the 1 Olympic Way site, is unlikely to be available in the medium term and therefore it should be clarified that this scheme is sought to be delivered on a phased basis. To that end, we ask that the final sentence of WEM13 is redrafted as follows: <i>"A new road connection will be provided in the longer term from North End Road to Bridge Road to provide an alternative route through Wembley Park, particularly on Stadium Event Days."</i>	improvements to bus services, depending on results of the Bus Strategy. North End Road can be delivered with minimal land-take at 1 Olympic Way and, from discussions at present with landowners, the council do not foresee any complications from the land-take.
Brent Cyclists	WEM13	We would much prefer the link from North End Road to Bridge Road to be for cycling only. This would be far cheaper to implement than a connection for motor vehicles, and, with work and highway adoption or land-take in the Atlas Way/Fourth Way/Fifth Way area, could provide a viable, high-quality corridor for walking and cycling via the Brent River path all the way from Stonebridge Park to Bridge Road. We suspect a contradiction between "favouring non-car users" and "improving general highway performance", as the latter most likely will be interpreted in terms of improving motor vehicle throughput, thus worsening the environment for non-car users. We note how picture 6.1 of Great Central way shows a low-quality cycle path painted on a pavement, with lack of priority at a side road junction ? exactly the	Disagree. If North End Road was cycle only it would not facilitate our strategy to remove traffic from the main development area. The North End Road connection will improve cycle access by removing the current ramps.

Wembley Stadium (FA Group)	WEM13	sort of thing we do not want to see coming out of this redevelopment. We strongly support your proposals for Policy WEM 13 for the road and junction improvements to the Stadium Access Corridor and Western Access Corridor. This states that the Council will develop improved highway access for car travel from the North Circular Road by improving the Stadium Access Corridor and the Western Access Corridor with South Way being widened and two-way working restored to both South Way and Fifth Way. You propose that the remaining parts of the gyratory system will be returned to two way working as development comes forward on adjacent sites and that a new road connection will be provided from North End Road to Bridge Road to provide an alternative route through Wembley Park. These proposals are very welcome and will be strongly supported by the Stadium. Overall though we will want to ensure that the maximum egress capacity is provided for the period after Stadium events as part of the SAC and WAC proposals being developed to ensure that the experience of our customers who are allocated car and coach parking spaces is improved. This means that we will want you to revise your cycle lane proposals along the SAC which reduce the overall width from three lanes to only two lanes and that the cycle lane facilities should be provided as a shared-use on the footways. With the low level of pedestrian and cycle flows through the industrial estate the shared	Support welcomed. During Stadium egress the ability for three lanes of traffic along South Way will remain.
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Henry Lancashire	WEM13	use can clearly be accommodated and is a more efficient use of the highway. I have recently had the chance to read the "Wembley Area Action Plan Issues and Options consultation" document, and would like to raise some concerns regarding the proposal to open a new access road from North End Road to Bridge Road. 1) North End Road is currently a quiet residential road, providing no through access for motor vehicles. It is however, a thoroughfare for the residents of Empire Court, Danes Court and Victoria Hall. During "rush hour" the pedestrianised square (picture and map) can become congested. This was particularly apparent during term-times before the recent relocation of the College of North West London. 2) The approach to Bridge Road conflicts with a popular bus stop which is regularly accessed on foot from Wembley Park Underground Station, North End Road and Olympic Way (picture and map). A new major road would significantly increase the difficult and danger associated with pedestrian access public transport. 3) The current access from North End Road to Olympic Way enables cyclists to take a quiet, safer route from the Brent River Park towards Olympic Way and Brook avenue. This route is only likely to increase in popularity if the proposed bridge across	The re-opening of North End Road would provide a number of benefits that meet the wider objectives of our transport strategy for Wembley. We would make the following comments on your points: 1) Pedestrian movements will be considered in the design with footways designed accordingly. New crossing facilities will be provided across the new North End Road and also across Bridge Road which will improve conditions for pedestrians. 2) Facilities will be in place to ensure the public can access public transport as described above. The bus stop will be moved slightly to the south. The bus stop can be accessed via the Olympic Way underpass to avoid the need to cross any roads. The North End Road improvement will also provide the opportunity for improved bus interchange at this location. 3) The proposed bridge to St David's Close will likely reduce cycle movements along North End Road by offering an alternative North-South connection. Advanced Stop Lines will be incorporated into the junction to provide facilities for cyclists. 4) Negotiations are ongoing in terms of land acquisition but we are aiming to minimise the cost. The scheme has been revised to remove the
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		the Chiltern Line is built between St. David's Close and Fourth Way/Atlas Rd.. Converting North End Road to a through route would significantly increase the danger associated with this route. 4) The required land acquisition will be a) costly and b) damaging. In particular the green space associated with the river opposite Victoria Hall will be lost. This is a valuable wildlife corridor used by species including wrens, robins, blackbirds and Pipistrelle bats 5) The route is physically unsuitable due to lines-of-sight along North End Road / Albion Way. This already leads to vehicles cutting the corner entering Albion Way from N. End Road at low speeds. An increased speed limit (likely associated with the conversion of this to a through route, and at least in part due to the slope from Bridge Road) is incompatible with the current layout and will require loss of pavement/green space (see 4). An alternative proposal, keeping the current pedestrian / cyclist only access while improving the almost 100m of ramps and steps alongside Olympic Way (picture and map) would be preferable. A continuous ramp (without turns) parallel to Olympic Way with steps running perpendicular onto Olympic Way would significantly improve access. In addition the requirement to ascend onto Bridge Road from North End Road before descending onto Olympic Way should be removed.	need for land from Victoria Hall. 5) This junction will be redesigned to standard junctions configurations, council has option to improve this junction if it wishes.
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		With this simple, less costly, alternative the pedestrian and cyclist access can remain unimpaired while the Wembley Park Station end of North End Road can be opened further for use as a public space (similar to Olympic Way NW of Bridge Road).		
QARA	WEM13	ADD "Seek funding and improvement to all main road junctions that are near to capacity".		Disagree, 6.15 describes the required improvements which will need to be funded. It does not need to be added to WEM13.
Quintain	WEM14	Paragraph 6.10 describes a strategy for the western corridor. We ask to be consulted on this strategy as it is prepared, since the corridor provides the western boundary to a substantial proportion of our landholdings. In particular, we need to understand how policy WEM14 can be implemented without impacting adversely on vehicle capacity within the corridor. Therefore we ask that the second sentence of WEM14 is amended to read as follows: <i>"Junction and highway improvements along this route are required to facilitate development and performance, including for non-car users but not so as to reduce capacity for vehicles."</i>		These points are accepted in part. Policy WEM14 is proposed to be amended to read "...junction and highway improvements along this route are required to facilitate development and will be designed to favour these non-car users as well as improve general highway performance, including for non-car users.
Quintain	WEM14	WEM14 sets out how highway improvements through the whole of the Regeneration Area to the west are sought to be developed to favour cyclists and pedestrians. We have set out a proposed alteration to WEM14 above as we need to understand how these can be brought forward without further constraining vehicle capacity along this corridor. Further, we need to see evidence		Accepted that there is a need for clarification. Add to end of WEM14: <u>Land for improvements will be determined and secured when planning consent is granted for re-development of the site. This will ensure that on re-development, improvements for public transport users, pedestrians and cyclist will be secured.</u>

Wembley Stadium (FA Group)	WEM14	that implementation of a widened footway and a bus lane along Wembley High Road as set out in W1 will not constrain capacity in this location and on the wider highway network. We query why the required land take referred to in W1 to deliver these facilities is not shown on a Map in Appendix C and it should be clarified where relevant land has already been secured through extant planning permissions. This information should be provided to facilitate consultation.	
		The specific issue with the restricted access to the West for our customers who are using an allocated car space as part of their overall package with the Stadium gives rise to further concerns that we have about your proposals for the Western Highway Corridor. We support the proposals for sustainable transport but we also have to preserve a level of service for our customers who elect to travel by car and who have made an important investment in the Stadium business that underpins the confidence in predicted growth across the Wembley AAP area. We therefore have to underline our concern that all future highway and junction proposals should be reviewed and agreed with the needs of Stadium vehicle access and egress in mind to avoid the reduced capacity that has been caused by the Wembley Hill Road and Empire Way changes. This includes the proposed changes to Wembley Triangle, the junctions along Wembley Hill Road, Empire Way and Bridge Road and the junction with Forty Lane. We therefore have to state our reservations about	Disagree to changes to WEM14. We should not be referring to single issue points like this within the policies. The Council recognises that vehicle egress from the stadium is an important consideration in designing new road and junction improvements. Accepted that there is a need for clarification. End of WEM14 to read: "land for improvements will be determined and secured when planning consent is granted for re-development of the site. This will ensure that on re-development, improvements for public transport users, pedestrians and cyclist will be secured"

			policy WEM 14 for the Western Highway Corridor for the reasons we have set out above and would ask that you revise this to include at the very least retaining or ideally increasing vehicle capacity for stadium egress.	
QARA	WEM14		A muddled paragraph – split into two clearly defined objective paragraphs. ADD – motor cycles / scooters.	See earlier point on motorcycles.
Brent Cyclists	6.18		We find it hard to understand the balance that is being talked about in the Car Parking Strategy. Regeneration is not synonymous with encouraging car-use. Why is it necessary to provide a level of car-parking similar to other competing centres? Why not compete on something else, for example, non-car accessibility, and quality of environment? It is not possible to achieve these conflicting objectives at the same time. This appears to be a policy for greater car-dependence of Wembley, and we predict the intended modal shift away from car-use will not materialise unless there is a thorough rethink here.	Point accepted. As with the council's response to comments on paragraph 6.11, it is recognised that in bringing forward development in Wembley, the levels of car parking provided cannot be at the same levels as other strategic centres in North West London or beyond, and that emphasis needs to be placed on access by modes other than the car. At the same time, however, it has to be accepted that there is a need for development to be economically viable and this will require recognition that there should be some access by car. Car parking standards are therefore maximum standards and have been pitched at a level to provide an appropriate balance. It is proposed that the paragraph be amended as follows: 6.18.....In order to promote such development it is necessary to provide a level of car parking similar to other competing to enable Wembley to compete with other centres and development that can attract these people that wish to travel by car whilst encouraging people to use other modes of travel, particularly public transport.....
Carole Spolander	6.18		Parking has to be reasonably priced - one suggestion would be to obtain a coin at the cinema for free parking as done in Harrow.	Point noted and the developers of the new cinema and leisure complex will be advised about this option for charging for parking.

TfL	6.19 WEM15 WEM16	The Mayor's transport strategy promotes a smoothing of traffic flow across London. The London Plan would like to see a low number in car parking available for new developments particularly where accessibility to public transport is high. Wembley's AAP seems to suggest the area will be beneficial to cars particularly for town centre uses. TfL would like to see more encouragement for the use of Public Transport. Paragraph 6.19 in 'parking strategy' states that parking will be mainly focused on the edges of the town centre which and should be in compliance with the London Plan standards for retail. Whilst the proposal talks about providing an appropriate balance of car parking provision for town centre uses in order to encourage development, this should also take account of measures to promote public transport or travel planning initiatives in order to reduce car parking to a minimum. Whilst a car parking strategy is referred to no details are provided. Given the high PTAL score, TfL supports the consistency with London Plan policy 6.13 'Parking' and encourages the implementation of car free developments, where possible, whilst still providing for blue badge holders.	Paragraph 6.18 is proposed to be amended as follows so that it places less emphasis on meeting the needs of those who wish to travel by car. 6.18.....In order to promote such development it is necessary to provide a level of car parking similar to other centres and development that can attract those people that wish to travel by car whilst encouraging people to use other modes of travel, particularly public transport..... Paragraph 6.19 deals with the location of additional parking provided, in accordance with parking standards, to meet the needs of new development so it is not considered that this needs amendment. A cross reference will be provided to the Car Park Strategy document. EVCPs will be provided in accordance with London Plan policy which it is unnecessary to repeat here.
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		Electric Vehicle Charging Points (EVCPs) should also be provided on developments in order to be consistent with the London Plan minimum standards.	
QARA	6.19 WEM16	On what basis have these parking standard figures been produced; at the moment they appear to have "suspect" credentials.	The revised standards are based upon a number of factors including having regard to the London Plan standards, a study of car parking undertaken on behalf of the borough by Steer Davies Gleave and upon the council's own experience of demand for car parking in Wembley.
QARA	6.20	ADD – "the improvement of road junctions will be factored in so as to allow further development".	This would be an inappropriate addition to this paragraph.
Quintain	WEM15 WEM16	We support the strategy which <i>'balances the need to minimise car use whilst ensuring that the area is also attractive to those who wish to come by car'</i> , as set out in paragraph 6.8. We also support the ambition in paragraph 6.18 which acknowledges the need to provide sufficient car parking to allow Wembley to compete successfully with other nearby centres. However, the levels of retail parking standards set out in relation to WEM16 are too onerous and not consistent with the adopted London Plan. We ask that these are amended so that Wembley can compete successfully with other centres. We also ask that WEM15 is clarified to be explicit about the proposed locations of car parking set out in the Framework Parking Strategy and to ensure that there is no conflict in the wording between WEM15 and W1.	It is not accepted that the car parking standards for retail are inconsistent with the London Plan. The London Plan standards are maximum standards and it is recognised in the Plan that "Boroughs should take into account local issues and estimates of local demand in setting appropriate standards..." (para. 6.44 of the London Plan). The standards for Wembley have been drawn up after taking account of the need to achieve a balance between access for the car user whilst achieving the objective of reducing the modal share of trips by car across Wembley. It is notable that the standard proposed sits between the more onerous standards that apply in inner London and the more generous standards that apply in outer boroughs.
Wembley Stadium (FA Group)	WEM15	We discussed our views on parking for Wembley Stadium when we met. As you are aware the new	It is acknowledged that the Stadium is an exemplar in achieving a modal share of trips that are made by public

		Stadium has access to 2,900 car parking spaces for a major event which is a significant reduction from the 7,200 car parking spaces for the old Stadium up to 2002 and clearly leads the way as part of your overall transport objectives for delivering sustainable development in this growth area. We highlighted our main parking issue that has remained an on-going problem for our business for decades and that is the main cause of the additional delay and congestion that we experience as a result of the estimated 2,000 cars that are parked in pirate car parks along our egress routes through the Wembley industrial estate. This on-going problem is a serious detriment to our business and we need support and action from Brent Council working in partnership (but leading on the issue) with other enforcement agencies. We ask that you draft and include a specific AAP policy to address this on-going negative impact on the Stadium business.	transport as opposed to trips to the stadium by car, and this objective is being undermined by pirate contract parking. It is also acknowledged that pirate / contract parking for events at the stadium is undermining the objectives of limiting parking. The council will continue to work with the stadium to identify illegal contract parking and will use its powers to take action where appropriate. Add para after 6.20: <u>Car parking dedicated for events at the stadium is officially limited to 2,900 spaces. This is down from 7,200 spaces for the old stadium because the aim is to encourage a more sustainable mode of travel to events and reduce congestion on local roads.</u> <u>Unfortunately, pirate contract parking is undermining the objectives of limiting parking. Priorities for vehicular access to the stadium need to balance the use of the area by all vehicles and pedestrians. The Wembley transport strategy identifies priorities for different road users along the approaches into Wembley. Working with key stakeholders, the Council will seek to minimise the negative effect of the use of contract pirate car parking.</u>
Dr Anoop Shah	6.23	There should also be minimum cycle parking standards - particularly for high rise flats e.g. a minimum of 1 cycle parking space per bedroom.	Reference will be made in paragraph 6.34 to the need to apply London Plan cycle parking standards. These are minimum standards.
Brent Cyclists	6.23	While we believe in low car parking standards for retail and leisure, as stated at 6.1, we are concerned that adopting low residential parking standards leads to streets and pavements cluttered with the overspill cars that people buy, as this has been our experience with this Brent policy so far.	Appropriate car parking standards are based upon evidence of demand amongst other things. Experience of development in Wembley has shown that not all parking provided has been used and that a lower standard may be appropriate. Additionally, the 2011 Census shows that there are only 5 more cars in Brent than there were in

QARA	WEM16	“good public transport “needs defining.	2001, despite the level of new development over the period. This also suggests that lower standards may be appropriate. ‘Good’ public transport is defined by TfL as being PTAL levels 4 and above. This will be clarified in the Glossary to the AAP.
TfL	6.25	TfL would suggest that the statement in this paragraph be redrafted as the bus network provides good connections including the following routes which serve the area. - Ealing to Wembley, route 83 - Ealing to Brent Cross, route 112 - Wembley to Brent Cross, route 182 - Wembley to Park Royal, route 224 (roundabout routing) - Acton to Park Royal, route 440 - Any changes to the bus network should be agreed with TfL and should not be restricted to the proposals set out in the AAP. - TfL would also like reference to a Wembley Bus strategy which is anticipated to be developed by Brent Council as part of the cumulative impact study.	Paragraph reworded to highlight orbital access is comparatively poor compared to radial public transport and refer to congestion being a particular issue. The level of detail suggested by TfL in terms of referring to individual routes it too high. Agreed and clearer reference made. Agreed and direct reference to Wembley Bus Strategy included. 6.25: <u>While rail and underground provides good radial connections, orbital access and in particular connections to the major centres of Ealing and Brent Cross, and the major employment areas of Wembley Park and Park Royal is poor are provided by bus. Many of the orbital routes suffer from high levels of congestion making bus a less attractive option for these journeys.</u> As development intensifies, and in order to encourage investment in appropriate development in line with

			regeneration initiatives and further regeneration, improvements to orbital connectivity and linkage with key centres will be pursued. Brent, together with neighbouring local authorities and partnerships, has been supportive of new and/or improved connections and is promoting such initiatives with Transport for London as part of its involvement in <u>through the councils input into the West Sub Regional Transport Plan. However, it must be recognised that such initiatives require the council to justify to Transport for London that any improvement proposals are compatible and consistent with the West Sub Regional Transport Plan. Proposals may subsequently require funding support for Transport for London, and requests for additional services will need to be prioritised against other requests. In addition, the council is currently working with Transport for London on developing future Bus Strategy for Wembley which will identify a viable future bus network which supports future development phasing together with identifying the bus infrastructure required to support that network. It is recognised that any changes to the bus network will have to be agreed with TfL and that changes will not be restricted to the proposals set out in this AAP.</u> In response to the above requirements, to orbital connectivity challenges identified within the West London Sub Regional Plan, a Strategic Corridor study... [into para 6.26]
Quintain	6.26	In paragraph 6.26 there is reference to a Strategy Corridor Study in relation to public transport improvements along the Wembley Hill Road / Forty Lane corridor. We ask to see this study and for the	Westrans Strategic Corridor Study supplied to Quintain.

Quintain	6.28	opportunity to review and comment upon it. There is reference to a need for improvements to Wembley Stadium Station ticket hall at paragraph 6.28 and we ask that it is made clear that these improvements have been secured through the Outline Permission in relation to the South Way / Wembley Stadium Station (W6) and will come forward as development progresses. The following sentence should be added to this paragraph: <i>“These improvements have been secured through the extant outline planning permission on land surrounding Wembley Stadium Station.”</i>	Agreed, add the below text to the end of 6.28. <u>The Wembley Stadium station improvements have been secured through the extant outline planning permission on land surrounding Wembley Stadium Station.</u>
Quintain	6.31	In paragraph 6.31 there is reference to the ongoing development of a strategy for bus and infrastructure enhancements. Again, we cannot support the policies emerging from that strategy without having had the opportunity to review and comment on the strategy itself. We will be pleased to have the opportunity to review the strategy.	We hope to discuss emerging options from the Bus Strategy with yourselves.
Quintain	Priorities for bus service improvements W8	In relation to buses, we acknowledge and broadly support the ambition to use the Boulevard to improve pedestrian and cycle links as set out in paragraph 6.19. This could go some way to realising the ambition set out in paragraph 6.33 where the provision of car-free spaces will promote walking. This in turn is related to the statement in paragraph 6.30 querying how buses can successfully integrate with pedestrians on the Boulevard and we wish to investigate this further with you. The priority for bus service improvement on page 50 seems fixed on the principle of buses using the Boulevard and this is reiterated in Site	A Bus Strategy is currently being developed for the Council, and this will look at the potential for operating buses within the wider masterplan area, including the Boulevard / Olympic Way, and supporting infrastructure to facilitate bus routing along the Boulevard. This study will be completed by spring 2013 and the results will be available to support the submission version of the strategy. The suggested changes are accepted, subject to the findings of the Bus Strategy, expected in spring 2013, which will make recommendations on service routing (either amendments to existing or new routes) and supporting infrastructure.

		Proposal W8. We acknowledge that bus accessibility is key but the detail of how that is achieved is not a material consideration for the AAP. The policies and text as drafted are therefore too prescriptive and indeed your own text identifies this issue at paragraph 6.30. This should be amended in both instances to target improved bus access to the Comprehensive Development Area. To that end, we ask that the fourth bullet point under Priorities for Bus Service Improvement is redrafted as follows: <i>“Seek improved bus access to the Comprehensive Development Area surrounding the Stadium.”</i> This will bring the priority in line with paragraph 6.30. We would also ask that the third sentence of W8 reads: <i>“The Boulevard connection could be used by buses, taxis and cycles.”</i> And that the penultimate sentence of W8 reads: <i>“Royal Route could provide an at-grade crossing with the Boulevard to provide for public transport access.”</i> Other priorities in bus service improvement seek the implementation of more bus priority schemes and we will need to see evidence that the impacts on wider network capacities have been considered in bringing these forward.		
Brent Cyclists	6.33	While we support the general thrust here, it is important not to conflate walking and cycling. They are very different modes of transport requiring different infrastructure. Bikes and pedestrians travel at very different speeds, have different	Agree.	Proposed changes to Walking and Cycling chapter seek to address priorities for pedestrians and cyclists separately.

		momentum, and manoeuvre and balance and interact with motor traffic differently. The characteristics of cycling need to be understood if conflicts with other modes are not to be generated.	Proposed changes to 6.33: <u>Pedestrians</u> 6.33 If a modal shift away from the car is to be achieved, then enhancement of the pedestrian environment, together with public transport improvements, will encourage people to choose alternatives to the car. Also, The provision of <u>interconnected, safe, well designed routes and attractive spaces where people can gather free from the intrusion of vehicles will help secure a pedestrian-friendly environment promote walking</u>. A number of new public spaces have <u>already</u> been provided, such as an expanded Central Square in Wembley and the new Stadium and Arena Squares close to the stadium. Further <u>Additional</u> public spaces are required when further development takes place, as set out in the Core Strategy. Clearly, <u>Exclusively</u> Pedestrian streets will also provide a safe and attractive environment, especially for shoppers. The needs of all pedestrians, including disabled and older people, should be incorporated into the design of public space. While there is a general presumption that cycling may be acceptable in pedestrianized areas, an assessment of the overall risk will be necessary. It is important also to recognise the benefits of cycling; both walking and cycling which can bring health benefits as well as delivering modal shift to help reduce carbon emissions.
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	Add new sentence after 6.33: <u>Shared space can also be used to improve the public realm and environment for pedestrians. Shared space is a design approach that seeks to change the way streets operate by reducing the dominance of motor vehicles, primarily through lower speeds and encouraging drivers to behave more appropriately towards pedestrians. Shared space is only appropriate in low-trafficked areas, such as the new residential district (Site W18). It will not be supported in through-routes.</u> Move 6.35 to Pedestrians section and proposed changes: The needs of spectators coming to the Stadium are also important. There are still some locations where there is potential conflict between crowds and traffic, such as along Wembley High Road and the crossing of Wembley Hill Road by the White Horse Bridge. It is also an <u>The option to remove the pedestrian ramp over Engineers Way to the Stadium from Olympic Way and replace it with steps could be considered as part of future development.</u> This would mean, however, that an alternative east – west through-route for vehicular traffic would be needed, especially for event days. The council considers that <u>supports the removal of the pedway</u>

TfL	6.34 WEM17	The AAP should actively promote cycling opportunities e.g. secure cycle parking and cycle routes in order to be consistent with the London Plan.	<u>pedestrian ramp</u> and its replacement with an improved access arrangement between Olympic Way and the Stadium would greatly enhance the southern part of Olympic Way and address remove what is currently a poor street environment. It would be supportive of the removal of the pedestrian ramps whilst ensuring providing that access to the Stadium and emergency egress are integral to the design, remains adequate and that any changes help address what is currently a poor street environment. Agree. Proposed changes to 6.34: <u>Cyclists</u> The provision of shared surfaces, where all the users of streets share the public realm, is a recognised way of improving the environment and safety of pedestrians and cyclists as it leads to much more considerate use by drivers of motor vehicles. Clearly, exclusively pedestrian streets will also provide a safe and attractive environment, especially for shoppers, and Brent is one of the Mayor's 'biking boroughs' with the intention of increasing cycling levels in outer London. There is an existing network of dedicated signed cycle routes (shown on Map X) and stretches of secondary local routes which will provide a degree of encourage people to access into the area Wembley by bicycle. However, cycle links into Wembley are poor or non-existent with a
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		<u>number of physical barriers such as railways, the North Circular and the River Brent. Connections between Wembley and Willesden are particularly limited.</u> <u>Map X shows existing cycle infrastructure, proposed improvements within the AAP area, and identifies possible new links across major barriers. The Wembley to Ealing cycle corridor is identified as a priority for infrastructure investment in Brent's Local Implementation Plan 2011-14 (LIP2). Improvements and new cycling infrastructure will be planned through the Local Implementation Plan, Strategic Infrastructure Plan, and Transport Strategy. Funding will be secured through developer contributions, the Biking Boroughs Programme, TfL and other future funding streams. The London Cycle Network aims to provide convenient, safe and accessible radial and orbital linkages throughout London. Wherever possible, these should be segregated and protected from major road traffic. Limited facilities and routes exist in the Wembley area, therefore further enhancements would be desirable</u> Add new paras in Cycling section: <u>New cycling infrastructure should be safe and attractive to cycle users with varying levels of confidence and experience. Bikes and pedestrians travel at very different speeds and have conflicting</u>
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	<u>priorities, and there should be clear differentiation of cycle and pedestrian space. Therefore, shared use routes, where cyclists and pedestrians share the same off-carriage way route without segregation, will not normally be appropriate.</u> <u>Wembley's industrial estate attracts heavy good vehicles (HGVs) which are a particular threat to cyclists' safety, accounting for half of all cyclist deaths in London. Given that a primary function of the industrial estate is circulation and parking of HGV traffic, further work is needed to assess the suitability of cycle routes through the industrial area. Cycle routes are unlikely to be appropriate unless there is a segregated, protected cycle-only facility with cyclists given priority in space and time at junctions.</u> <u>All routes which affect cyclists should be designed in line with prevailing best practice guidance. In particular, cycle lanes and junction improvements should address the vulnerability of cyclists through segregation and protection from major road traffic.</u> <u>The council will work in partnership with key stakeholders, such as TfL, cycling groups and developers, to deliver and promote cycling initiatives. This includes creating effective local links to key destinations such as open spaces, town centres and strategic cycling corridors. Developers</u>

			<u>will be required to integrate the needs of cyclists into the design of their schemes and provide cycle parking in line with London Plan policies. The council will liaise with TfL to increase the provision of secure public cycle parking at Wembley Park, Wembley Stadium and Wembley Central stations. Wembley regeneration area was identified as a potential Cycle Hub within the TfL Brent Biking Borough programme. Cycle Hubs are locations that have potential to increase cycling levels, and can be a focus for cycling investment and initiatives. The council will continue to promote Wembley as an area suitable for a Cycle Hub. Where appropriate, cycle hire initiatives will be supported. and options for a public cycle hire scheme, such as the Central London scheme, could also be considered.</u>
Dr Anoop Shah	6.34	Shared space is only appropriate in public places which are destinations in their own right and not a through route for motor traffic. Otherwise pedestrians are intimidated by motor traffic, and this can be particularly difficult for blind and elderly people. The London Cycle Network was never completed, and there are fragments of cycle path which are not joined up. The council needs to devise a comprehensive scheme of high quality cycle paths in consultation with Brent Cyclists. The number of motor vehicle lanes should be reduced and car parking moved away from main roads if necessary in order to provide continuous, safe,	Disagree, shared spaces are appropriate on through links but in Wembley we will be promoting them on quieter streets only.

Brent Cyclists	6.34	segregated cycle paths. A public cycle hire scheme is a low priority for Brent; first it is important to have safe and convenient routes on which to cycle. Indeed "Wherever possible, these [the cycle routes] should be segregated and protected from major road traffic". Unfortunately, the "wherever possible" clause could prove to be a universal get-out for the provision of the sort of quality infrastructure that is required. Choices need to be made about the use of space on main roads, and in the past those choices have almost invariably been made against providing useable, safe, unobstructed space for cycling. Therefore proper criteria need to be applied to determine where separation of cycle traffic from motor traffic is necessary, on the basis of flow and speed of motor traffic. Transport for London provide such criteria in their Cycle Design Standards (though they have been rarely applied) (2005, Chapter 4). Again, we refer to London Cycling Campaign's "Go Dutch" principles (http://lcc.org.uk/pages/key-principles) for guidance on high-quality provision for cycling, and to the pages of the Cycling Embassy of Great Britain (http://www.cycling-embassy.org.uk). Shared space for cyclists and pedestrians is only appropriate in very limited circumstances. Particularly in a densely-populated and trafficked urban environment, there is much potential for conflict, and, in general, the default should be NOT to mix up pedestrian and cycle traffic. In general, there should be clear differentiation and delineation of cycle and pedestrian space, particularly on routes which are intended as high-	Agree. See suggested changes to 6.34 above.
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		throughput, efficient, strategic corridors for cycling. Shared-surface pavements in general are not acceptable to us, and, in the context of the major redevelopment of this area, it should be possible to avoid them. Occasionally shared space for cyclists and pedestrians and motor traffic is appropriate, particularly in places that are final destinations, not places of throughput, and where motor traffic has been reduced to essential, occasional access. However, the statement "The provision of shared surfaces, where all the users of streets share the public realm, is a recognised way of improving the environment and safety of pedestrians and cyclists as it leads to much more considerate use by drivers of motor vehicles" we regard as completely untrue and without factual foundation. Experiments with shared space of this type in London at Exhibition Road and Sloane Square in Westminster, Seven Dials and Byng Place in Camden, and elsewhere, have shown shared surfaces DO NOT lead to more considerate use by drivers of motor vehicles. In fact, such shared spaces can function to intimidate and exclude the vulnerable from the streets, particularly the elderly and disabled, and most of all the blind. We recommend absolutely against copying such examples in Brent. It is to be noted that, though shared space was originally a Dutch concept, it has not been widely applied by the Dutch in recent times, and the basis of Dutch road design remains the separation of pedestrians, cyclists and motor vehicles from one another. We believe this to be a sound and proven principle to be followed in	
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		general. Shared surfaces with motor vehicles are only sensible where there are no through-routes for motor vehicles and only very limited and controlled access traffic is present. The picture of the cycle path on Great Central Way (picture 6.5) is an object lesson in what NOT to do. This sort of path creates pedestrian-cycle conflict and confusion, and fails to provide an efficient, high-priority route for cycling. There needs to be a clear level or surface difference for the pedestrian and cycle space, and cycle priority at junctions with minor roads. At major intersections, in general, proper signalisation for the cycle flow is needed to avoid conflicts with motor traffic. Better examples of cycle tracks in London can be found in Royal College Street and Torrington Place (Camden) and on Cycle Superhighway 3 on the A13 in Barking and at Cable Street in Tower Hamlets.	
Clive Gomes	6.34	There has been widespread support for the London Cycling Campaign's 'Love London, Go Dutch campaign' http://lcc.org.uk/pages/key-principles and The Times 'Cities fit for Cycling' campaign http://www.thetimes.co.uk/tto/public/cyclesafety/ from all the main political parties and the Mayor of London. This redevelopment gives Brent Council an opportunity to create decent segregated cycle lanes that will enable the residents to cycle safely to work and to the shops. With the success in the Olympics more people than ever are buying cycles. The death toll of cyclists	Agree. See suggested changes to 6.34 above.

			killed on the road is increasing and will no doubt increase further unless something is done about it. Please use the opportunity and be the first London Council to do something that will make Brent proud and keep cyclists safe.	
Brent Cyclists	6.35		The connection between Olympic Way and Bridge Road and North End Road is also poor, with an excessively long zig-zag ramp the only access to Olympic Way on the south side of Bridge Road. Access from the north side of Bridge Road is easier, but this will often involve crossing a heavy flow of traffic on Bridge Road to access. This whole arrangement needs radical rethinking for both pedestrians and cyclists, the latter being not catered for at all at the moment, obstructed by barriers from making any kind of easy connection between these roads.	See response to WEM13
Brent Cyclists	6.36		We fully support the creation of a new pedestrian and cycle link between St David's Close and the development area. As we have already noted, this is a critical missing link in the current infrastructure. It is needed to connect "Neasden Village" with Wembley Park, and it should really be regarded as a top priority for funding, and should be built to a decent capacity to cater for two-way separated pedestrian and cycle flows. It should not be obstructed with any kinds of barriers for cycling, and should have cycleable ramps that do not require dismounting. The other high-priority link that is required is a new bridge over the Chiltern Line at Sherrans Farm Open Space to provide cycle and pedestrian access to the development area	See changes above re: cycle routes. Proposed changes to 6.36: Although <u>some</u> improvements to pedestrian and cycle facilities have taken place, there are still barriers to movement across the main rail lines which bound the eastern part of the area. A study into additional bridge crossings recommended a bridge over the railway lines (Underground and Chiltern) near St David's Close <u>to overcome existing deficiencies</u> as it was both feasible and offered substantial connectivity benefits by linking green

		from the south. The same design criteria should apply to this link. It should not be forgotten that access to the area by cycle will remain very poor unless also new, good-quality crossings of the North Circular Road are provided, and additionally an upgraded crossing of the West Coast Main Line at Lyon Park Avenue. In respect of policy WEM13: We repeat here our caution about shared surfaces. They are only appropriate in limited circumstances, and should not be regarded as a good substitute for the quality, prioritised cycle infrastructure that is necessary to substantially raise cycling modal share. Pedestrianised areas may sometimes appropriately be cycle routes as well, or at less busy times, but clear distinctions in the use of surfaces in a busy place should normally be made. We don't know what is meant by a "cycle hub".	spaces, for example from Fryent Country Park <u>through at Chalkhill to development sites and provides a strategic link between</u> existing and future footpaths along the River Brent and Wealdstone Brook. This proposed bridge is shown on the <u>Proposals Map 6.1 and 6.2</u>, and a plan showing the land take required to support this improvement is shown in Appendix C. Add new para after 6.36: To ensure Wembley is a legible destination for visitors, the area <u>will be made more accessible to pedestrians and cyclists through improvements to signage, for example through the 'Legible London' initiative. This will be particularly focused on creating links between the three stations, local attractions, open spaces, cycle routes and canal.</u>
Quintain	WEM17	Within WEM17 there is reference under point 2 to the reduction in the proportion of through traffic using the town centre. We ask for confirmation as to how this can be achieved without significantly constraining capacity and increasing pressure on other parts of the highway network. In the meantime we would ask that point 2 is redrafted as follows: <i>"Promote space for pedestrians, cyclists and public transport users in the traditional town centre and reduce the proportion of through traffic using routes through Wembley town centre in ways that maintain capacity for vehicles on the wider"</i>	Change to WEM17 bullet: <u>Prioritising space for pedestrians, cyclists and public transport users in Wembley the traditional town centre and reducing the proportion of through traffic using routes through Wembley the town centre in ways that maintain capacity for vehicles on the wider network</u>

Cllr Janice Long Lead Member for Housing Harlesden Ward LB Brent	WEM17	<i>network."</i> I am writing to express my objection to a particular part of policy WEM 17, Walking and cycling. The first point "Shared surfaces where appropriate in the new urban quarter close to the Stadium." Shared surfaces are never appropriate as they make the areas no go areas for many disabled people. Blind people need a kerb to manoeuvre in an area as it is an easily discernible contrast between a road and pavement. Shared surfaces are opposed by Guide Dogs for the Blind and also The National Federation of the Blind. Shared surfaces are also opposed by people with learning disabilities and the organisations that represent them, eg Mencap. People with a learning disability are taught that staying on the pavement, which they identify by a kerb, means they're safe. If there is no kerb they do not know who has priority and feel unsafe and insecure. In the 21st century we promote independent living for people with disabilities. Introducing shared surfaces takes away that independence.	See also above comments re: shared surfaces. The council has approved guidance, The Brent Placemaking Guide, May 2011, that considers shared surfaces to be appropriate in certain circumstances. There can be considerable advantages, for example as currently agreed for the NW Lands development where at certain times of day surfaces are proposed to be shared with vehicles servicing shops. This allows for the development of new shops without the need for separate servicing areas The area around the stadium will need to cater for a broad cross section of users, and these users will all have different needs. Shared surfaces have been identified as a potential tool in the toolkit for the new urban quarter. The detail of how they would be designed is not yet defined in detail. Shared space areas need not be any less safe than conventional spaces – with good design, shared spaces can be as safe. Conventional spaces can have safety issues associated with kerbs if these are not well designed. In the new urban quarter, we would look to provide "alternative guidance" if the kerb line is insufficient or absent. These could be building lines or drainage features which will assist with navigation. Proposed changes to WEM17: WEM 17 Walking and Cycling
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		Measures- The council will <u>seek to implement to</u> encourage walking and cycling by: are: 1- Allowing shared surfaces in low trafficked areas in the new urban quarter close to the Stadium. 2- <u>Promote</u> <u>Prioritising space for pedestrians, cyclists and public transport users in Wembley the</u> traditional town centre and reducing the proportion of through traffic using routes through <u>Wembley the</u> town centre <u>in ways that maintain capacity for vehicles on the wider network</u> 5- <u>Ensuring</u> e that any junction/ highway improvements and new streets <u>are designed to prioritise take due account of pedestrian/ cycle access, convenience and ease of movement</u> and the need to ensure a high quality public realm. 3- <u>Provide exclusively pedestrian streets in locations with the heaviest footfall, and restrict servicing to early morning only.</u> <u>Ensuring that streets and spaces are designed so that conflict between road users is reduced and vulnerable users are protected</u> <u>Requiring appropriate cycling facilities, such as parking, showers and storage, as part of all major new developments and refurbishments</u>
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			<u>Identifying new cycle routes and signage opportunities for commuting, leisure and local cycling trips</u> <u>Maximising cycling investment in Wembley from all sources</u> 4- Providing a new pedestrian and cycle bridge over the Metropolitan/Jubilee/Chiltern rail lines near St David's Close to address existing deficiencies 6- <u>Enhance existing</u> <u>Increasing the provision of</u> <u>secure cycle parking and introducing a Cycle Hub within the area.</u> 7- <u>Continue to progress feasibility work on the Western Footbridge</u>
Wembley Stadium (FA Group)	WEM18	Major event related activity We note your overview for the Wembley Stadium operations as a world-renowned centre regularly attracting crowds of up to 90,000 spectators along with other attractions such as Wembley Arena with a capacity of 12,500. We also understand that most spectators travel to events by public transport with all spectators completing the last leg of the journey on foot, and that there is a temporary traffic management plan	We recognise that the attendance at Wembley Stadium and Wembley Arena events provides an important input to the local economy and that the movement of these users needs to be as easy as possible Brent Council will continue to look at options for reducing the scale of pirate parking and accept the disruption that this causes (see new para overleaf). The Wembley Transport Strategy seeks to increase capacity via the

		that is activated on event days along with the partial completion of the stadium axis corridor along the SAC that provides a tidal flow traffic system which is operated to assist vehicular traffic to and from the North Circular Road. There are two main issues that we wish to comment on with regard to draft AAP for Major Event Related Activity and these are: i) policy WEM 18 for stadium coach parking; and, ii) traffic access corridors for the Stadium. <i>Coach Parking and traffic access corridors</i> The draft AAP policy WEM 18 states for Event Related Transport that “in considering the location of new coach parking for Wembley Stadium, any new facility should: • Be within 960m crow fly distance from the centre of the stadium; • Vehicular access and egress from the coach park should not conflict with event day pedestrian access; • Be easily accessible from the NCR; • Be located away from the town centre and be sufficiently large to allow coaches to manoeuvre; and • Be flexible to allow use by cars if required Other measures the Council will seek to implement to improve event day transport are:	Great Central Way / South Way route which will assist highway users accessing stadium events. The transport strategy for Wembley includes a balanced approach to cater for all road users, which will include better provision for public transport users/pedestrians/cyclists along certain routes (notably Wembley Hill Road/Empire Way). The council will work with the stadium to ensure that on event days, the exiting vehicles clear the area as efficiently as possible. Para to be added after 6.20 (see WEM 15): <u>Car parking dedicated for events at the stadium is officially limited to 2,900 spaces. This is down from 7,200 spaces for the old stadium because the aim is to encourage a more sustainable mode of travel to events and reduce congestion on local roads. Unfortunately, pirate contract parking is undermining the objectives of limiting parking. Priorities for vehicular access to the stadium need to balance the use of the area by all vehicles and pedestrians. The Wembley transport strategy identifies priorities for different road users along the approaches into Wembley. Working with key stakeholders, the Council will seek to minimise the negative effect of the use of contract pirate car parking.</u>
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		• Introduce more effective signage for pedestrian and vehicular travel; • Provide an enhance pedestrian environment and introduce high quality public realm improvements without detriment to residents and visitors alike; and, • Provide new crossing facilities, primarily for spectators walking to the stadium, across Wembley Hill Road. We wish to make a combined submission on these Event Related Transport issues that cover the location of our coach parking and the Traffic Access Corridors. With regards to traffic access and egress for our main events the quality of service for our customers, many of whom are our higher paying long-term customers, has been deteriorating since Stadium opening in 2007. This is as a result of: - a reduction in traffic capacity along our alternative egress routes, namely; Wembley Triangle to Harrow Road onto the NCR (which was previously removed from the Stadium transport plan) , and, Bridge Road and Forty Lane onto the NCR; and, - the ongoing and increasing levels of pirate car parking along the single route that you have identified as the stadium axis along the SAC in the draft AAP. We would therefore ask that the draft AAP	We recognise the difficulties in exiting the stadium area by the Stadium's higher paying long term customers. i)The Council would seek to find the optimum balance between car traffic and pedestrians crossing at the Triangle, such that traffic exiting via Harrow Road to the NCR is not unnecessarily hindered. The Council is keen to work with the stadium to identify innovative solutions to the management of pedestrians crossing to reach Wembley Central. This work would include confirming that the demand for this pedestrian route is still as strong as it was before the profile and usage of Wembley Stadium station and Wembley Stadium stations increased to the current level ii) The Council will continue to explore ways of reducing the impact of pirate parking, and work with Wembley Stadium to ensure that this does not unnecessarily
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		incorporates the following additions: • The enforcement measures taken forward by Brent Council to reduce pirate car parking that we have previously referred to; • A change in the priority for Stadium access for cars and coaches that returns to the previous “three corridor strategy” used for the old Stadium and that provided improved reliability and faster egress times; • A priority for the egress of Stadium cars and coaches that completes the overall egress much faster than currently experienced so that the local area can return to normal activities; • An event day traffic management overlay that enables Stadium traffic to egress through Wembley Triangle and along the Harrow Road onto the NCR; • A revised priority for the Western Highway Corridor that retains existing traffic capacity for Stadium egress and re-instates the previous traffic capacity at the roundabout junction of Wembley Hill Road with Empire Way; • Coach parking locations that retain the ability for the Stadium to park up to 2,900 cars with an equal level of convenience as that currently enjoyed and that can provide up to 458 coach parking spaces in	prolong the period during which traffic exits the stadium. We would make the following commitments to Wembley Stadium regarding our joint working, but do not envisage that these need to be included in the plan directly. Those where we envisage a change are underlined (add before policy on p.53) • <u>Efforts will be made by the Council to reduce the impact of pirate car parking</u> • <u>The Council will work with the Stadium to review and develop the current event day traffic management arrangement to optimise traffic flow along the Harrow Road route</u> • The Council has a “three corridor strategy” for routes away from Wembley, but these do place different priorities for different road users, and this balance needs to be retained and so are not in a position to give vehicle access top priority along all three routes • Part of the Wembley transport strategy is to provide improved access along South Way (through restoration of the gyratory to two way working). This will assist with completing the overall egress quicker • The Council is reviewing the traffic capacity between Empire Way and Wembley Stadium, including review of traffic signal phasing and other improvements which do not involve-re-
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		an “open parked” layout to enable independent departure and in line with the current parking agreements between Wembley Stadium and QED. The proposed distance of 960m from the centre of the Stadium that the AAP identifies potentially sits outside this existing agreement and should not be presented in the final version of the AAP.	instating the previous junction layout We envisage that the 960m crow-fly distance covers most of the locations within the industrial land that would be appropriate for coach parking, and therefore consider that the 960m is suitable for defining a distance threshold for the coach parking for stadium events.
TfL	6.40	TfL would like to see the list of potential investors expanded so that funding is solely not dependent upon TfL otherwise TfL would request removal from this list.	Priorities for Investment (para 6.40) should go in new chapter, ensure other funding sources are referred to e.g. <u>LIP</u> , <u>TfL</u> , <u>s106</u> , <u>CIL</u> , <u>London Growth Fund</u>
Quintain	6.40	There is reference to identified priorities and a programme for implementation of improvements in paragraph 6.40, which are critical to the success of the regeneration of Wembley. These should be made explicit for review and comment. They should be set out so that it is clear which are required to address existing deficiencies and which are solely attributable to future anticipated development currently without planning permission.	Work has already been undertaken in earlier studies on the prioritisation of the different schemes in Wembley. The Cumulative Impact Assessment currently underway will help to refine and further develop these scheme priorities. Regarding funding priorities, the section 106 contributions and CIL funding will continue to be a major source of funding. However, opportunities will continue to be pursued regarding public sector funding sources, especially where private sector match funding is available. Clarification has been added to paragraph 6.15 <u>Some of these junction improvements have already been delivered using funding secured through extant planning permissions, as shown on Map 6.1.</u>
Brent Cyclists	6.40	The proposals in the outline map (6.1) are	Points accepted. Drury Way bridge will be removed from

		generally encouraging. We don't however, know what the intended purpose is of the new bridge for cyclists and pedestrians proposed across the Chiltern Line at Drury Way and Great Central Way, and it is not clear to us how this would work or what it could achieve for cycling. Drury Way and Great Central Way currently constitute an extremely unattractive route for cycling, and we believe it would be better to develop an independent route for cycle access to the area from the south, separate from North Circular Road traffic, which we suggest would better be accomplished by a bridge across the Chiltern Line at Sherrans Farm Open Space (see Sustrans Wembley Stadium GOAL study report for Brent, 2007). This would complement the more easterly access via an improved Brent River Path. It would take very significant improvements to Brentfield Road, Drury Way and Great Central Way to make this corridor into a viable cycle route.	the outline map. The proposed pedestrian/cyclist bridge at Drury Way was conceived as part of the Stadium Access Corridor improvement scheme, and was included within the adopted UDP 2004. However, it is clear in light of the Highways and Bridge study 2012 that this bridge provides minimal accessibility benefits, with a particular lack of wider accessibility links. Therefore, it is concluded that this improvement should not be included within the Wembley Area Action Plan
TfL	Omission	All travel Plans that are submitted should be written with regards to TfL's guide for best practice.	TfL provide guidelines for when Travel Plans are required for new development. The council will continue to follow these guidelines and ensure Travel Plans are submitted where required. As this is entrenched with general planning/development policy we will not refer directly to this within the WAAP.

Chapter 7: Housing

Representor	Policy	Comment	Response
Natural England	Chapter 7	Natural England has no substantive comments to make in respect of housing numbers, tenures or mix;	Noted

		however the following may be of use in the Council's determination. Natural England believes that local authorities should consider the provision of natural areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of green-spaces providing for a range of recreational needs, of at least 2 hectares of accessible natural green-space per 1,000 population. This can be broken down by the following system: • No person should live more than 300 metres from their nearest area of natural green-space; • There should be at least one accessible 20 hectare site within 2 kilometres; • There should be one accessible 100 hectares site within 5 kilometres; • There should be one accessible 500 hectares site within 10 kilometres. This is recommended as a starting point for consideration by local authorities and can be used to assist with the identification of local targets and standards. Whilst this may be more difficult for some urban areas/authorities than other, Natural England would encourage local authorities to identify the most appropriate policy and response applicable to their Borough	
Trevor Ellis	Housing	Summary: Long-term stress and frustration suffered due to noisy neighbours and poor quality housing. Councils should be made by law to make sure that the housing they build is adequate enough for people to live in. Until this happens the standard of housing in	We're sorry to hear about your bad experiences with noisy neighbours. We encourage you to continue to contact your housing association about this matter. In planning terms, there are a number of avenues open to us to ensure a high quality of housing, including sound proofing. These are:

		Brent will remain low. We deserve to live in good high quality housing. I have absolutely no faith whatsoever in this new plan for regeneration.	Building regulations: noise nuisance is regarded as a health and safety issue and Part E of the Building Regulations relates to noise control for residential uses. The aim of the regulation is to protect residents from the noise of activities in other rooms or adjoining properties. New homes must meet acoustic standards set out in the Regulations and a sample of dwellings on every new development is tested to ensure this. Code for Sustainable Home: policy CP19 in Brent's Core Strategy (2011) requires new homes in growth areas such as Wembley to achieve a minimum Code level 4, and outside growths areas to achieve level 3. Code for Sustainable Homes includes sound insulation under the 'well-being' category. The Code rewards developers for achieving greater standards of sound insulation than Building Regulations currently require. In terms of size, the Mayor's London Plan (2011) contains internal area space standards for new homes (policy 3.5) which are applied by the council when determining applications. The council has supplementary planning guidance (SPG17) includes size requirements for amenity space (ie gardens and balconies). These regulations and policies are applied to all applications for new housing in the borough.
GLA	WEM 19 7.15-7.16	Government considers that Affordable Rented housing "is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing". The	It is felt that a policy on affordable rent, which is a borough-wide issue, is more appropriately dealt with in the council's forthcoming development management policies document, rather than the Wembley Area

		London Plan and its associated draft Housing SPG recognise this as a matter of fact (though not policy: the NPPF post-dated the Plan). The materiality of this product is in the process of being enhanced by being recognised as a formal policy concern through a Revised Early Minor Alteration (REMA) to the London Plan. Boroughs are therefore strongly advised to incorporate Affordable Rent within their targets for Social Rent to achieve the objectives of the London Plan and the NPPF. In Brent's case this would mean making clear that to ensure general conformity with the London Plan and maximise affordable housing output, Affordable Rent should be considered as part of the 70% of output identified in the Core Strategy as being for Social Rent.	Action Plan. This approach is also fitting given the timing of the London Plan examination and Inspector's report on the matter which would delay the submission of the WAAP. Therefore changes are proposed as follows: 7.12 New Affordable Rent that meets the needs of households eligible for social housing, <u>with eligibility determined with regard to local incomes and local house prices, at a cost low enough for them to afford</u> will be accepted as part of the tenure mix in order to maintain a new supply of affordable housing in Wembley. <u>A policy on Affordable Rent will form part of the borough's Development Management policy document. Introduction of different affordable housing tenures into the Wembley housing mix, for example market sale products, will be considered where demonstrable housing need can be met and viability grounds evidenced.</u> <u>Affordable Rent</u> 7.15 The reduction in capital funding for affordable housing under the Comprehensive Spending Review 2011-15 will significantly curtail the delivery of traditional new build social rented housing at target rents in the short to medium term. In June 2011 a new category of affordable housing was added for planning purposes. 7.16 Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market
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			rent, including service charges. Affordable Rent now forms part of the tenure mix in Wembley in order to maintain a new supply of affordable housing in Wembley in the short to medium term, and support regeneration and growth in the borough. In line with the NPPF and the London Plan, the council will require Affordable Rent housing to meet the needs of households eligible for social housing at a cost low enough for them to afford, determined with regard to local incomes and local house prices. Affordable Rents, inclusive of service charge, will need to be set well below 80% of the local market rents in certain cases in order to meet this affordability requirement, for example, on development of larger family accommodation which will be occupied by households with a greater number of dependents. The council will provide guidance on new Affordable Rent in its Tenancy Strategy. WEM 19 Affordable Rent Affordable Rent subject to rent controls that require a rent of no more than 80% of the local market rent, including service charges, are an appropriate part of the tenure mix in Wembley. Affordable Rent will be required to meet the needs of households eligible for social housing at a cost low enough for them to afford, determined with regard to local incomes and local house prices.
GLA	WEM 19, 20 and supporting	On a number of occasions the document uses words from the PPS 3 definition of affordable housing in reference to the affordable rent product; WEM 19	Proposed changes (see also above): WEM 20

	text 7.12 and 7.16	for example states that “affordable rent will be required to meet the needs of households eligible for social housing at a cost low enough for them to afford, determined with regard to local income and local house prices”. The PPS 3 definition of affordable housing has been replaced by that in the NPPF and the draft Housing SPG devolving form the 2011 Plan strongly advises boroughs to use the latter to ensure conformity with national policy. The Revised Early Minor Alteration to London Plan updates its policy 3.10 so it is in line with the definition in the NPPF. To ensure general conformity with the London Plan and consistency with national planning policy WEM 19, 20 and supporting text 7.12 and 7.16 need to be updated to reflect the NPPF.	Housing Mix The housing mix guidance provided in table 7.12 will be applied in the relevant parts of Wembley. Additionally, new Affordable Rent that meets the needs of households eligible for social housing, <u>with eligibility determined with regard to local incomes and local house prices, at a cost low enough for them to afford</u>, will be accepted as part of the tenure mix. The council will encourage intermediate affordable housing tenures, such as discounted market sale products, where the council can secure future equity payments that can be recycled into new affordable housing.
GLA	WEM 19, 20 and supporting text 7.12 and 7.16	The London Plan seeks to maximise the delivery of affordable housing, and we welcome recognition that “seeking to retain social rent housing at target rent levels as the principle element of the affordable housing within the Wembley housing tenure mixleads to a reduced supply of new affordable housing”. However, attempting to restrict the rent levels to a lower rent than 80% market rent (para 2.16), is likely to have the effect of reducing the supply of affordable housing. For the Affordable Housing programme to deliver a range of housing it requires the flexibility to offer a range of rents, particularly if larger family homes are to be delivered at lower rent levels. The current drafting of WEM 19, 20 and supporting text 7.12 and 7.16, which do not reflect the NPPF’s definition of affordable housing could have the effect of	It is felt that a policy on affordable rent, which is a borough-wide issue, is more appropriately dealt with in the forthcoming development management policies document, rather than the Wembley Area Action Plan. This approach is also fitting given the timing of the London Plan examination and Inspector’s report on the matter which would delay the submission of the WAAP. We are therefore removing the policy on Affordable Rent from the WAAP and proposing the changes set out above.

		wheelchair housing is not considered to be supported housing.	Supported Housing” .
GLA	WEM 24	The document acknowledges the importance of the private rented sector and the role of good quality private build private rented sector units, while this is welcomed and policy WEM 24 reflects many of the recommendations of the Montague report, the policy could constrain the delivery of affordable housing. The council should consider how affordable rent could be used in such schemes to maximise affordable housing delivery while meeting a range of needs.	Noted
Quintain	WEM24 7.33	We welcome the Council’s draft policy on Private Rented Sector (WEM24). We question why the Kelaty House permission has not been included in the analysis of Permissions for Student Accommodation at paragraph 7.33. We would ask that the anticipated increase in population in the Wembley Growth Area is made clear in order to properly comment on the 20% ceiling on student accommodation beds.	Support welcomed. Table will be amended to include the figure for Kelaty House. An estimate of the projected growth in population will be included. This will be based upon the projected growth in the number of housing units in Wembley in the Core strategy, amended to bring it up to date, and an average occupancy of 2.47 persons per unit, as set out in the Infrastructure & Investment Framework.

Chapter 8: Town Centres, Shopping, leisure and Tourism

Representor	Policy	Comment	Response
Carole Spolander	Ch.8	Querying the site of the cinema with view to using public transport - buses have to be accessible to the site, parking has to be reasonably priced	Access to cinema site was considered as part of the decision to grant planning permission. The site has a PTAL rating of 4, which is good. Page 50 of the AAP sets out priorities for bus service improvements which include routing of buses into the heart of the new urban quarter. Management and pricing regime of car parks is not within the remit of the AAP.
GLA	WEM26 8.3	The 30,000 sq.m. of additional floorspace over and above granted planning consent as proposed in paragraph 8.3 is viewed as being ambitious in context of the current economic climate and the strategic pipeline of retail development floorspace proposed (for example at Brent Cross and White City). However Wembley is identified in the London Plan (TableA2.1) as having 'high' potential for growth and it has capacity to accommodate it. Wembley is identified as a Major town centre, with very good public transport accessibility. Adding the proposed amount of space would be consistent with its Major centre status and based on the GLA 2009 Town Centre Health Check baseline this in addition to the Quintain consents, would not tip it into Metropolitan centre scale. The GLA are supportive of Brent's aspirations in principle to accommodate growth in the town centre (as otherwise the growth may end up in	It should be clarified that the 30,000 sq.m of additional floorspace is a level of new floorspace which the Retail Need and Capacity Study (2008) identified as being appropriate for Wembley. This figure was then included in the Core Strategy, adopted in July 2010. Subsequently, planning consent has been granted to QED for approximately this amount of new retail floorspace at Wembley. Para 8.16 clarifies this, stating "since the Core Strategy was adopted in 2010, consent has been granted for a further 30,000 sq m of new floor space on the NW Lands to provide a new shopping street..." It is accepted that any proposed floorspace in addition to this would be subject to an up to date retail study being undertaken. Correction to para 8.3: "A further 30,000 sq m net of new retail floorspace is proposed over and above that granted planning consent up to July 2010 <u>2014</u>." (ie Core Strategy adoption date)

Paul Aldridge (RPS)	WEM26	unsustainable locations as it has done in the past e.g at/around IKEA site). However, this ambitious expansion of Wembley should be backed up by a detailed up-to-date retail study to support and justify the additional 30,000 sq.m. of retail floorspace proposed RPS objects to Policy WEM26 which is considered to be too prescriptive and not consistent with national planning policy guidance. Policy WEM26 states that <i>'New retail, leisure and office development will be directed to the town centre as defined on the Proposals Map. Edge of Centre retail and leisure development will be considered appropriate only when existing town centre sites have been developed or where the proposed use, because of its size, is incapable of being accommodated on an existing town centre site'</i> It is fully acknowledge that new retail development should be focused within town centres wherever possible, and that there is a requirement to adopt a sequential approach to such development. However, there are circumstances where specific retail development is appropriate in out of centre locations provided it meets the national policy requirements. Policy WEM26 as currently worded is too prescriptive and is inconsistent with the policy tests set out in the National Planning Policy Framework.	
			Disagree that policy is inconsistent with NPPF. Policy WEM26 is in line with para 23 of the NPPF which requires local authorities to allocate appropriate sites and set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres. WEM26 also employs the sequential test for town centre uses in para 24 of the NPPF which states main town centre uses should be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. Agree to acknowledge role of existing retail uses in the SIL. New para after 8.8: Strategic Industrial Area <u>The SIL contains established out-of-centre retail uses which provide employment and economic benefits to the local area. Proposals to improve these existing retail facilities will be supported providing they remain local in nature.</u> Changes to WEM26 to clarify different policy areas for town centre and Strategic Cultural Area:

		Section 4 on page 24 concerns Wembley Industrial Estate. Whilst it is acknowledged that the Area Action Plan does not seek to allocate designations or proposals for all the sites within this character area, RPS consider that it should be recognised within the text that the existing retail uses within this character area provide substantial employment benefits. The retail uses are established at this location, and in addition to the valuable employment benefits provided by these operators the wider economic benefits should also be acknowledged. Indeed, policy WEM26 should also recognise that the existing out of centre retail uses within the Wembley Industrial Estates character area provide substantial employment and economic benefits, and that proposals to improve these existing retail facilities should be supported to ensure these uses continue to be able to offer the valuable employment and economic benefits to the local area.	New retail, leisure and office development New retail, leisure and office development will be directed to the town centre as defined on the Proposals Map. Edge of centre retail and leisure development will be considered appropriate only when existing town centre sites have been developed or where the proposed use, because of its size, is incapable of being accommodated on an existing town centre site. <u>Outside of the town centre, ancillary retail function as part of a major leisure, tourism or cultural use may be acceptable in the Strategic Cultural Area.</u> Large foodstores (over 2,000 sq m gross) will be directed to sites within or adjoining Wembley High Road. <u>Improvements to existing local retail uses in the SIL are supported.</u> Shops (Use class A1) will not generally be appropriate on the eastern side of Olympic Way.
Quintain	Map 8.1	We welcome the annotation showing the extension of the Town Centre Boundary to include the NW Lands as shown on Map 8.1.	Support welcomed.
Quintain	WEM26 8.10	In relation to WEM26 we object to the proposal for additional large foodstores exceeding 2,000 sqm gross to be directed to sites within the High Road given that the town centre now extends through the Comprehensive Development Area where the majority of the Borough's new growth will arise. It should also be clarified that there are existing	Para 8.9 refers to the Brent Retail Needs and Capacity Study (2008) which identifies the requirement for convenience floorspace set out in para 8.10. The Plan retains a preference for a new large foodstore to be located on the High Road even though it is proposed to extend the town centre designation

		permissions for convenience retail within the Comprehensive Development Area, which are anticipated to come forward. Justification for the statement within paragraph 8.10 is also sought before full comment can be made.	throughout the area. The council wishes to continue to ensure that regeneration continues to benefit the whole of the area and that regeneration of part should not lead to decline of another part. The existing permissions which allow for a large unit to be occupied potentially by a supermarket operator was granted as an exception to normal policy for particular reasons, and specific conditions were applied to the consent. These particular reasons may not apply to future proposals. The Plan states that there are outstanding consents for a further 30,000 sq m of new floorspace on the NW Lands.
Quintain	WEM27 Map 8.1	We are concerned about the identification of the Stage 1 Lands eastern element as a location for a major leisure, tourist and cultural use as shown on Map 8.1. The 'eastern lands' on the Stage 1 Development Area have outline permission for mixed use regeneration, including aparthotel, office, residential and close care. Given the ambitions for W28 to provide a transition between the mixed uses around the Stadium and the industrial estate to the east, including residential, we ask that WEM27 is amended to clearly identify that a major leisure attractor could come forward as part of a mixed use development, including residential. This would be in line with the ambition set out in paragraph 4.31, which anticipates that land east of Olympic Way will have a more residential character focussed around a newly created park. We ask that the second sentence to WEM27 is amended as follows: <i>"...to the east of Olympic Way, including as part of mixed use development, as shown on the Proposals Map."</i>	Agree. Identify Strategic Cultural Area on new strategic map at beginning of AAP. Changes to 8.17: Wembley has long been a focal point for leisure, tourism and cultural uses and is identified in the London Plan as a Strategic Cultural Area where this type of development is encouraged. <u>These include sports and leisure provision, tourist and visitor attractors, hotels and conference facilities.</u> Often these uses are of a scale, and consequently have a level of impact, which <u>is</u> <u>may not be</u> conducive to a traditional town centre location. However, land to the east of the area, including the current stadium car park, for example, is capable of accommodating such uses and <u>as such is designated as Wembley Strategic Cultural Area.</u> Development in this area can also help create a buffer against the impact from waste operations and other 'bad neighbour' uses to the east.

Theatres Trust	WEM 27 and WEM 31	We are pleased that the document is aware that leisure, tourism and cultural uses are vital for the vitality and viability of town centres. We particularly support Policies WEM 27, WEM 30 and WEM 31, but wish to point out that there are differences between community facilities and cultural facilities. We suggest Policies WEM 27 and WEM 31 should not overlap and a better distinction made between them. Museums, art galleries and places of worship are not strictly speaking 'community facilities', but belong within the 'family' of cultural facilities as they are not absolutely necessary for the health and well-being of residents. In our opinion, community facilities tend not to be leisure orientated, but are	Changes to WEM27: Leisure, Tourism and Cultural uses <u>Strategic Cultural Area</u> Major leisure, tourism, and cultural uses are encouraged within the <u>Strategic Cultural Area</u> area shown on Map X. Major leisure, tourism and cultural development is appropriately located on sites to the east of Olympic Way as shown on the Proposals Map. Leisure, tourism, and cultural uses can form part of a mixed use scheme, including office and residential, where appropriate. Significant improvements to public transport will be required where development will attract a large number of trips. See also changes to W19 to recognise existing consent.
			Suggested change to 9.14: ...The council will however support the provision of community and religious groups bringing forward its own community facilities provision in <u>accessible locations</u>. WEM31.5 is contrary to London Plan policy 3.16 and Core Strategy para 5.98 which requires social infrastructure (including community and cultural facilities) to be in accessible locations. Not all of the AAP area is therefore suitable for community facilities. Suggested change to WEM31.5: 5. Support the provision of community facilities <u>social infrastructure</u> including religious, community and cultural provision in <u>locations accessible to all sections</u>

		provided for the more fundamental resources of healthcare, educational establishments and community centres. It is important that a distinction is made so that even if you don't agree with our understanding of these terms it is important that your interpretation is understood in the context of your policies so that planning applications are assessed against a solid policy framework.	of the community and within easy reach by walking, cycling and public transport <u>within the AAP area</u>; and Suggested changes to 8.17: Wembley has long been a focal point for leisure, tourism and cultural uses and is identified in the London Plan as a <u>Strategic Cultural Area</u> where <u>this type of development is encouraged</u>. These include <u>sports and leisure provision</u>, <u>tourist and visitor attractions</u>, <u>hotels and conference facilities</u>. Often these uses are of a scale, and consequently have a level of impact, which <u>is may not be</u> conducive to a traditional town centre location. However, land to the east of the area, including the current stadium car park, for example, is capable of accommodating such uses. Development in this area can also help create a buffer against the impact from waste operations and other 'bad neighbour' uses to the east.
Quintain	WEM28	In relation to WEM28 we object to the restriction that no more than 7% of Use Class A5 should be incorporated within a single parade. Each parade should be considered on its merits, having regard to role and impact.	Show Strategic Cultural Area on strategic map. Policy WEM28 is supported by evidence base document Takeaways in Wembley (August 2012). Additional support for a policy restricting the number of takeaways comes from the GLA's Takeaway Toolkit (November 2012). Takeaways have both a positive and negative influence. They contribute to the local economy and provide jobs; however fast food can have an adverse impact, for example on the health of the population. One of the key recommendations of the Takeaway Toolkit is that local authorities adopt clear planning

		policies that enable them to restrict the opening of new takeaways in areas where there is a high concentration of fast food outlets, or where vulnerable groups such as children and young people are a concern. Policy WEM28, as well as policies in the forthcoming development management policies document, will help do this. The council has taken a measured approach to takeaways in Wembley. 6.2% of the shops in Wembley are takeaways (A5 use class). The chosen option (limit of 7% in a single length of primary/secondary frontages) is considered to provide a balance between allowing an increase in A5 uses whilst limiting the potential adverse impacts, especially on health. Hot food takeaways are directed towards town centres. Policy WEM28 aims to avoid over-concentration of A5 uses within Wembley town centre. The policy provides a degree of differentiation between primary/secondary frontages and the area outside this. It is not considered appropriate or proportionate to drill down further than this. Suggested change to 8.18 to acknowledge role of takeaways in the local economy: Wembley has a large number of takeaways and fast food outlets, partly as a result of demand generated by those attending events at the Stadium and Arena. <u>While takeaways can make a positive contribution to the local economy and community, there is evidence that large</u>
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QARA				concentrations of fast-food takeaways contribute to unhealthy lifestyles...
	WEM28		Delete existing para. and replace with one offering much better diction!	Changes to WEM28: Hot Food Takeaways (A5 Uses) In recognition of the specialist role that the town centres in Wembley have in meeting the needs of visitors to the area, outside of primary and secondary frontages applications for new A5 uses will be considered on their merits. There will be a limit of 7% on the proportion of <u>units in A5 use</u> in any single length of primary or secondary frontage of Wembley / Wembley Park town centres. No further A5 uses will be permitted within 400 metres of a school entrance/exit point.
QARA	8.19		This paragraph reads but as “wish list”; on what current and future factual basis are these mere “wish list” comments being made!	The paragraph recognises that there is potential to host major conferences by making use of existing and potential new facilities in the future. This is also recognised by developers, owners and operators locally.
Quintain	WEM29		We welcome and support the ‘<i>agglomeration</i>’ of conferencing uses in the Regeneration Area comprising facilities within the Stadium, the Arena, the Hilton Hotel and other hotels in the area, together with the Civic Centre and request that this delivery across a number of different properties is made clear in WEM29 through the following alteration to the first sentence: <i>“The development of new conferencing facilities is promoted in Wembley, either purpose-built or as part of major mixed-use development.”</i>	Suggested change to WEM29: Conferencing facilities - The development of new conferencing facilities <u>within existing or new buildings</u> is promoted in Wembley, either purpose-built or as part of major mixed-use development.
QARA	WEM30		Include “industrial / technical training, mentoring	Proposed change to WEM30 in recognition that not just

		and practice centres”.	creative uses can make use of vacant sites or buildings: Temporary Creative Uses The use of vacant sites or buildings will be promoted for occupation by temporary creative-uses, especially creative industries that will benefit Wembley’s retail, leisure, tourism and creative offer.
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Chapter 9: Social Infrastructure

Representor	Policy	Comment	Response
MOPAC/MPS	Chapter 9	The MOPAC/MPS generally support the Social Infrastructure section of Chapter 9 which recognises that additional and enhanced social infrastructure will be needed to support the anticipated growth in the area. However, it is recommended that an additional paragraph is included under the heading ‘emergency services’ in order to ensure that the impact of new development upon the policing in the Wembley area can be appropriately mitigated. The MOPAC/MPS recommend that the following paragraph is included within Chapter 9 after Emergency Services 9.12 The scale of development within the proposed Intensification Area will require enhancements to neighbourhood policing facilities. In order to ensure that the Wembley area remains a safe and secure place for residents and visitors, it is important that the diverse nature of policing needs as a result of development and intensification can be met. The London Borough of Brent will therefore work	Accepted. Insert new paragraph after 9.12 as follows: “The scale of development within the Wembley Growth Area will require enhancements to neighbourhood policing facilities. In order to ensure that the Wembley area remains a safe and secure place for residents and visitors, it is important that the diverse nature of policing needs as a result of development and intensification can be met. The London Borough of Brent will, therefore, work alongside the Mayor’s Office for Policing and Crime and Metropolitan Police Service to ensure the delivery of necessary policing facilities in Wembley so that the impact of new development upon policing can be mitigated.

		alongside the Mayor's Office for Policing and Crime and Metropolitan Police Service to ensure the delivery of necessary policing facilities in Wembley so that the impact of new development upon policing can be mitigated.	
Carole Spolander	Chapter 9	More police on patrol would be required - inadequate at the moment.	It is proposed that an additional paragraph be added in recognition of the need to mitigate the impact of new development on policing. The issue of police on patrol is an operational matter for the police service.
TfL	Chapter 9	AAP needs to take into account future money raised by Community Infrastructure Levy (CIL) and where the funding might go. When referencing the Community Infrastructure Levy (CIL) it would be helpful to also refer to the Mayor's CIL.	Add new paragraph after 9.8 as follows: S106 funding has made, and continues to make, a significant contribution to the infrastructure requirements of development in Wembley. Funding of infrastructure will shortly be replaced in the main by Community Infrastructure Levy (CIL) contributions from development in the area. A proportion of CIL collected (£35 per sq m) also contributes towards the Mayor's funding of Crossrail.

Chapter 10: Response to climate change

Representor	Policy	Comment	Response
Natural England	Chapter 10	The council should consider the role of the natural environment under this section, together with energy efficiencies. As discussed above, incorporating the natural environment into the built environment can significantly contribute to climate change adaptation including through flood storage, reducing rainwater runoff and ameliorating the urban heat island effect. We recommend that the role the natural environment can play in climate	The Open Space, Sports and Wildlife Chapter now includes a cross reference on climate change: 11.1 There is a lack of open space in Wembley and access to existing open spaces is limited. <u>Biodiversity and the natural environment can lead to opportunities, not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality of life.</u> The strategic policies set out in the London Plan

Brent Campaign Against Climate Change	Chapter 10	change adaptation is drawn out further in the Draft Plan, and policies cross referenced where possible to reflect this. 1. We welcome the inclusion of a response to Climate Change in the report and note this statement from the Wembley Plan: 10.6 Climate change will have a significant impact on the economic, social and environmental well being of Wembley. Hotter summers will have a bigger impact in Wembley because of the predominance of concrete and buildings. Heat waves will mean more people are likely to suffer from illnesses and could also lead to damage to roads, railways and buildings. Heavy thunderstorms and intense winter downpours will become more common, and will lead to flash flooding where the drainage system cannot cope with the increased rainfall. It is therefore crucial that future development in Wembley addresses these impacts and limits its contribution to climate change by minimising carbon emissions. 10.7 Specific issues for Wembley include the legacy of industrial use in the area which led to a lack of green and 'cool' spaces. Much of Wembley is deficient in open space and there are few mature trees. Land adjacent to the Wealdstone Brook is most at risk of flooding, although much of Wembley is also prone to surface water flooding. In addition, the majority of the sewer network in the Wembley area is undersized. 2. We welcome the recognition of the importance of this issue and that fact that it is being addressed in detail by the Council. We welcome the proposals on naturalising of the Wealdstone Brook, flood plain	support the protection of local open space...
			Support welcomed.

Brent Campaign Against Climate Change	WEM32 WEM33	storage, tree planting, green roofs and creation of new parks are all welcomed as responses to this situation. Climate Change Mitigation: 1. Under this heading the Council make a number of proposals for Decentralised (CHP) Combined Heat and Power facilities and for Energy from Waste over which we have reservations. 2. The reservations below regarding CHP are pertinent: and should inform the Council's plans: (From www.arthurshumway.smith.com) "Combined Heat and Power" (CHP) or "cogeneration" systems for producing both heat and electric power are generally mature and really can reduce emissions of CO2 compared to other fossil-fuel technologies. But there are two problems with typical discussion of CHP: (1) Fossil-fuel-based CHP cannot be a long-term solution on climate or energy because they still burn fossil fuels, and therefore still emit a lot of CO2. Reducing that by 20% or even 50% is not enough; we need to take steps that over the next 30-40 years will bring fossil CO2 emissions close to 0. (2) Efficiency claims for CHP systems are frequently greatly overstated. Heat is lower-quality energy than electricity, and only at high temperatures does it become close to comparable. Efficiency claims for CHP systems that use high-temperature heat are not so far off, but CHP systems that make use of low-temperature waste heat have much lower thermodynamic efficiencies than usually claimed. The inflated efficiency claims often lead to assertions that CHP is the "largest" or one of the largest	Disagree (1) & (2) (1) The policy does not imply that the CHP should only be run by fossil fuels. Once the district heating pipes are in place, only the CHP engine needs to be replaced/upgraded when changing heat supply technology such as renewables. Connection to existing buildings could also be possible that would reduce carbon emissions to those buildings requiring boiler replacements. (2) Even if the CHP needs to be run by fossil fuels at the beginning; it would still emit lower CO₂ than individual gas/electric boilers. (3) Concern noted. Add sentence to 10.9 to emphasise the waste hierarchy that "reduce" is the first priority: "The EU Waste Framework Directive...followed by preparing for re-use, recycling, other recovery and disposal, in descending order of environmental preference. <u>Brent will continue to support initiatives to reduce waste generated.</u> CP19 of Brent Core Strategy requires major proposals to <u>submit a Sustainability Statement that include the indication of reusing recycled aggregates and construction materials.</u> Good progress is being made to recycle more in Brent; however, there is still some left over waste, known as 'residual waste', which cannot be recycled..." Policy WEM 33 does not imply that residual waste would be the only fuel source to power the decentralised energy system. There could be two CHP engines co-existing and
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		potential solutions. But the number of applications that require high-temperature heat where CHP efficiency really is quite high are limited. And the modest efficiency gains with low-temperature waste heat use, which could be much more widely applied, don't lead to very much improvement in overall energy use. The combining of heat and power production in CHP systems can reduce our fossil CO2 emissions by a few percent, but much more than that is needed in coming decades. 3. The Wembley Plan (WEM 33) supports Energy from Waste and again we have reservations. 3.i The first issue is that the emphasis should be on the reduction of waste at source in manufacturing, then re-use and recycling. There is a danger that in using residual waste as fuel in order to reduce landfill, the incentive to reduce waste is removed. Furthermore, dependence on waste as fuel to generate heat and power, can lead to the need to import fuel in order to keep the processes going. The NABU Study (2010) in Germany illustrates this: The study shows that in 2010, somewhat less domestic waste will be produced in Germany than at present.. This is due to a decline in the population and a slight increase in recycling. Overcapacities with incinerators are already occurring. This applies to combustible material used in energy from waste plants as well as conventional incineration At this point in time, 2 million more tonnes of waste are imported into Germany than exported. This is equivalent to a goods train 1000 km in length. Germany is therefore a net importer of waste We would not want Brent to become an importer of	powered by different types of fuels. There is no intention to encourage any import of residual waste from elsewhere, the emphasis is on self-sufficiency and "waste generated locally" A Wembley Energy Master Plan has been commissioned that appropriate energy from waste technologies will be examined. The study will form the evidence base for the WAAP.
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		waste in order to fuel our EfW plants. 3.ii Secondly, the Plan states 'There are a number of new and emerging technologies that are able to produce energy from waste without direct combustion'. Our reservation on this is that in some technologies the initial stages do not involve combustion but further stages involve, for example, gases being burned off.. We cannot pretend to be expert on these issues but urge that complete transparency, independent expert advice (rather than assurances from the companies involved) and public debate must take place before any such technologies are employed. 3.ii In investigating the detrimental impact on human health the Council must take into account the concerns that exist over nanoparticles produced in the incineration process and the emerging science discipline of nanopathology that studies the impact of such particles on the human body.	
Environment Agency	WEM 33 Energy from Waste	We made comments at the issues and options stage which favoured a balanced policy that aimed to reduce the amount of waste through recycling and also supporting the recovery of energy from residual waste thus reducing the amount that goes to landfill. We note your comments in paragraph 10.9 about good progress being made to recycle more and therefore your focus is on dealing with the residual waste. We think the policy could be strengthened by encouraging proposed developments to reuse recycled aggregates and construction materials on site and ensuring space for facilities to recycle domestic waste are provided for housing and commercial developments.	Concern noted. Add sentence to 10.9: <u>"The EU Waste Framework Directive...followed by preparing for re-use, recycling, other recovery and disposal, in descending order of environmental preference. Brent will continue to support initiatives to reduce waste generated. CP19 of Brent Core Strategy requires major proposals to submit a Sustainability Statement that include the indication of reusing recycled aggregates and construction materials.</u> Good progress is being made to recycle more in Brent; however, there is still some left over waste, known as 'residual waste', which cannot be recycled..."

Environment Agency	WEM 34 Urban Greening	We support this policy that requires green roofs, green walls and landscaping as part of development proposals. This accords with London Plan Policy 5.10 and paragraph 99 of the National Planning Policy Framework which recognizes the value of green infrastructure to adapt to climate change impacts. We support the recognition in paragraph 10.10 that this urban greening will have multiple benefits in terms of social, health, providing amenity space, reducing flooding and increasing biodiversity. The policy could be improved by recognizing the importance of connectivity between green spaces. Additional wording could be added as follows: Wherever possible, opportunities to connect new green spaces to existing green spaces should be maximized to help create green infrastructure. Encouraging green infrastructure through redevelopment will help to improve the ecological connectivity between sites for the benefit of local wildlife.	Support welcomed. Suggestion agreed. Add sentence to end of 10.10: <u>Encouraging green infrastructure through redevelopment will help to improve the ecological connectivity between sites for the benefit of local wildlife.</u> Suggested change to WEM34: Development proposals must incorporate urban greening measures such as green roofs, green walls, trees and soft landscaping. <u>Wherever possible, opportunities to connect new green spaces to existing green spaces should be maximized to help create green infrastructure. Where site constraints limit the level of urban greening that can be provided on site...</u>
Natural England	WEM 34 Urban Greening	WEM 34 Urban Green refers to a variety of Green Infrastructure Measures which is welcomed and encouraged and can be linked to other Chapters of the Plan, helping to strengthen the document further.	Support welcomed. There has been progress towards the increase of green spaces in Wembley. Supporting text 11.6 and 11.7 and policy WEM36 highlight the policy context on open space provision.
Environment Agency	WEM 35 Flood Risk	We support some elements of this policy; however, we think this should be improved in terms of the strategic approach to flood risk. We welcome the references to your Strategic Flood Risk Assessment level 1 and the Surface Water Management Plan (SWMP). We also welcome the requirements for applying the sequential approach to the layout of sites and the requirements for Flood Risk	Support welcomed. Brent has carried out an assessment which applies the sequential and, where appropriate, exception test for sites in Flood Zones 2 and 3a and 3b. The assessment also considers policy recommendations from Brent's Strategic Flood Risk Assessment and Surface Water Management Plan.

		Assessments and SUDs. With regard to sequential test your policy requires that each proposal that falls within Flood Risk Zones 3a and 2 will be required to pass the Sequential Test, and where the site is affected by 3a, the Exceptions Test must be applied. Paragraph 100 of the NPPF states: Local Plans should apply a sequential, risk based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by: • applying the Sequential Test; • if necessary applying the Exceptions Test; • safeguarding land from development that is required for current and future flood management; • using opportunities offered by new development to reduce the causes and impacts of flooding; and • where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations. We recommend that strategic decisions about the sequential test and exceptions test for this plan are not left to the development management process. We object to major planning proposals that are submitted without the submission of sequential test evidence, though this requirement is lifted where the decision has already been made at a strategic level. We will only accept sequential test evidence from the Local Authority and in our experience development management teams can struggle to
Suggested changes to WEM35 and supporting text: Flooding 10.11 There are two <u>main</u> types of floods in the area, one is associated with the <u>river</u> when the actual amount of river flow is larger than the amount that the channel can hold, and river will overflow its banks and flood the areas alongside the river. Land adjacent to the Wealdstone Brook is the area at risk of flooding. The map shows the areas at risk of flooding. Brent seeks to ensure that all new development in flood risk areas is appropriately flood resilient and resistant and that any residual risk can be safely managed. 10.12 As required by the National Planning Framework, <u>the council has undertaken a sequential approach should be used in areas known to be for sites at risk from any form of flooding including fluvial and surface water flooding. Planning recommendations are provided for sites at risk of flooding in the Site Proposals chapters. Inappropriate The council has a proactive approach to risk reduction when considering the suitability of sites for future development in the Wembley Area Action Plan, in line with the recommendations of the SFRA. New development in areas at risk of flooding <u>will be required to apply a site-level sequential test to ensure should be avoided by directing development is steered away from areas at highest risk and located in line with the NPPF flood risk vulnerability classification but where development is necessary, making it safe without increasing flood risk elsewhere.</u></u> 10.13 In most of the urban area, roads and land are usually impermeable which can lead to surface water flooding. Much		

	provide this evidence needing support from the Planning Policy teams. Tables 1-33 (pages 3-8) of the Technical Guide to the NPPF are useful in outlining the appropriate uses and policy aims for each flood zone and where the Exceptions Test should be applied (as the Exceptions Test in zone 3a is not applicable to all types of development). This information can be used by Local Authorities to plan what uses are appropriate and will be accepted by them if proposed in a flood zone area. You applied the sequential test to your Site Allocations DPD producing a standalone document. This plan also allocates sites within flood zones 2 and 3 (W13, W14, W16, W21, W22, W25, W26 and W27). You need to demonstrate that you have applied the sequential test to these sites and what land uses will be deemed appropriate in these areas which should then inform this policy. You have areas of functional floodplain (flood zone 3b) which are fairly well confined to the river channel and corridor areas of the Brent and Wealdstone Brook as shown on your Map 10.1 on page 78. Your draft policy recommends that a Flood Risk Assessment is submitted for these areas. However, it is worthwhile consulting your SFRA to see what the policy recommendations are for zone 3b. With the area of 3b being narrowly confined to the river channels it should be straightforward to avoid development in this zone altogether and protect its function as a flood storage area. Where redevelopments are proposed on existing footprint, options should be sought to relocate the development outside 3b thus restoring this land to the floodplain.	of Wembley is prone to surface water flooding. The Flood and Water Management Act 2010 requires local authorities across England and Wales to develop, maintain, apply and monitor a Brent's Surface Water Management Plan (SWMP) provides a strategy for local flood risk management in the borough. their areas. <u>Brent Surface Water Management Plan (BSWAMP)</u>, which contains the <u>Preliminary Flood Risk Assessment and a Flood Risk Management Plan</u>. The document identifies and designates a Critical Drainage Area (CDA) for the Wembley Stadium area which has several areas of surface water flooding affecting property and critical infrastructure. <u>Three WAAP sites fall into a Local Flood Risk Zone (LFRZ). aims to help manage and reduce surface water flood risk in Brent.</u> 10.14 The Act also introduces the requirements for developers are required to construct include sustainable urban drainage systems (SUDS) in their schemes. <u>The SWMP identifies specific SUDS measures for the Wembley Stadium CDA to relieve pressures on the drainage system, reduce flood risk and the demand for fresh water. These include rainwater harvesting and grey water recycling, can help relieve pressures on the drainage system, it can reduce flood risk and the demand for fresh water. SUDS such as green roofs, filter strips and swales, storm water storage tanks, permeable and porous pavements, re-profiling of ground levels, basins, ponds, reed beds can help reduce the volume and speed of water flowing into drains and eliminate surface water flooding. BSWAMP favours the application of SUDS. Measures to alleviate surface water flooding through SUDS will be required as part of the development of sites W3-W4, W6-W20 and W25-W29. Specific SUDS requirements for sites in the LFRZ are set out in the appropriate Site Proposals.</u>
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		We think this policy could be improved by including flood risk requirements that are specific to this area using the recommendations in the SFRA and SWMP, in addition to the no net loss of floodplain storage or increase in maximum flood levels. Local Flood Risk Zones (LFRZ) are identified within the Wembley Area Action Plan boundary. LFRZ's are defined as the actual spatial extent of predicted flooding in a single location. For the specific LFRZs are there specific measures that would help alleviate the surface water flooding that could be included as policy criteria? Although it is welcome that the policy requires that all major proposals will be required to apply SuDs, its worth considering whether this standard should be applied to all sites and what type of SuDs should be maximized on these sites. . London Plan Policy 5.13 requires developments to aim to achieve Greenfield runoff rates through the application of SuDs and refers to the drainage hierarchy. Policy 5.13 also states: LDF preparation B Within LDFs boroughs should, in line with the Flood and Water Management Act 2010, utilise Surface Water Management Plans to identify areas where there are particular surface water management issues and develop actions and policy approaches aimed at reducing these risks. Although a reference to the SWMP is included, it is worthwhile considering if more specific measures or standards should be included for the Wembley area.	10.15 In addition, Most of the sewer network in the Wembley area is undersized. Careful consideration must be given to issues of sewer flooding, both on and off site, as a result of new development. Developers may be required to carry out studies to ascertain whether proposed development will lead to overloading of the existing sewer infrastructure. <u>10.16 Specific flood risk reduction measures and Flood Risk Assessment requirements are set out for each site proposal (chapters 12-16). This includes recommendations from the SFRA, SWMP and site-specific sequential considerations. From 2013 all new developments will be required to submit information to Brent's SUDS Approval Board (SAB) which has a duty to ensure that all new developments have incorporated SUDS to deal with the surface water run off from the development.</u> WEM35: Flood Risk <u>All proposed development in Flood Zones 2 and 3 will require a detailed Flood Risk Assessment (FRA), in accordance with Section 6.7 of Brent's Strategic Flood Risk Assessment.</u> <u>Applications will be assessed against the site-specific flood risk mitigation requirements set out for individual Site Proposals.</u> <u>Development is not suitable in Flood Zone 3b.</u> <u>Application of a site-level sequential approach will be expected to locate development towards areas of lowest risk within the site. More vulnerable development will not usually be appropriate in Flood Zone 3a. Where it is proposed in exceptional circumstances, an Exception Test will be required.</u>
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	Proposals within Flood Risk Zones 3a (High Probability and Climate Change) and 2 (Medium Probability) will be required to pass the Sequential Test, and where a site is affected by Flood Zone 3a, the Exception Test must be applied. Proposals will need to demonstrate how flood risk is reduced by sequential layout of the site and form of development. All proposals for development in Flood Zones 2 and 3a&b will require a full Flood Risk Assessment (FRA). Proposals in Flood Zone 1 which are over 1 hectare in size will also require a site specific FRA. Development proposals in the area above must demonstrate that there will be no net loss in floodplain storage nor an increase in maximum flood levels, within adjoining properties as recommended by Brent's Strategic Flood Risk Assessment Report Level 1 (2007). <u>Developments will be required to implement SUDS to ensure that runoff from the site (post redevelopment) does not exceed Greenfield runoff rates. In order to reduce surface water flood risk in the area, all major proposals will be required to apply SUDS in accordance with Brent Surface Water Management Plan.</u> <u>Developers will also be required to demonstrate whether there is sufficient capacity both on and off site in the foul sewer network to support development. Where insufficient capacity exists developers will be required to identify how any necessary upgrades will be delivered ahead of the occupation of development.</u> See also changes to individual Site Proposals.

Thames Water PLC	WEM 35 Flood Risk	It is recommended that policy WEM 35 Flood Risk is expanded to incorporate flooding from all sources including foul sewers. It is suggested that the following text is added to Policy WEM35: “Developers will be required to demonstrate whether there is sufficient capacity both on and off site in the foul sewer network to support development. Where insufficient capacity exists developers will be required to identify how any necessary upgrades will be delivered ahead of the occupation of development.”	Agreed. Suggested change to 10.11: There are two <u>main</u> types of floods in the area... Suggested addition to WEM35: <u>Developers will also be required to demonstrate whether there is sufficient capacity both on and off site in the foul sewer network to support development. Where insufficient capacity exists developers will be required to identify how any necessary upgrades will be delivered ahead of the occupation of development.”</u>
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Chapter 11: Open Space, Sports & Wildlife

Representor	Policy	Comment	Response
Natural England	Ch.11	WEM 36 – Open Space Provision. WEM 37 – Open Space Improvements WEM 41 – Access to Nature WEM 42 - River Brent and Wealdstone Brook Natural England welcomes the provision of new parks and open spaces, along with potential to “naturalise” the River Brent. Also welcomed and supported are opportunities to enhance ecology and biodiversity of the area, providing links to and between green/open spaces for people as well as wildlife. The use of the existing natural signature of the borough can be used to help deliver this and other	Support welcomed. Add sentence to WEM42 supporting text: <u>11.21 The London Rivers Action Plan includes restoration projects for the Wealdstone Brook and River Brent. Two of these projects are within Wembley and any improvements to the rivers should be in line with this plan and the Brent River Valley chapter of Natural England’s publication London’s Natural Signatures.</u> Add Natural England’s ‘London’s Natural Signatures’ report - Brent River Valley chapter – to supporting evidence.

		environmental objectives. Natural signature refers to the underlying landscape of an area, which if drawn out, can make a direct and powerful contribution to 'sense of place' and local distinctiveness. Natural England has recently produced the London Landscape Framework which gives further guidance on the 'natural signatures'. We recommend you consider this document as a means of helping the Council achieve its aspirations. The London Landscape Framework can be found at: http://www.naturalengland.org.uk/regions/london/ourwork/londonnaturalsignatures.aspx Sustainable transport options such as walking and cycling are welcomed and can be used to form green chains/links, increasing access, overcoming fragmentation as well as providing ecological/wildlife corridors. Natural England will comment on individual applications/sites as they are brought forward.	
LBB	11.1	Update	Change to 11.1: ... Brent has one of the worst participation rates in England for sport and physical activity (Sport England's Active People Survey 2011-12 2005-6). ...
Quintain	WEM36	WEM36 sets out a specific requirement in relation to the orientation of the park on Wembley Retail Park. This is a matter of detail for merit based consideration in due course. We ask that WEM36 is	The location and orientation of the park were established in the Fosters plan for the area and incorporated into the councils 2004 Wembley Masterplan. As well as the reintroduction of the formal historic urban form established in

		amended so that the first two sentences state: <i>“The council will require a new public open space of around 1.2 ha with frontage to Engineers Way. The new space will provide for a range of sporting activities and play facilities.”</i> In relation to this, we support the acknowledgement of a building plot at the junction of Olympic Way and Engineers Way within W17 as it will provide enclosure for Olympic Way, set out as lacking in paragraph 4.6.	the Empire Exhibition as a counterbalance to the strong north-south route of Olympic Way, the orientation of the park was considered to be a fundamental element in establishing an ‘east-west’ grid (Wembley Masterplan, 2004 p23) . The layout of the new park was comprehensively analysed as part of the production of the 2009 Wembley Masterplan. Following the assessment of a number of options, the east-west orientation was considered to provide the most beneficial outcome in terms of maximising sunlight into the space whilst creating the vital physical connection between the centre of the masterplan area and the localities to the east. Given the fact that permission has been granted for a significant development on the site of Kelaty House based on this layout, as well as the likely future occupation of one of the eastern sites as a primary school, the council believes that the justification for orientating the park east-west remains an important requirement of this document.
Maddox Associates on behalf of Solum Regeneration	WEM36	Solum Regeneration accepts the need for further open space in the Wembley area. The proposals submitted by my client, seeks to provide one of the pocket parks referred to in the plan. However, this can only be achieved as part of a package of development opportunities that are referred to in detail in the submission.	Noted. The provision of a 0.4 Ha park in this locality is supported. However, it is understood that this site is outside of the ownership and control of Solum Regeneration. Additionally, this does not overcome the issues raised previously.
Quintain	Map 11.2	We would be pleased to see the open space as permitted in outline on the NW Lands shown on Map 11.2. In addition, there is an area of open space to be delivered to the east of the Stadium within the Stage 1 Development Area. This space is referred to as First Square and should be shown on Map 11.2 to give a true indication of the open space secured in the Comprehensive Development Area through extant planning permissions.	Agree. Add First Square to map 11.21.

Quintain	WEM36 and WEM38 set out requirements that major new development provides new open space and food growing facilities. Such exceptional provision, which also includes the provision of play space in WEM40 and wildlife enhancements in WEM41, will have an impact on viability and thus will have an impact on Section 106 obligations, after CIL. We consider that this should be stated in the document.	WEM36 and WEM38	Additional section on investment priorities including viability to be included in new strategic chapter: <u>Priorities for Investment</u> may change <u>Priorities for infrastructure investment in the Wembley Growth Area include open space, play facilities, accessibility and cycling routes, wildlife enhancements, health, schools and community facilities. These are set out in the council's Infrastructure and Investment Framework (IIF). This document is subject to regular review.</u> <u>The AAP also sets out priorities for developer contributions, appropriate to the scale of the proposed development. Essential requirements include flood mitigation, transport improvements and affordable housing. Developers will also be encouraged to provide low-cost business start-ups, public realm improvements, public art, and connection to a decentralised energy system.</u> <u>Delivery of these investment priorities is dependent on resources and viability. Infrastructure will be delivered through the Community Infrastructure Levy and the IIF includes opportunities for funding sources to complement developer contributions. The council will work closely with delivery partners such as developers, Greater London Authority and Transport for London.</u>
Quintain	We are pleased to see that the Arena Square fountains are acknowledged as informal play space in paragraph 11.13.	11.13	Support welcomed
Environment Agency	We support this policy particularly the reference to 'Semi-naturalization of the Wealdstone Brook.'	WEM37	Support welcomed

Maddox Associates on behalf of Solum Regeneration	WEM37	The walkway along the Chiltern Embankment can only be created as part of the package of proposals put forward in my client's full submission. However, if these proposals do not proceed it is very unlikely that such a walkway can be brought forward, partly as a result of cost, but of equal importance the health and safety aspects given that this will be onto land alongside a busy railway line.	This has been discussed previously, whereby the provision of the new woodland walk is supported by the Council. However, it is considered that the benefits do not outweigh any potential harm in the absence of the formal consideration of the associated impacts. Furthermore, no financial viability information has been formally submitted or assessed and it is therefore not possible to fully comment on the deliverability of the woodland walk through cross-funding provided by the redevelopment of the Solum Regeneration land to the South of the Railway (Site W4) and a limited amount of development within Site W3.
TfL	WEM37 WEM41	The Walkway through the woodland along Chiltern embankment is supported in principle by TfL as a way of reducing severance. Brent will need to consult with TfL, Network rail and Chiltern Railway to develop further options. If the pedestrian access to the northern part of the railway were to proceed there would need to be agreements with Network Rail and appropriate safety measure in place to prevent access to the tracks. TfL would encourage a legible London or similar way-finding approach which should be introduced through the industrial estate.	Suggested changes to para 11.10: There are a number of options for achieving this including creating new public open space and improving access to existing open spaces. Any improvements will require consultation with <u>key stakeholders</u>, initial investment and ongoing maintenance and management. Development contributions towards open space improvements will be included in appropriate site allocations.
Brent Campaign Against Climate Change	WEM38	We welcome the proposal to include food growing areas in new development (WEM 38) and the use of temporary vacant spaces. However, we do not agree to the claim that restricted space means that such spaces cannot be provided in any new schools in the area. Raised beds do not take up much space and there are many imaginative solutions involving	Support welcomed. Whilst food growing in schools is supported by Brent, it is more appropriately left to the discretion of the school rather than be required by planning policy. The council supports food growing schemes in appropriate

		containers, window boxes, growing walls etc that could be incorporated into new build. In addition the growing spaces in existing schools in the area show what can be done. Provision of demonstration food growing areas in newly created parks would be useful as well as support for finding food growing spaces alongside the Chiltern/Metropolitan and Jubilee railway lines. Food growing in schools raises awareness of the children about the impact of climate change and encourages healthy eating and a long term interest in gardening. It links with the curriculum and awards such as Healthy School and Eco School. The Council should be vigorously supporting it and making every effort to find food growing space for children. The Metropolitan Housing Trust is already working on these issues on the Chalkhill Estate with residents and are seeking additional growing spaces on the estate Involvement of other housing providers should be sought.	circumstances, including on open land, adjacent to housing estates, providing that it does not result in a significant reduction in public open space. Your point about the provision of demonstration food growing areas is noted and will be passed on to Brent's Parks Service.
Environment Agency	WEM41	We support this policy. However, it is important a careful balance is struck between access for people and ensuring there are also quiet/isolated/undisturbed habitat areas so that wildlife will use these areas. Planning proposals should make provision for both of these needs wherever possible. We would welcome a reference to this 'careful balance' within the policy or guidance text.	Support welcomed. Suggested change to para 11.15: There are limited areas of nature conservation value in Wembley, reflecting its built up urban character. The main areas of habitat are the Chiltern line embankments, Wealdstone Brook and Brent River Park. There are also smaller wildlife pockets at St John's churchyard, Oakington Manor Primary School, Copland Community School, Ark Academy and the Metropolitan Line embankment. Much of Wembley is considered to be <u>When improving areas for</u>

Environment Agency	WEM42 and supporting text	We support this policy which seeks opportunities through development to restore the River Brent and Wealdstone Brook. We welcome the text in paragraph 11.18 which makes specific reference to the Water Framework Directive and the current status of the waterbodies. Our only query is with regard to the policy aims for each river. For the river Brent the aims are to have regard to its natural setting and enhance biodiversity – however, Annex B of the Thames RBMP indicates that renaturalisation is also a key measure to help this waterbody achieve ‘good’ status (e.g. removal of hard structures/banks, re-opening culverts). We would like to see ‘naturalisation’ included in the policy for the River Brent. The London Rivers Action Plan sets out the river restoration projects that are identified for the Wealdstone Brook and River Brent. Two of these projects are close to or within the Wembley Area. We would also like to see a reference to this action plan within the guidance text – http://www.thercc.co.uk/lrap.	<u>wildlife deficiency in areas of wildlife</u>, a careful balance should be struck between ensuring separate undisturbed habitat zones and areas that people can enjoy and relax in. Support welcomed. Suggested change to WEM42: Development proposals adjacent to the River Brent and Wealdstone Brook should contribute to the naturalisation of the river have regards to its natural setting and enhance biodiversity. Add sentence to WEM42 supporting text: <u>The London Rivers Action Plan includes restoration projects for the Wealdstone Brook and River Brent. Two of these projects are within Wembley and any improvements to the rivers should be in line with this plan and the Brent River Valley chapter of Natural England’s publication London’s Natural Signatures.</u> Add The Rivers Restoration Centre’s London Rivers Action Plan to AAP delivery mechanisms and supporting evidence.	
Canal & River Trust	WEM42 supporting text	The Brent Feeder flows to the north east corner of the AAP boundary, and then beneath the land in a culvert. Within the AAP boundary it is owned and managed by the landowner(s), before it comes back into the Canal & River Trust’s area of ownership. It is essential that the Feeder is maintained appropriately, and it should be mentioned within the AAP to make sure that developers are fully aware of	Suggest separating paras 11.17-19 into distinct paragraphs for Brent and Wealdstone: The River Brent and the Wealdstone Brook natural open spaces have an important role in providing open space provision, increasing biodiversity and reducing flood risk. They provide a natural landscape in an urban setting and offer a different type of open space in Wembley. The enhancement	

		it. We mentioned this in our previous consultation response, and it was not included, so we would be keen to understand if there is a reason why this can't be taken forward.	and improvement of these natural open spaces will contribute towards combating the deficiency in the provision of open space in Wembley. The River Brent is a Site of Borough Nature Conservation Importance Grade I. The River Brent open space is poorly connected to the surrounding area and is under-used. <u>Opportunities to improve links and naturalise the River Brent will be considered through the development management process. The Brent Feeder, which is partly culverted underground, is owned and managed by landowners across the AAP area. It is essential that the Feeder is maintained appropriately.</u> The Wealdstone Brook is a Site of Borough Nature Conservation Importance Grade II. Historically the Wealdstone Brook has been canalised and culverted along its length to make way for development. The Wealdstone Brook Restoration Study contains proposals for the improvements and restoration of the Wealdstone Brook. The proposals include the partial naturalisation of the Wealdstone Brook, tree planting to identify its location, a brook side walk, and ecological improvements. These proposals are accompanied by an indicative costing for each one put forward. Future regeneration should use the opportunity to restore the natural river corridor by partial naturalisation. Improvements to the River Brent and the Wealdstone Brook would help meet the requirements of the Thames River Basin Management Plan and the need to improve water quality. Under the Water Framework Directive (WFD), rivers and river bodies are assessed on their water quality. The assessment classified the River Brent as having a poor ecological status
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			and the Wealdstone Brook as having a moderate status. The WFD has set the objective for these to achieve a good status or good potential by 2027.
			<u>The London Rivers Action Plan includes restoration projects for the Wealdstone Brook and River Brent. Two of these projects are within Wembley and any improvements to the rivers should be in line with this plan and the Brent River Valley chapter of Natural England's publication London's Natural Signatures.</u>

Chapters 12-16: Site Proposals

Representor	Policy	Comment	Response
Solum Regeneration	W3	The draft AAP states that this area would only support a very limited amount of new housing development. Rather, the Council seeks to maintain and enhance the area's nature conservation value, but also to provide public access through the site. Consequently, to meet these aspirations the site needs to be developed in tandem with the land to the south of the railway line to generate the necessary funding for ecological planting and maintenance works and public footpath provision. There is a lack of open space in Wembley and access to existing open spaces is limited. The strategic policies in the London Plan require open space deficiencies to be addressed. Whilst there has been some progress towards an increase in open space in Wembley, the expected population growth will	The council does not accept that the maintenance and enhancement of nature conservation value requires the site to be developed in tandem with the land to the south of the railway line. The council is supportive of measures to enhance the nature conservation value of the northern cutting and provide public access. However, the indicative proposals put forward by Solum Regeneration involve significant works to a large amount of land that has been designated as a Site of Importance for Nature Conservation and, whilst mitigation measures have been proposed, the proposals need to be formally evaluated. Addition to W3 text in light of flood risk analysis: <u>Site W3 is in a Local Flood Risk Zone (LFRZ) in the Wembley Stadium Critical Drainage Area (CDA) which has several areas of surface water flooding affecting property and critical infrastructure. Brent's Surface Water Management Plan</u>

		require new open space. The need to enhance and improve public open space is also established in the adopted Core Strategy. Open space improvements have wider health and well-being benefits providing opportunities for active and informal recreation. The Council also has an aspiration to create a woodland walk way along the Chiltern Embankment (WEM37). By opening up the existing open space on our site to the public our scheme contributes significantly to the open space and wildlife policies of the Council. The report by Wardell Armstrong, ecological consultants suggests that there are opportunities for the enhancement to the area with the linkage of the northern and southern areas thereby providing a corridor for wildlife. Whilst, there will be also an opportunity for selective felling on non---native trees and enhancing those that remain to improve the wildlife value of the site. Rather, that the present position of an area where there is no active management and no public accessibility, which is seen by only a few residents rather than to the benefit of the wider community.	(SWMP) identifies mitigation measures for the LFRZ which include road side rain gardens, detention basins and re-profiling ground levels. Measures to alleviate surface water flooding will be required as part of the development of this site.
Solum Regeneration	W4	This site incorporates not only the land in the ownership of Solum but also all the land that fronts onto to the north of the High Road, which represents a number of diverse owners. It is acknowledged that the Council is seeking a comprehensive development of this site albeit this is likely to be a phased over a period of years. We envisage that this area will be redeveloped for a mix of town centre uses, with a retail frontage, and offices and residential above. Also, it is crucial that	The mix of housing units was discussed within the Wembley Link Masterplan which set out the following: "Although this is a town centre area where the provision of non-family housing may be the more obvious choice, careful design should not preclude the delivery of family housing. There are significant opportunities to create larger units with suitable amenity space in the form of ground floor units with gardens, and large apartments with generous balconies and terraces." It is considered that family housing can be delivered at higher densities and this is reflected by the London Plan density

		the development incorporates a link to encourage movement to, and from, the Stadium to Wembley Central. The draft AAP suggests an indicative number of 890 units on this site; however, this could only be achieved in a high density development of flats. The draft AAP confirms that the London Plan and Core Strategy CP2 requires that some 11,500 homes are provided in Wembley from 2007 to 2026. This should consist of some 50% affordable, but of equal importance is that 25% should be family sized properties namely three or more beds. However, to date, the vast majority of new housing in Wembley has been at the Quintain development, which it is acknowledged has been mainly flats. Consequently, to achieve the number of units envisaged in the draft AAP it will be necessary to continue this trend of an oversupply of one or two bedroom flats when the real demand is for much larger family units. Further, given the Council's aspiration for a dedicated pedestrian link from the Stadium to Wembley Central; this is likely to be a busy route, particularly during when there are activities at these venues. This will have serious implications for residential amenity, which does not seem to have considered in the plan. This can be dealt with satisfactorily with limited residential use, but becomes more difficult with the number of housing units envisaged by the draft AAP. The north of High Road is identified as a secondary	ranges. For example, the London Plan suggest densities between 175 and 355 units per hectare for sites with a "Central" character (averaging between 3.1 to 3.7 Habitable Rooms per unit) and 55 to 255 units per hectare if the sites are built out with an "Urban" character. The Council does not believe that the policies for density set out within the Brent LDF Core Strategy, the London Plan and within this document are not contrary to the policies regarding the provision of family housing. The potential for conflict between the nature of uses and the adjoining spaces is acknowledged by the Council. However, it is considered that this can be dealt with through good design. The inclusion of non-residential uses on lower floors can help to provide separation between homes and busy roads and footways. Furthermore, homes can be designed with ventilation systems which allow windows to remain closed if the residents require further insulation to noise. These design features have been incorporated into the other new residential developments and those that have been granted consent in the immediate vicinity of the Stadium. The Council seeks to ensure the delivery of active town centre frontages on both sides of the High Road to provide a link between the existing town centre and the new town centre development near to the Stadium. The inclusion of a foodstore on either side of the High Road should help to increase footfall to this element of the High Road. However, the provision of the store on the South side (Site W5) would help to strengthen the frontage along the southern side while the northern frontage already includes a number of town centre uses.
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	retail frontage, so the proposals by Solum will lead to this being enhanced with the introduction of a foodstore on the northern part of the High Road, rather than being diluted with a food store on the south on site W5 as envisaged in the draft AAP. In our view, the combination of site W3 and W4 will lead to a greater footfall in the area as it will enable residents in the residential areas to the north to access the town centre more easily. There are two immediate junctions of importance in the consideration of proposals on this site, and equally for the development of W5 discussed below, namely Wembley High Road and Wembley Hill Road, and Park Lane and Wembley High Road. These junctions have been identified as requiring improvement in the AAP Preferred Option Report. However, work will be undertaken on the former junction as part of the Wembley Masterplan, and funds are understood to be available for these works The present indicative allocation of some 890 residential scheme would have a greater AM peak traffic generation than the proposals being proposed by Solum Regeneration an important consideration in this urban area. Further, the preliminary examination of a potential priority junction site access indicates that this would operate within capacity with minimal queuing. The highway issues are discussed more detail in the paper prepared by SKM Colin Buchanan that submitted as part of these representations.	Additionally, the indicative proposals put forward by Solum are likely to significantly impact upon an a designated Site of Importance for Nature Conservation. Traffic generation information would require formal consideration by the Council. However, it should be noted that the 890 residential unit project is for the entire area between the High Road, the Chiltern Railway tracks, Park Lane and Wembley Hill road and as such, a large number of the residential units that have been projected would come forward outside of their site. The area is appropriate for car free housing and this would reduce highway impacts. Addition to W4 text in light of flood risk analysis: Part of Site W4 is in a <u>Local Flood Risk Zone (LFRZ) in the Wembley Stadium Critical Drainage Area (CDA) which has several areas of surface water flooding affecting property and critical infrastructure. Brent's Surface Water Management Plan (SWMP) identifies mitigation measures for the LFRZ which include road side rain gardens, detention basins and re-profiling ground levels. Measures to alleviate surface water flooding will be required as part of the development of this site.</u>
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Solum Regeneration	W5	We understand that there is no current formal agreement between the Council, the owners of Brent House and Copeland School to undertake a joint development for a foodstore of some 6,000sqm as envisaged in the draft AAP. In our view, the necessary phasing of this development, in that the school has to be rebuilt prior to the existing school is demolished that sits on the High Road frontage, as well as Brent House, presently used by the Council for offices until 2013 is likely to result in the foodstore not opening until 2018/2019. At the same time, we believe that a foodstore in the Quintain development may also open further reducing the likelihood of a foodstore being developed on the Copland School and Brent House site. In addition, the draft AAP introduces a retail frontage along this part of the High Road, where at present there is none, and we think that this could dilute the benefits of a major food retail operator in the area, particularly with the aspiration to maintain the active retail frontage on the northern part of the High Road. We consider that there remains significant uncertainty whether this Copland School and Brent House proposal can be achieved given that the parties are not in any formal agreement and that there is a dependence on public funds for the redevelopment of the school, which is an important	The foodstore could be brought forward on the Brent House in isolation and therefore is not contingent on the delivery of Copland School. It could be brought forward imminently subject to planning consent and other normal development considerations. The delivery of the foodstore on the Brent House site could still help to cross-fund the delivery of the scheme. The council has started active marketing of the Brent House site. The inclusion of a food store at Brent House will benefit the town centre as a whole by providing an active link between the older part of the town centre on the High Road and the new shopping area adjacent to the stadium. This contribution to the link is not achieved as well by a new food store as proposed on the Cutting. The proposals for the provision of a foodstore within the Brent House site are far more advanced than those in relation to the Chiltern Cutting Sites. Both sites either adjoin or are within a designated town centre so are considered appropriate in terms of the general principle of the use. There are still significant issues that need to be resolved regarding the Chiltern Cutting site regarding access arrangements from the High Road, Highways matters, impacts on the designated nature conservation area and the principle of the significant redevelopment of that area. Both schemes have the potential to provide significant benefits. However, the Brent House scheme has been tested more thoroughly to date through the Wembley Link Masterplan. Whereas the Solum Regeneration Scheme has not and without the formal consideration of the potential impacts of the scheme, it is considered that this cannot be included as a Site Proposal within the Area Action
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		aspect of the Council's wish to improve and enhance the social infrastructure in Wembley. Indeed, the Council envisages that the redevelopment of Brent House may have to proceed alone.	Plan at this point in time.
Brent	13.2		Additional clarification sentence at end of 13.2: ...Many of the sites are in the Strategic Cultural Area in which major leisure, cultural and tourism uses are encouraged.
Quintain	13.4	We ask that paragraph 13.4 is deleted as neither the extent of the anticipated realignment of South Way nor its benefits are clear from the document. Also, its context with regard to extant planning permissions in this location should also be clarified.	
Quintain	13.6	Paragraph 13.6 should be redrafted as follows: <i>"Junction improvements to support development have already been secured through outline planning permissions. However, as further development is permitted in the immediate and wider area, road junctions adjacent to this site are likely to come under further pressure. Therefore, it may be necessary to identify and safeguard additional land to widen the road at the bridge and to improve the junction layouts at Wembley Triangle and between South Way and Wembley Hill Road depending on the type and quantum of development proposed. Potential land take is identified at Appendix C. Nevertheless, every effort will be made to deliver improvements within the existing highway boundary to avoid delays to the delivery of the Council's strategy."</i>	
Quintain	W6	There is an existing Outline Permission for the LDA	The site proposals are intended to provide guidance regarding

		Lands which includes parcels to the south of the Chiltern Railway which provides for a quantum of development. We ask that <i>'a limited scale of development'</i> is clarified as mentioned in the text of W6 as without a fuller explanation it is not possible to properly consider the proposal. We also ask that the Council's concept of <i>'an employment hub'</i> is clarified for proper consideration and comment.	the scale and type of development that may be acceptable within a site and cannot include a significant amount of information. The extant outline permission for the LDA lands only included a limited scale of development to the south of the White Horse bridge, with the maximum height set at 52 m AOD (approximately 11 m above ground level). The reference to a 'limited scale of development' reflects the size of the development plots and the proximity to suburban residential dwellings. Addition to W6 text in light of flood risk analysis: <u>Site W6 is in a Local Flood Risk Zone (LFRZ) in the Wembley Stadium Critical Drainage Area (CDA) which has several areas of surface water flooding affecting property and critical infrastructure. Brent's Surface Water Management Plan (SWMP) identifies mitigation measures for the LFRZ which include road side rain gardens, detention basins and re-profiling ground levels. Measures to alleviate surface water flooding will be required as part of the development of this site.</u>
Quintain	W8	Within Site Proposal W8 there is a 'requirement' that the 5-a-side football facility should be moved to a nearby site as plot W03 of the Stage 1 Development Area is developed. Whilst we support this aspiration, the arrangement with the operator is a commercial venture and it cannot be guaranteed that relocation will be achieved. There is also no planning justification for such a requirement. This statement should be amended to 'support' for relocation from the Council, for which we are grateful.	The suggested amendment is agreed.

Quintain	W8	Also within W8 there is reference to the regrading of Royal Route to provide for public transport access. We ask that this is revised to remove the reference to public transport for the reasons set out above and instead refers only to vehicular access. Royal Route provides one of the main routes through to the Stadium and these and other types of vehicles will need to use Royal Route to access the parking and other facilities on the Stage 1 Development Area.	The approved Bus Infrastructure Strategy sets out that certain buses will be routed along the Boulevard. Whilst it is possible that revisions to the Strategy may be agreed between Quintain, TfL and the Council in the future, this site allocation reflects the approved strategy. The lowering of Royal Route so that it crosses the Boulevard at grade was an integral part of the Stage 1 consent and is required to create a successful environment and to facilitate bus access.
Quintain	W9	W9 – York House sets out a number of requirements in relation to the development of the current car park fronting Empire Way which serves the occupants of the building. These include ‘ <i>relatively low rise</i> ’ development and ‘ <i>a substantial area of open space</i> ’. We currently object to this Site Proposal. York House overlooks a newly created area of accessible open space and is a fifteen storey building. Neighbouring sites include the 8-storey Quadrant Court and the 14-storey Plaza Hotel, which itself sits on a development site with Outline Permission for an 8 – 23 storey structure. Further, the indicative development capacity given is substantially below that already permitted in the local area and those anticipated in the other Site Proposals, and is not in line with the adopted London Plan. It is therefore currently unacceptable.	Whilst the Council has made alterations to the gyratory adjacent to the site to create an area of public open space, there is still a significant deficit of such space in the local area. This site provides scope for the provision of publicly accessible open space between the buildings, particularly given the commercial nature of York House and the likely commercial uses that are supported on the ground floor of a new development in the car park. This is the only site in the vicinity that is likely to be available for development in the short to medium term that provides such scope whilst maintaining development capacity. The reference to a “relatively low rise” reflects the high rise nature of York House and to promote the provision of good levels of sunlight to existing and new open spaces.
Quintain	W10 W11	We support the principle of a community swimming pool being delivered on Dexion House. However, we note that whilst W10 (Dexion House) and W11 (Malcolm House) are deemed appropriate for residential development no indicative development capacity is given for either site. It is therefore not possible to comment fully on these Proposals and	The residential development capacity for Dexion House was established through the extant consent (129 units) which is due to expire in April 2013. The indicative residential development capacity for Malcolm House is 62 units.
Indicative development capacities to be included but with the			

		we currently object without acceptable justification. Further, in relation to W11 we would advise that the land shown in the Addendum to Appendix C is within our control and will be brought forward during the development of the NW Lands Outline Permission. It is not a requirement of the Malcolms House redevelopment. The text within W11 should be amended to remove the words 'on redevelopment of the site' from the final sentence.	proviso "if residential included": Add to W10: Indicative Development Capacity (if residential) – 129 units W11 It is accepted that the proposed junction improvement is not a requirement of the consented Malcolms House scheme therefore 'on redevelopment of the site' will be deleted from the site proposal Add : Indicative Development capacity (if residential) – 62 units
Quintain	W13	The Site Proposal for W13 – Stadium Retail Park sets out the principle of mixed use regeneration but with a limited amount of residential. We would be pleased to understand the justification for this limit which is indicated at only 45 units per hectare. This is significantly below the site densities permitted elsewhere in the Comprehensive Development Area, which are in line with the adopted London Plan, and it is incomparable with the majority of densities set out in the Site Proposals for residential. We currently object to this without acceptable justification.	The specified residential development capacity (50 units) reflects the presumption that the redevelopment of this site will incorporate a predominance of commercial floorspace, as set out within the site proposal rather than be led by residential development. The site is an existing retail park and the council would wish to see any re-development of the site continue the shopping street northwards to link with Wembley Park. There is an opportunity on this site to help meet jobs targets for the regeneration of Wembley. It is important that there should be a mix of commercial floorspace and residential development across the area so that regeneration is genuinely mixed in use and that sufficient jobs are provided to meet the needs of local people. This site, given its proximity to Wembley Park station, is an ideal site to focus commercial elements on. It should also be borne in mind that the residential capacity

		are also indicative and that higher levels can be achieved where circumstances dictate. Addition to W13 text in light of flood risk analysis: <u>The site is in flood zones 1 and 2. All proposed development will require a detailed Flood Risk Assessment (FRA), in accordance with Section 6.7 of the Brent Borough SFRA. The 'sequential approach' at site level should be applied to steer more vulnerable development such as residential, student accommodation, hotels, and certain community uses towards areas of lowest risk within the site; north west area and southern edge. Density should be varied to reduce the number of vulnerable units in high risk areas. Further site-specific details are set out in the sequential test assessment for the WAAP.</u>
Quintain	W14	In relation to the justification for the connection for North End Road set out in W14, we would refer you to our comments in the Transport section above and also ask that it is made clear that the connection is required for further development that does not currently have outline or detailed planning permission. It is not required for developments that are currently consented. A new road link at North End Road is a key component of the overall strategy enabling the promotion of highway access into Wembley (and beyond) from the North Circular. The MVA Transport Strategy Review (2008) stated that the link will benefit the whole development area during Stadium events. The link will help to reduce traffic along Neasden Lane and Forty Lane allowing prioritisation for non-car modes. The connection may also facilitate improvements to bus services, depending on results of the Bus Strategy. It is not required to facilitate development that is currently consented. Change to 13.41: Because of the noise generated by the railway and station, and the limited residential amenity, long-term residential development of Arena House is not <u>will only be considered appropriate on the site if it meets outdoor amenity space</u>

		<u>requirements and provides sufficient noise and vibration attenuation against the railway line...</u> <u>Change to W14 text in light of flood risk analysis:</u> <u>The site is in flood zones 1-3. All proposed development will require a detailed Flood Risk Assessment (FRA), in accordance with Section 6.7 of the Brent Borough SFRA. While the council considers that developing the site provides wider sustainability benefits to the community that outweigh flood risk, a 'sequential approach' at site level should be applied to steer more vulnerable development such as education, student accommodation and hotels uses towards areas of lowest risk within the site; to the western area. None of the proposed uses are compatible with flood zone 3b. Density should be varied to reduce the number of vulnerable units in high risk areas. A minimum 8 metres buffer zone must be provided for the waterway and development should contribute to the re-naturalisation of Wealdstone Brook.</u> <u>Further site-specific details are set out in the sequential test assessment for the WAAP. Any redevelopment of Crescent House should have regard to flood risk and flood risk assessment will be required. Opportunities to semi-naturalise the Brook and provide for public access will be sought on redevelopment of the site.</u>
Brent	W15	Flood Risk Analysis Addition to W15 text in light of flood risk analysis: <u>The site is in flood zones 1 and 2. All proposed development will require a detailed Flood Risk Assessment (FRA), in accordance with Section 6.7 of the Brent Borough SFRA. The 'sequential approach' at site level should be applied to steer more vulnerable development such as residential, and hotel uses towards areas of lowest risk within the site; area from north west to south. Density should be varied to reduce the number of vulnerable units in high risk areas. Further site-</u>

Brent	W16	Flood Risk Analysis	specific details are set out in the sequential test assessment for the WAAP. Change to W16 text in light of flood risk analysis: <u>The site is in flood zones 1-3. All proposed development will require a detailed Flood Risk Assessment (FRA), in accordance with Section 6.7 of the Brent Borough SFRA. While the council considers that developing the site provides wider sustainability benefits to the community that outweigh flood risk, a 'sequential approach' at site level should be applied to steer more vulnerable development towards areas of lowest risk within the site; to the north. None of the proposed uses are compatible with flood zone 3b. Density should be varied to reduce the number of vulnerable units in high risk areas. A minimum 8 metres buffer zone must be provided for the waterway and development should contribute to the re-naturalisation of Wealdstone Brook. Further site-specific details are set out in the sequential test assessment for the WAAP. The council would wish to improve the setting of the Wealdstone Brook and the tree belt through the north of the site. Opportunities to semi-naturalise the Brook and provide for public access will be sought on any redevelopment of the site. Redevelopment proposals must be accompanied by a flood risk assessment.</u>
Quintain	W18	The Indicative Development Capacity set out for Wembley Retail Park at W18 is currently unacceptable as it is significantly below acceptable levels for the anticipated type of regeneration as set out in the adopted London Plan. In addition, we do not accept that the orientation of the park should be specified as east-west in the AAP. The urban design of the area will emerge in response to other permitted developments in the area and could be better orientated north-south. We would ask that	The indicative residential development capacity reflects the high proportion of family housing (thus affecting the number of habitable rooms per unit), the domestic character (resulting in an "urban" character rather than "central" and the incorporation of the public open space within this site. The Council is strongly of the opinion that an east-west oriented park will receive significantly higher levels of sunlight than one oriented north-south due to the separation that is provided by Engineers Way. To achieve similar levels of

		the space is specified as 'a new public open space with frontage to Engineers Way'.	sunlight with a north-south orientation would require significant separation between the park and the adjoining buildings which would significantly limit the development potential of the site. Furthermore, the east-west orientation allows greater connectivity to the school to be delivered at the eastern end of the site and to the residential development on the eastern side of the Stadium. The Council supports amendments to refer to the mixed use nature of the redevelopment of this site and that the provision of a major leisure attractor is supported. Changes to WEM27: Leisure, Tourism and Cultural uses <u>Strategic Cultural Area</u> <u>Major</u> leisure, tourism, and cultural uses are encouraged within the <u>Strategic Cultural Area</u> area shown on Map X. <u>Major leisure, tourism and cultural development is</u> <u>appropriately located on sites to the east of Olympic Way as shown on the Proposals Map.</u> <u>Leisure, tourism, and cultural</u> <u>uses can form part of a mixed use scheme, including</u> <u>residential where appropriate.</u> Significant improvements to public transport will be required where development will attract a large number of trips. Change to W19: <u>This site lies within the Strategic Cultural Area where leisure, tourism and cultural uses are particularly encouraged. The site currently has permission for mixed use development including residential. A major leisure attraction as part of the mixed use regeneration is also sought to complement and add to Wembley's offer on stadium non event days</u> <u>The Wembley Masterplan seeks the development of a major leisure attraction that will complement and add to Wembley's offer on stadium non event days.</u> It is likely that the site is large
Quintain	W19 WEM27	We do not support the Site Proposal for Wembley Stadium Car Park (W19) as a major leisure attraction. As stated above, the site currently has Outline Permission for mixed use regeneration, including aparthotel, office, residential and close care accommodation. It comprises half of the Stage 1 Development Area and provides a substantial proportion of the Stadium's Event Day parking. Given this and the ambitions for W28 to provide a transition between the mixed uses around the Stadium and the industrial estate to the east, including residential, we ask that the first sentence of W19 is amended as follows: <i>"This site will provide a mixed use regeneration, including residential. A major leisure attraction as part of the mixed use regeneration is also sought. This will complement and add to Wembley's offer on stadium non event days."</i> This would be in line with the Site Proposals for neighbouring sites in the Comprehensive Development Area and the ambition set out in paragraph 4.31, which anticipates that land east of Olympic Way will have a more residential character focussed around a newly created park.	

Brent	W21	Flood Risk Analysis	enough, and in such close proximity to the Stadium, that a multi use complex can be accommodated and serviced. The physical and operational relationship between any new development and the Stadium will require careful policy management and planning. Change to W21 text in light of flood risk analysis: Redevelopment for residential use including at least as many family sized units as would be lost and associated amenity space. Development should provide a buffer to the brook of at least 8 metres and semi-naturalisation of the brook will be sought. <u>The site is in flood zones 1-3. All proposed development will require a detailed Flood Risk Assessment (FRA), in accordance with Section 6.7 of the Brent Borough SFRA. While the council considers that developing the site provides wider sustainability benefits to the community that outweigh flood risk, a 'sequential approach' at site level should be applied to locate homes towards area of lowest risk within the site; along Brook Avenue. The proposed use is not compatible with flood zone 3b. Density should be varied to reduce the number of vulnerable units in high risk areas. A minimum 8 metres buffer zone must be provided for the waterway and development should contribute to the re-naturalisation of Wealdstone Brook. Further site-specific details are set out in the sequential test assessment for the WAAP. Proposals in Flood Zones 2 and 3 must be accompanied by a flood risk assessment and the sequential test and exception test should be applied. Development should not impede flood water flows and should not increase surface water run-off or reduce water storage. Basement dwellings will not be allowed in flood Zone 3.</u>
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Brent	Map 15.1	Wembley Eastern Land	Site proposals (page 111) - amend W26 Watkin House to W26 Watkin Road.
Brent	W25	Flood Risk Analysis	Change to W25 text in light of flood risk analysis: <u>The site is in flood zones 2-3. All proposed development will require a detailed Flood Risk Assessment (FRA), in accordance with Section 6.7 of the Brent Borough SFRA. While the council considers that developing the site provides wider sustainability benefits to the community that outweigh flood risk, a 'sequential approach' at site level should be applied to steer more vulnerable development such as residential uses towards areas of lowest risk within the site; northern and southern areas. None of the proposed uses are compatible with flood zone 3b. Density should be varied to reduce the number of vulnerable units in high risk areas. Further site-specific details are set out in the sequential test assessment for the WAAP.</u> Development should allow for a nodal point on the brook where the buffer strip should be widened to about 20 metres. Removal of part of the canalised wall and regrading of the bank to provide a more natural setting will be sought. The site would be suitable for housing facing the brook providing the restoration work is carried out. Proposals in Flood Zones 2 and 3 must be accompanied by a flood risk assessment and the sequential test and exception test should be applied. Development should not impede flood water flows and should not increase surface water run-off or reduce water storage. Basement dwellings will not be allowed in flood Zone 3.

Brent	W26	Flood Risk Analysis	Change to W26 text in light of flood risk analysis: <u>The site is in flood zones 1-3. All proposed development will require a detailed Flood Risk Assessment (FRA), in accordance with Section 6.7 of the Brent Borough SFRA. While the council considers that developing the site provides wider sustainability benefits to the community that outweigh flood risk, a 'sequential approach' at site level should be applied to steer more vulnerable development such as residential, residential care homes, and certain community uses towards areas of lowest risk within the site; western and southern areas. None of the proposed uses are compatible with flood zone 3b. Density should be varied to reduce the number of vulnerable units in high risk areas. Further site-specific details are set out in the sequential test assessment for the WAAP. Proposals in Flood Zones 2 and 3 must be accompanied by a flood risk assessment and the sequential test should be applied. Development should not impede flood water flows and should not increase surface water run-off or reduce water storage. Basement dwellings will not be allowed in flood Zone 3.</u>
Brent	W27	Flood Risk Analysis	Change to W27 text in light of flood risk analysis: <u>The majority of the site is in flood zone 1; however there are small sections of flood zone 2 adjacent to the Wealdstone Brook. The buffer strip will remove the developable area of the site wholly into flood zone 1. Proposals must be accompanied by a Flood Risk Assessment. Development should not impede flood water flows and should not increase surface water run-off or reduce water storage.</u>
Quintain	W28	We welcome the ambition for mixed use regeneration to come forward on W28 (First Way), including residential, in order to provide an appropriate buffer between the development surrounding the Stadium and the industrial estate to	Support welcomed

		the east.
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Chapter 17: Delivery and Monitoring – Chapter 18: Superseded Policies

Representor	Policy	Comment	Response
Quintain	17.3	Paragraph 17.4 states that, 'Wembley is providing half of the Borough's new housing growth and most of the commercial growth', and we are pleased to see the acknowledgement in paragraph 17.3 that the delivery of the vision for Wembley is reliant on implementation of the AAP by private sector developers and landowners. To that end, we look forward to participating further as the AAP is developed to ensure that it delivers the anticipated growth for Wembley and Brent as a whole.	Support welcomed Add text at appropriate place on page 123 to explain how we monitor this <u>The transport target to reduce the mode share of car trips from 37% towards 25% will be monitored using the outcomes of travel plan monitoring which is undertaken annually as part of the obligation on developers to report on progress made towards their travel plan targets.</u>

Chapter 19: Glossary

Representor	Policy	Comment	Response
MOPAC/MPS	Glossary	The MOPAC/MPS note that the glossary does not include a definition of social infrastructure, nor are policing facilities included within the Social Infrastructure chapter of the draft AAP. The addition of 'policing' within the definition of social infrastructure is concurrent with the NPPF, in particular paragraphs 69 (as outlined above) and 156 which requires LPAs to set out strategic priorities in the Local Plan to deliver the provision of health, security, community and cultural infrastructure and other local facilities. It is clear that community	Agree. Add to Glossary: Social Infrastructure: Covers facilities such as health provision, early years provision, schools, colleges and universities, community, cultural, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities.

		facilities include security and by definition, policing. The MOPAC/MPS therefore recommend that the Glossary includes a definition of social infrastructure in line with the adopted London Plan definition, as set out below: Social Infrastructure: Covers facilities such as health provision, early years provision, schools, colleges and universities, community, cultural, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities.	
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Chapter 20: Land Take Maps

Representor	Policy	Comment	Response
Quintain	Land Take Maps Appendix C	In terms of the land take maps at Appendix C and as amended, the Empire Way / Engineers Way drawing appears to replicate the position agreed between us and we would be pleased if you could confirm this. If the Council is seeking additional land then we need to be consulted on the proposals and to understand the justification for amending the junction improvements from the agreed position. Similarly, the First Way / Engineers Way junction proposals are known to us through the Stage 1 S106 Agreement and subsequent discussions with the Council in relation to the School Site. If the proposed land take is increased from the agreed position we need to be consulted and we respectfully point out that we have an extant permission that can be implemented.	We confirm the maps represent the agreed position.
UKI (represented by DP9)	Map 20.4	Map 20.4 includes a strip of land identified for	The Wembley Area Action Plan is an important opportunity to

		safeguarding along the northern edge of the Kelaty House site. Given the form of the scheme at Kelaty House, this land is no longer available and should be removed from the plan. This is due to the positioning of a building on this part of the site. As an alternative, it is expected that the Council will explore other options to deliver the required improvements to this part of the highway. This was noted in the officer's report when the scheme was considered at committee on 22 August 2012. The report commented that further consideration and analysis needs to be completed by the Council should this land not be available. It is expected that this further analysis will be completed to inform further drafts of the Wembley AAP, which will safeguard land to deliver this Council aspiration.	define which pieces of land would be required to deliver the transport strategy for Wembley. In the case of the land on the southern edge of Fifth Way which is occupied by the Kelaty House, the plan is not yet adopted and therefore planning approval was given for the development. However, the preferred option for delivering the transport strategy for Wembley still remains the land to the south of Fifth Way. An alternative scheme using land to the north of Fifth Way (occupied by the Europarts site) has also been investigated. Both pieces of land will be retained within the plan in the event that the developments on either site don't come forward in their full/envisaged form, or the timescales are protracted. Add text on p134 after 20.4. <u>"This map shows alternative options, so that if development comes forward in this location, then some flexibility is built in to provide the necessary transport improvements"</u>
Quintain	Maps 20.5 and 20.6	We note the proposed revisions to the LDA Lands land take at the junction of South Way and Wembley Hill Road and in order to deliver the widening of the Chiltern Railway Bridge as shown on Maps 20.5 and 20.6 as amended. The current Outline Permission on the LDA Lands provides for improvements to the Triangle and South Way / Wembley Hill Road junction and these improvements have been agreed with the Council as fully mitigating the impacts of the currently permitted development within the Comprehensive Development Area. We note also that land is required for an improved bus interchange in this area and the proposed restriction on car park access to avoid conflict with Stadium	The land requirements shown in map 20.5 and 20.6 will permit the junction improvement at Wembley Hill Road and South Way to be undertaken. As development at Mahatma Gandhi House and LDA Lands is taken forward, we would also look to make provision for a bus interchange and for taxi drop off for stadium events. Definite land requirements have not been confirmed yet for this, and these would be negotiated with developers on re-development at these sites. Add following text to that at 20.6 <u>"current outline permission on the LDA Lands provides for the improvements at the Triangle, and South Way / Wembley Hill Road. Some further land may be required along South Way for other transport facilities including bus stops, and taxi drop offs."</u>

		visitors on Event Days. We cannot comment fully on the proposals without reviewing the justification for these alterations and we ask that this additional information is made available for full consultation.	
Quintain		We ask for confirmation that the land take identified along the northern edge of the Kelaty House site has been preserved as part of the recent planning permission (ref: 12/1293).	The land shown as being required from the northern edge of the Kelaty House site has been retained along with an alternative provision on the opposite (northern) side of Fifth Way. This is to give flexibility if the development at Kelaty House comes forward in a different way or timescales become extended.
Quintain	Map 20.7 Site W4 Site W5	Map 20.7 shows land take for W4 in order to deliver improvements to the Wembley Triangle junction. According to paragraph 6.15 improvements to the Triangle are required <i>'to mitigate against the impacts of traffic generated from developments'</i> . Improvements to the Triangle have been secured through the Outline Permission for W6 (South Way / Wembley Stadium Station). Further work carried out as part of the Transport Assessment in support of the NW Lands application showed that appropriate junction improvements could be delivered within the highway boundary to fully mitigate the impact of permitted development in the regeneration area. These improvements are agreed with the Council. Identifying land outside the Council's control is likely to delay delivery of the improvement and impact adversely on the delivery of the Core Strategy. We ask that any junction design that requires land outside the Council's control is carefully scrutinised and considered fully against the merits of a solution that does not require third party ownerships. We would be pleased to be involved in that scrutiny, particularly as cash contributions towards the	It is accepted that a junction improvement can be delivered at the Triangle using land already identified through the Outline Permission for W6 (South Way / Wembley Stadium station). The identification of the land on Map 20.7 gives the flexibility, if required, for an option for the longer term, which will provide additional highway capacity, if required. The junction improvement which relies on the land not within third party ownerships will be progressed first, and only if this improvement is not providing the necessary benefit, will be other option be considered longer term. Funds from the NW Lands S106 agreement would not be used to pay for acquiring this additional land. Amendment to the text in site W4. Add the following after the last sentence: <u>"In the longer term, if there was comprehensive re-development on this site, the council would seek to acquire this small portion of land to facilitate additional junction improvements beyond those already identified for the Wembley Triangle as part of existing permissions."</u>

		delivery of highways improvements secured through the NW Lands S106 Agreement are targeted to pay for improvements to the Triangle junction before development comes forward on the LDA Lands. We do not want to see our money diverted into acquiring land that previously has been proven and agreed not to be needed; nor would we want to see regeneration and the delivery of the Council's Core Strategy unduly delayed. In relation to this, we note within W5 that a car park is envisaged to serve a new foodstore and other town centre uses on the Copland School / Brent House site. We ask to see analysis that proves that this additional capacity requirement can be accommodated in improvements to the Triangle junction within the highway boundary.	
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Foreword

Brent Council ~~has started~~ is in the process of preparing a new development plan for Wembley, called the Wembley Area Action Plan. It will be important in determining how Wembley develops over the next 15 years or so. Building on the council's vision to develop Wembley as a destination which will drive the economic regeneration of Brent, the plan includes key planning objectives and policies and provides guidance for the development of over 30 sites in the Wembley area. Our aim, reflected in the Plan, is to provide new homes, jobs and shopping and leisure facilities, whilst ensuring that important infrastructure and services, such as transport improvements and new schools, are delivered to meet the needs of local people.



(Cllr) George Crane

Lead Member for Regeneration and Major Projects

At Brent we are committed to full community involvement in the important decisions that are made and particularly in bringing forward plans that are likely to affect the local community.

Two stages of consultation have been undertaken on the Area Action Plan to date. A final stage of consultation is to be undertaken before the plan is submitted to the Secretary of State for Examination. I hope you will take this opportunity to participate in the process of drawing up the new plan. If we are to shape Wembley the way you want to see it then we need to hear from you. Please tell us what you think.

Foreword

How to Give Your Views

Contact us with any questions or for copies of this document. All the documents relating to the Wembley Area Action Plan can be found on the council's website www.brent.gov.uk/ldf. Copies are also available at libraries and one stop service offices.

You can get copies and more information by contacting the Planning and Transport Strategy team on 020 8937 5230. You can also contact the team by e-mail at ldf@brent.gov.uk or in writing at the address below:

Planning and Transport Strategy Team
Planning & Development
London Borough of Brent
Brent House
349 High Road
Wembley
Middlesex
HA9 6BZ

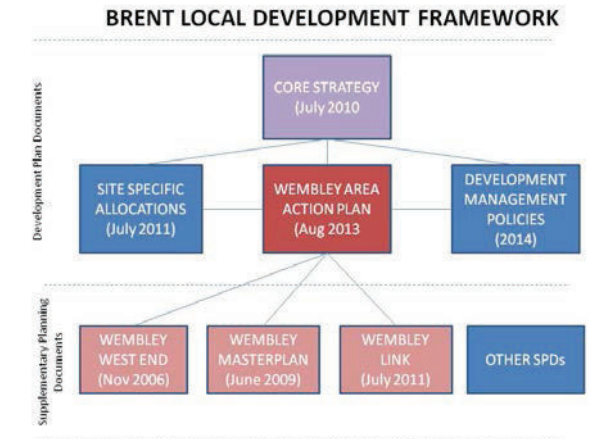
Introduction 1

What is the Wembley Area Action Plan?

1.1 The Wembley Area Action Plan (AAP) sets out the strategy for growth and regeneration in Wembley for the next 15 years, once adopted. It is an important part of the development plan for the Borough. Ultimately, the development plan will be made up of a number of documents, two of which, the Core Strategy and the Site Specific Allocation document, have been adopted already by the council. The Core Strategy sets out the spatial planning strategy for the development of the Borough focusing growth and development in 5 key Growth Areas, the largest of which is Wembley. The Site Specific Allocations document identifies 70 sites around the borough where new development is likely to take place, and provides planning guidance for those sites. The Wembley Area Action Plan complements these documents by providing a detailed Plan for development in the Wembley Area and brings up-to-date, and consolidates, existing planning policies for Wembley in a single development plan document.

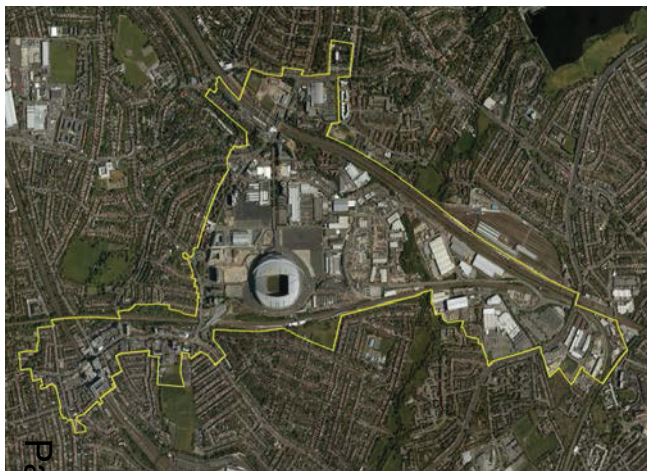
1.2 The council's Core Strategy, adopted in 2010, sets the context for development of the Wembley Area by establishing a vision for the future of the borough as a whole, a set of objectives to be achieved by development and a set of core policies to achieve those objectives. For this reason, much of the vision and most of the objectives for Wembley are already established and are, therefore, incorporated into an updated vision and set of objectives in section 2 of this Development Plan Document (DPD).

1.3 In addition, the Site Specific Allocations DPD, adopted in 2011, has established the planning guidance for some of the development sites. Relevant site guidance from this has been carried forward into the draft Area Action Plan and supplemented by new or reviewed planning guidelines for the remaining key opportunity sites in the area. The plan, when adopted, will supersede policies and proposals currently included in the Wembley Regeneration Area chapter of the Brent Unitary Development Plan 2004. The Wembley Masterplan, which deals with the 70 hectare main regeneration area around the stadium, continues to provide detailed planning guidance on matters such as scale and massing, the public realm, streetscape and design quality for this area. In addition, the Wembley Link Supplementary Planning Document (SPD) provides similar guidance for the development of the eastern end of the High Road and the Wembley West End SPD guides development on the Curtis Lane car park site behind the High Road. Those parts of the Unitary Development Plan (2004) and the Site Specific Allocations DPD (2011) that will be superseded by the Area Action Plan are listed in Appendix A.



1.4 The area covered by the Plan is essentially the part of Wembley where most of the regeneration is needed and is likely to take place. This covers the existing town centres of Wembley and Wembley Park, the Wembley Masterplan area, including the Stadium and key development sites around it, and the industrial area extending as far as the North Circular Road, which is also the main gateway to the area by road. It covers an area of approximately 230 hectares. Although this is a tightly defined area, its future is extremely important to the borough as a whole. Half of the borough's projected new housing and most of its new commercial floorspace will be located here. Consequently, it is important that the wider community, including residents, businesses and other interested organisations, is involved in the preparation of the Plan.

1 Introduction



Picture 1.1 Area Action Plan Boundary

How does the 'Preferred Options' consultation stage fit into the process of preparing the AAP?

1.5 The Plan has undergone two rounds of consultation. The first round was a public consultation on 'Issues and Options' during which views were expressed about which options should be taken forward into a draft Plan. Views expressed on the options put forward and the draft policies informed the council's preferred options for planning the Wembley area. This round of consultation is the second stage of public consultation on the proposed Plan. The first round was a public consultation on 'Issues and Options' during which views were expressed about which options should be taken forward into a draft Plan. In preparing this document account has been taken of views expressed on the options put forward and the draft policies are therefore the council's preferred options

for planning the Wembley area. The council has also provided an explanation as to why certain options have not been pursued. In addition, a Sustainability Appraisal has been carried out to assess, in general terms, the sustainability of the chosen options. A report setting out the appraisal results is also available as part of the consultation, and comments on this are welcome. You can view the Sustainability Appraisal report at www.brent.gov.uk/ldf.

1.6 A second round of consultation was then undertaken on the preferred options Plan. Comments received during the consultation have been considered and taken into account in producing a Pre-submission version of the Plan. There is now an opportunity to comment on the Pre-submission Plan before it is finally submitted to the Secretary of State for Examination by an independent Planning Inspector. ~~Views are being sought on the draft Plan. Where there are objections to a particular policy or paragraph then this should be clearly indicated along with how it should be changed, e.g. an alternative wording. In order to help people respond to the consultation, a questionnaire has been included at appendix 1 of this document. Separate copies of this are also available.~~

Next Steps

1.7 The council will submit comments received to the Secretary of State for consideration. The submission to the Secretary of State will also include comments received during all previous

consultations. There is likely to be an opportunity to make verbal representations to the Inspector at an informal hearing session. Comments will be taken into account in producing a version of the Plan that can be submitted to the Secretary of State for Examination. At this time, estimated to be about January 2013, the Plan will be published and there will be an opportunity to comment on it before it is finally submitted. Comments at this stage will be made available to an independent Inspector for his/her consideration in examining the Plan. There is likely to be an opportunity to make verbal representations to the Inspector at an informal hearing session.

1.8 Part of the process of preparing the Plan is the gathering of information or evidence to provide justification for the policies and proposals. The evidence base in support of the Plan has largely been compiled in support of the Core Strategy and Site Specific Allocations DPD's. This has been supplemented by more recent information where this is available and by further studies commissioned to inform the AAP. All the evidence is available for viewing on the council's website at www.brent.gov.uk/ldf.

Finding your way around this report

1.9 The report is arranged into different sections:

- An explanation about what the Area Action Plan is and how it sits with existing policy is in section 1
- The strategic planning context is set out in section 2

Introduction 1

- What will Wembley be like in 2026? A vision and a set of objectives for the area is in section 3
- A set of planning policies and proposals together with the justification for these is included in sections 4 - 17

How to respond

1.10 You can submit comments on the Pre-submission version of the Plan by using the consultation tool, by e-mail or in writing to the address shown on page 8. At this stage comments should relate to whether you consider that the Plan is 'sound' - To be 'sound' a plan should be positively prepared, justified, effective and consistent with national policy. You can respond to any aspect of the document online by using the consultation tool or just send in your comments on the draft Plan by e-mail or in writing to the address shown on page 7. We would like to know whether you think the draft policies are appropriate or, if not, how you think they should be changed. Let us know as well whether you think there are policies that have not been included which should be.

2 Strategic Planning Context

Spatial Development Strategy

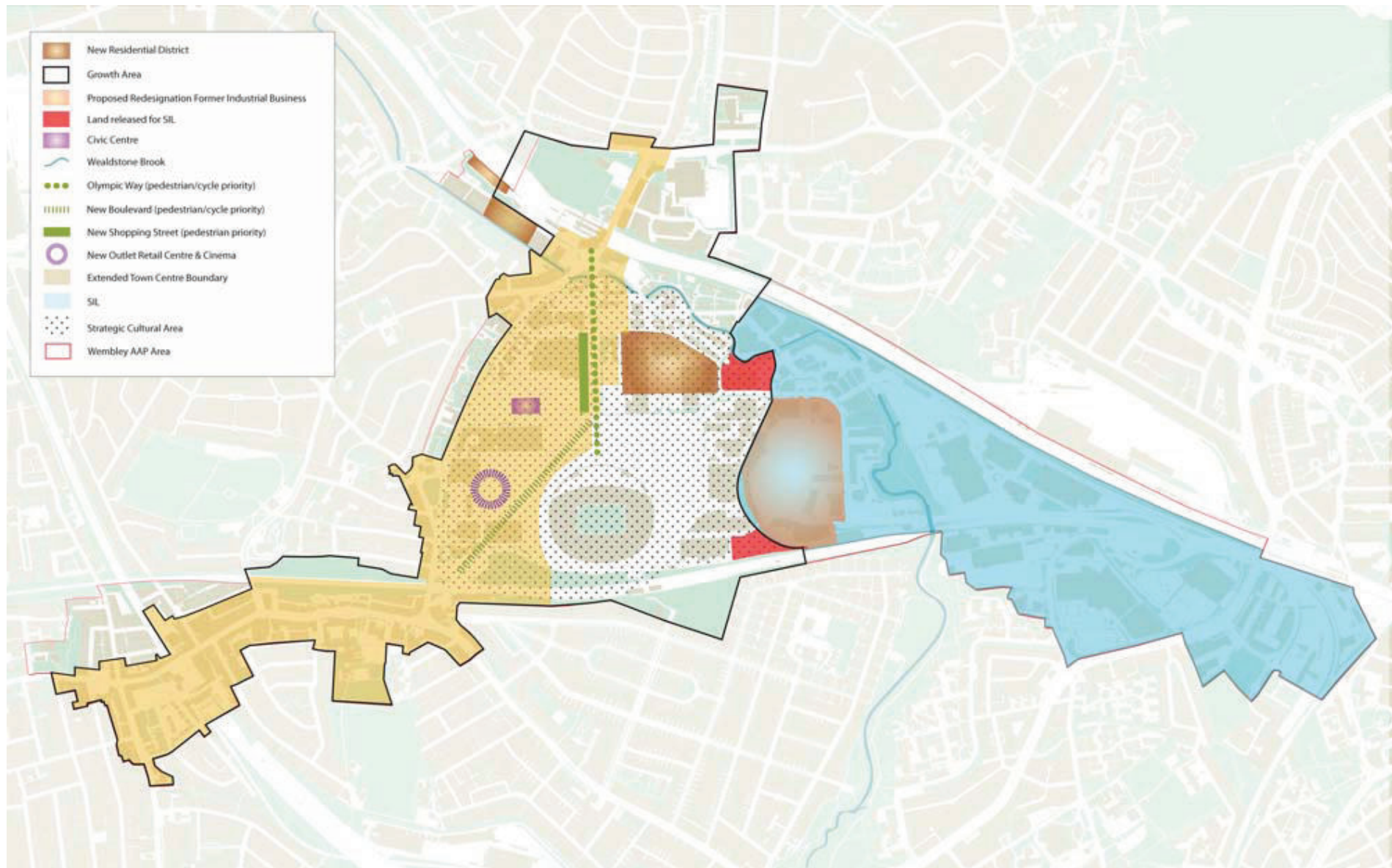
Growth Area

2.1 Wembley is designated as a Growth Area

and is expected to deliver around 11,500 new homes, 10,000 new jobs and 30,000 sq.m of new retail floorspace. Core Strategy policy CP7 sets out the strategic direction for development in Wembley which includes new infrastructure to

support growth. The Wembley Area Action Plan provides the details of what, where, how and when this growth will be delivered. A summary is provided below and Map 2.1 shows the key elements of the strategy.

Strategic Planning Context 2



Map 2.1 Key Diagram

2 Strategic Planning Context

Regeneration Context

2.2 In 2004 the London Borough of Brent granted outline planning permission to Quintain.

2.3 Estates and Development plc for a major mixed-use regeneration scheme covering 17 hectares of land surrounding the new Wembley Stadium. Much of the approved scheme called Quintain Stage 1 is still to be delivered, including infrastructure required by planning obligations attached to the phased delivery of the development.

2.4 In 2011 permission was granted for a second stage of mixed-use redevelopment to provide up to 160,000m² of floorspace in the area north of Engineers Way, from Olympic Way to Empire Way. It is likely now that the main focus for the Quintain regeneration will remain to the east of the Stadium and Olympic Way. The focus of development to date has been to the west of the Stadium.

2.5 In addition to the major regeneration being brought forward on the Quintain development, there are a number of other large scale developments underway across the Wembley area. Permission has been granted for hotels, residential development, student accommodation, retail and educational facilities, all of which will continue the momentum of change in the area.

Housing

2.6 New homes will be built near to main transport hubs such as Underground and rail stations. Good transport links means that higher densities can be supported. Homes in much of the area will be part of mixed use schemes above active ground floor uses. A large area will become a new residential district supplying a substantial proportion of family housing, including dwellings at ground level. At least 25% of all new homes will be family sized, with three bedrooms or more, and 10% will be wheelchair accessible, or easily adaptable for wheelchair users. The borough has a target that 50% of new homes should be affordable. Student accommodation will also feature in the area.

Jobs

2.7 New jobs will be created across a range of sectors including retail, offices, hotels, conference facilities, sports, leisure, tourism, creative industries and educational facilities. Offices and hotels are proposed around Olympic Way. The Wembley industrial estate will continue to be protected for business uses. There will be a small release of land from the Strategic Industrial Land designation and a realignment of that boundary to Second Way.

Shops

2.8 Retail floorspace will be located in an extended Wembley town centre which will connect the existing centres of Wembley and Wembley Park. The new designer outlet centre, next to the

Hilton hotel, includes around 85 shops, restaurants and cafés, and a nine screen cinema. A new pedestrian and cycle priority boulevard will create a link through the heart of the growth area to a new shopping street north of Engineer's Way.

Leisure

2.9 Additional leisure facilities will help create a destination for visitors to complement the existing uses such as the stadium, refurbished Wembley Arena and Fountain TV studios. New uses include a new multiplex cinema. Leisure, tourism and cultural uses will be located in the town centre or in the Strategic Cultural Area near the Stadium.

Civic Centre

2.10 Brent's new Civic Centre when open will bring together the many services of Brent Council under one roof, incorporating a state-of-the-art modern library and a range of civic and community spaces. The new Civic Centre will be located on Engineers Way, adjacent to Arena Square and Wembley Arena and will be an important destination for local people. It will provide the impetus and opportunity for further public services to locate here and could help stimulate a high quality office market.

Nature

2.11 New open spaces, landscaping and a minimum of 1,000 trees will be delivered as part of developments. The council will also seek the re-naturalisation of the River Brent and Wealdstone

Strategic Planning Context 2

Brook where possible. Flood risk has been taken into account when developing the plan and mitigation measures will form part of all developments in areas at risk of flooding.

Transport

2.12 Travel by foot, cycle and public transport will be promoted in Wembley by prioritising these modes of travel into and throughout the area whilst maintaining good vehicle access on designated routes. A hierarchy of routes will be established to facilitate access by foot, cycle, public transport and vehicles. Pedestrian permeability will be encouraged throughout. A new route for pedestrians and cyclists will link two of the three Wembley stations through the extended town centre along the new Boulevard and Olympic Way. There are opportunities to encourage cycling through Cycle Hubs and by linking new local routes to the wider cycle network. Key corridors and junctions will be upgraded and legibility will be improved through the creation of gateways into the area. Wembley's accessible location provides the basis for aiming to reduce the share of journeys by car.

Priorities for Investment

2.13 Priorities for infrastructure investment in the Wembley Growth Area include open space, play facilities, accessibility and cycling routes, wildlife enhancements, health, schools and community facilities. These are set out in the council's Infrastructure and Investment Framework (IIF). This document is subject to regular review.

2.14 The AAP also sets out priorities for developer contributions, appropriate to the scale of the proposed development that would normally be secured through planning obligations. Essential requirements include flood mitigation, transport improvements and affordable housing. Developers will also be encouraged to provide low-cost business start-ups, public realm improvements, public art, and connection to a decentralised energy system, particularly in view of the introduction of the Community Infrastructure Levy.

2.15 Delivery of these investment priorities is dependent on resources and viability. Major infrastructure will be delivered through the Community Infrastructure Levy mechanism, and the IIF includes opportunities for funding sources to complement CIL contributions. Priorities for contributions to infrastructure investment will be considered on a site by site basis. The council will work closely with delivery partners such as developers, Greater London Authority and Transport for London.

2.16 The Community Infrastructure Levy (CIL) will be applied on development from 1st July 2013. It is the council's intention to produce a Strategic Infrastructure Plan (SIP) that will set out infrastructure requirements, sources of funding including CIL and then prioritise their delivery. This will take the IIF, which sets out all likely infrastructure needs and turn it into a deliver strategy. The SIP will prioritise infrastructure delivery over time for all of the growth areas.

Because funding and priorities change over time it is considered sensible to put this in a separate document that can be more regularly updated.

Timescales and Delivery

2.17 The Wembley Area Action Plan identifies 31 sites for redevelopment over the next 15 years. The council is working closely with key stakeholders who will help deliver the Plan, including major landowners and developers. Transformational change is already well underway.

2.18 As the Plan is being published there is already permission for more than 5,000 residential units together with new retail, offices, leisure, student accommodation and hotel uses. In 2012 new homes, student accommodation, a health facility and a number of hotels, such as the four star Hilton, were already built. In 2013 the London Designer Outlet Centre, cinema and Civic Centre will be completed. Into the medium-term, development is more likely to take place in the north west of the area, subject to economic conditions.

2.19 By 2030 Wembley will be have become the economic engine for Brent and a key contributor to the London economy. It will be a sustainable, lively and distinctive destination, exploiting its excellent public transport and links. Building upon its international brand for sport with Wembley Stadium at its heart, a thriving city quarter will be developed, generating a new identity for the borough, a national and international destination, a key contributor to the London economy and the beating heart of the London Borough of Brent. It will be a world class

2 Strategic Planning Context

~~destination, a beacon of sporting and architectural excellence and will boast a comprehensive range of high quality hotels, leisure, commercial, residential and retail activities all in a contemporary, lively and distinctive setting.~~

Policy Context History of the Area

2.20 4.5 Wembley has a tradition of masterplanning and design. The 1924 Empire Exhibition layout introduced a strong formal character to the area. A broad avenue was established on a north-south axis from Wembley Park Railway Station to the Empire Stadium. Cutting across this route was a large rectangular lake and garden/park running on an east-west axis.

2.21 The Empire Exhibition closed in 1925 and subsequent development has slowly moved away from the Exhibition layout. The historic east-west grain is still in evidence, particularly along Engineers Way and Fulton Road but the park has been lost and the formal ceremonial route to the Stadium – Olympic Way – has no sense of enclosure.

2.22 Although there have been many significant improvements in the Wembley area over recent years, the general pattern of development over the last 80 years has removed any clear sense of urban form across the area. The Stadium area is currently functionally disconnected from the High Road and surrounding residential development by two railway lines at the north and south that converge in the east.

2.23 The Wembley Industrial Estate, located to the east of the Stadium, consists of a number of smaller industrial estates of differing ages and forms. The dominance of heavy industrial uses and the presence of 'bad neighbour' activities means that the area has never been well integrated with the residential, retail and leisure uses that surround it. The area has a poor quality environment with many underused sites and premises that turn their backs on the Stadium.

2.24 Wembley Town Centre, at its height in the 1960's, is the product of years of decline, and the gradual loss of major retailers created a limited shopping environment. However, recent improvements to the public realm and the approval and build out of a series of large scale schemes have added to the climate of change in Wembley. The town centre is now experiencing higher development pressures but this is generally occurring on a piecemeal, ad hoc basis.

Planning Context

2.25 A key requirement of local plans, such as the Area Action Plan (AAP), is that they must conform with national and regional planning policy. The key policies are contained in the National Planning Policy Framework published in March 2012 and the London Plan adopted in July 2011. The relevance to planning policy in Wembley is explained in individual sections of the AAP.

National Planning Policy Framework

2.26 The new National Planning Policy Framework (NPPF) sets out national planning policy and provides general guidance on a wide range of planning matters. Of general importance is the introduction of a presumption in favour of sustainable development.

Presumption in favour of sustainable development

2.27 When considering development proposals, the council will take a positive approach that reflects the presumption in favour of sustainable development. It will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

2.28 Planning applications that accord with the policies in this Plan will be approved without delay, unless material considerations indicate otherwise.

2.29 Where there are no policies relevant to the application, either within this Plan or other relevant and up-to-date plans for the area, then the council will grant permission unless material considerations indicate otherwise – taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh

Strategic Planning Context 2

- the benefits, when assessed against the policies in the NPPF taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted.

London Plan

2.30 The AAP must be in general conformity with the London Plan. Wembley is important in helping to ensure that London "retains and extends its global role as a sustainable centre for business, innovation, creativity, health, education and research, culture and art and a place to live visit and enjoy..." (policy 2.1 of the London Plan). There are a number of strategic policies and designations that are particularly pertinent to Wembley. These key policy areas are summarised below:

- London - Luton - Bedford Co-ordination Corridor (2.3) - Wembley forms part of this corridor, where there should be co-operation between authorities to deliver infrastructure needed to support development.
- Opportunity Area (2.13) - Wembley is one of 43 Opportunity Areas identified across London with an indicative employment capacity of 11,000 new jobs and where a minimum of 11,500 new homes can be delivered.
- Strategic Outer London Development Centres (2.16) - Wembley is identified as a potential Strategic Outer London Development Centre with a strategic function of greater than sub-regional importance for leisure/tourism/arts/culture/sports. This

includes bringing forward adequate development capacity.

- Strategic Industrial Locations (SIL)(2.17) - Wembley and Neasden industrial estates are designated as SIL which are the main reservoirs of industrial and related capacity.
- Arts, Culture, Sport and Entertainment (4.6) - Wembley is identified as one of nine Strategic Cultural Areas which are London's major clusters of visitor attractions.

2.31 Relevant strategic policy within the London Plan is also referred to in each topic chapter.

Brent Core Strategy

2.32 The Core Strategy, adopted in July 2010, is the spatial strategy for the development of the borough as a whole and was prepared with regard to national planning policy and the London Plan in force at the time. Although the NPPF has been published and a revised London Plan adopted since the Core Strategy was prepared, the council considers that the Core Strategy remains fundamentally in conformity with these documents. The Core Strategy, therefore, continues to provide the main planning policy context for the preparation of more detailed policies and proposals in the Area Action Plan. The key objectives from the Core Strategy that are important for Wembley have been set out in the following section on 'Vision and Objectives for Wembley'. The spatial context provided by the Core Strategy for the AAP are also explained in each section of the Plan.

3 Vision and Objectives for Wembley

3.1 It is important that the council has a realistic vision as to what Wembley should be like in 15 years time. The council's vision for the growth area was launched in 2002 in the document "Our Vision for Wembley, it was refreshed in 2007 with the launch of the "Vision to Reality" document and updated for the AAP.

Vision

Wembley

A new place, a new home and a new destination - modern, urban, exciting and sustainable. At its core will be a comprehensive range of leisure and commercial facilities, exploiting excellent public transport connections to the rest of London and the United Kingdom, all in a contemporary, lively and distinctive setting. Wembley will have a modern, service based economy. Hotels, restaurants, offices, shops, leisure uses, creative industries and an array of other businesses will provide thousands of new jobs and meet the needs of both visitors and local residents. All of Wembley will be well connected, with a new pedestrian boulevard linking Wembley Park to the High Road.

Objectives

3.2 The objectives for Wembley build on the vision for the area, setting out in more detail how the council aims to achieve the vision. The objectives are drawn from the Core Strategy and are shown below by theme.

Regeneration through leisure, sport and mixed use development

- To promote the regeneration of the area for sporting, leisure, tourism and mixed-use development, including the provision of at least 11,500 new homes between 2010 and 2026, so that Wembley is developed as a major visitor destination as well as a major new community.
- To complete three large scale hotels in the Wembley area and one large regional visitor attraction.
- To increase newly approved retail floorspace in Wembley by 25%.
- To ensure that the local community benefits from development, including training and access to 10,000 additional full-time jobs created by 2031.

Town centres, shopping and existing and new uses

- To ensure that the development around the National Stadium is compatible and co-ordinated with regeneration proposals in the surrounding area, and that Wembley town centre, the main focus for new retail and town centre uses in the borough, is expanded eastwards into the Stadium area.
- To enhance the vitality and viability of Wembley's town centres by maintaining their position in the retail hierarchy and maintaining a range of local services.

Modern, service based economy

- Generate 10,000 jobs across a range of sectors including retail, leisure, office and other businesses.
- Increase the supply of modern subsidised workplace developments for the arts and creative industries.
- Ensure sufficient sites and premises are available for commercial activity and that industrial/ warehousing floorspace is renewed.

Promoting Wembley as a global and distinctive tourist destination

- To provide a world class setting for a world class Stadium by creating a distinctive place with high quality building design and a positive sense of identity that is sustainable and enables progress to a low carbon future.
- Promoting new public art to support regeneration.

People's needs and associated infrastructure

- To meet social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health and community facilities.
- To provide community facilities to meet the needs of Brent's diverse community.
- To promote sports and other recreational activities by placing particular emphasis on the provision of new facilities to address

Vision and Objectives for Wembley 3

existing deficiencies and to meet the needs of new population.

- To promote healthy living and create a safe and secure environment.

Housing Needs

- To achieve housing growth and meet local housing needs by promoting development that is mixed in use, size and tenure.
- To achieve 50% (approx.) of new housing as affordable.

Promoting improved access and reducing the need to travel by car

- To create a well connected and accessible location where sustainable modes of travel are prioritised and modal share of car trips to Wembley is reduced from 37% towards 25%.
- To ensure that the infrastructure of Wembley is upgraded so that it supports new development and meets the needs of the local community.
- To complete first class retail and other facilities in Wembley that reduces the need to travel to other centres and improving key transport interchanges.
- To promote access by public transport, bicycle or on foot and reduce car parking standards because of Wembley's relative accessibility.

Protecting and enhancing the environment

- To preserve open spaces for recreation and biodiversity and create new and enhanced

open spaces to address deficiencies where possible, but particularly to meet the needs of additional population commensurate with current levels of provision.

- To increase the amount of public open space (at least 2.4ha within Wembley) and the amount of land with enhanced ecological value.
- To enhance green and blue infrastructure by tree planting, returning rivers to their more natural courses and mitigating the pollution effects of development.
- To achieve sustainable development, mitigate and adapt to climate change.
- To reduce energy demand from current building regulation standards and achieve exemplar low carbon schemes and combined heat and power plants.

4 Urban Design & Place Making

Strategic Policy

4.1 The London Plan section on London's Living Spaces and Places provides the strategic context for urban design and place making in Wembley. Policies 7.1 to 7.8, dealing with matters such as building communities, design, local character, public realm, architecture, the location and design of tall buildings and heritage assets, are particularly pertinent. For example, policy 7.7 states that tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations.

4.2 Brent's Core Strategy also includes policies which deal with urban design, place making and the public realm. Policy CP5 states that in considering major development proposals, regard shall be had to the contribution towards the creation of a distinctive place with a positive sense of identity which is well connected and accessible. Consideration should also be given to the heritage of the area and the means of introducing continuity through urban design measures should be investigated as well as the possibility of reusing and restoring buildings of merit.



Picture 4.1 Wembley Arena is an example of a historic building that has been successfully revitalised

4.3 Policy CP6 deals with density and tall buildings and states that where design is of the highest or exemplary standard, higher densities will be considered. Higher densities may be acceptable where PTAL levels would be raised as a result of development or through committed transport improvements. Sites should contribute towards wider public realm improvements commensurate with the scale of development and development in growth areas should take into account the suburban interface. Tall buildings are acceptable in the Wembley Growth Area.



Picture 4.2 Central Square Development

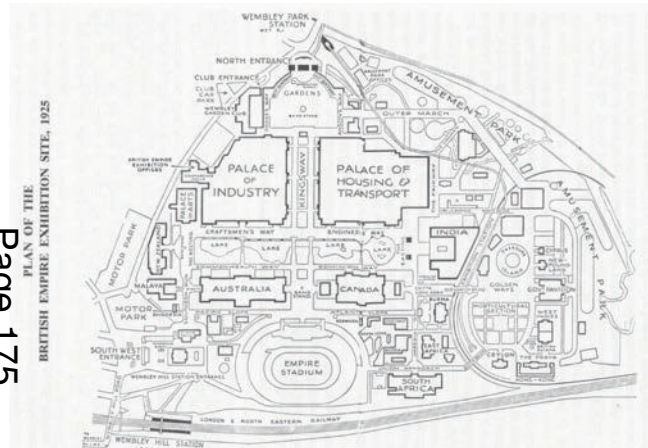
4.4 Policy CP7 states that Wembley will drive the economic regeneration of Brent and that it will become a high quality, urban, connected and sustainable city quarter. Wembley town centre will be extended eastwards.

4.5 Given that Wembley is an area where suburban residential development interfaces with a much more urban character of development it is

Urban Design & Place Making 4

important to consider Policy CP17 which states that the suburban character of Brent will be protected from inappropriate development.

Policy Context Local Character



Picture 4.3 Plan of British Empire Exhibition

4.6 Wembley has a tradition of masterplanning and design. The 1924 Empire Exhibition layout introduced a strong formal character to the area. A broad avenue was established on a north-south axis from Wembley Park Railway Station to the Empire Stadium. Cutting across this route was a large rectangular lake and garden/park running in an east-west axis.

4.7 The Empire Exhibition closed in 1925 and subsequent development has slowly moved away from the Exhibition layout. The historic east-west grain is still in evidence, particularly along

Engineers Way and Fulton Road but the park has been lost and the formal ceremonial route to the Stadium — Olympic Way — has no sense of enclosure.

4.8 Although there have been many significant improvements in the Wembley area over recent years, the general pattern of development over the last 80 years has removed any clear sense of urban form across the area. The Stadium area is currently functionally disconnected from the High Road and surrounding residential development by two railway lines at the north and south that converge in the east.

4.9 The Wembley Industrial Estate, located to the east of the Stadium, consists of a number of smaller industrial estates of differing ages and forms. The dominance of heavy industrial uses and the presence of 'bad neighbour' activities means that the area has never been well integrated with the residential, retail and leisure uses that surround it. The area has a poor quality environment with many underused sites and premises that turn their back on the Stadium.



Picture 4.4 Wembley Stadium & Industrial Estate

4 Urban Design & Place Making



Picture 4.5 Wembley High Road

4.10 ~~Wembley Town Centre, at its height in the 1960's, is the product of years of decline, and the gradual loss of major retailers created a limited shopping environment. However, recent improvements to the public realm and the approval and build out of a series of large scale schemes have added to the climate of change in Wembley. The town centre is now experiencing higher development pressures but this is generally occurring on a piecemeal, ad hoc basis.~~

Buildings of Historic or Architectural Merit

4.11 Historic buildings and areas provide a depth of character to the urban experience that cannot be underestimated. They provide continuity and connection with an area's past ~~provides the building blocks for~~ which helps establish the developing local identity and ~~establishing a unique character in~~ of an area.

4.12 The Plan area ~~does not have a significant amount of historic buildings or buildings that are considered to be of an exemplary architectural quality. There are~~ contains five four buildings within the area that are considered to have significant historic or architectural merit (shown on Map 4.1):

- Church of St John – ~~Grade II~~ Originally constructed in 1846 this flint building with stone dressings was designed in the Early English style (Grade II). The front boundary wall and lynch gate of St John's Church has a separate (Grade II) listing. It is a brick structure, contemporary with the church, with decorative cast-iron boundary railings on a dwarf wall with a picturesque wooden lych-gate to the main road. Any new development within the vicinity of this building should consider how the use of materials and architectural detailing responds to the historic character of the building.
- St Andrew's Presbyterian Church, Ealing Road – A former Presbyterian church built in 1904, in a style strongly influenced by the Arts and Crafts manner. Currently in use as a Mosque (Grade II). New development must not detract from the key role that this building plays within the streetscape.
- The Empire Pool (Wembley Arena) - Designed by Sir E Owen Williams and built in 1934, it has a reinforced concrete frame which was the largest concrete span in the world at that time. The original pool was 200 feet long and 60 feet wide and was used for the 1948 Olympic Games. The building has recently been refurbished and is currently predominantly utilised as an entertainment venue (Grade II). The building has an important role due to its historic associations, its location at the heart of the regeneration area, and its associated public space (Arena Square). Development in close proximity to the Arena must be designed to respect the scale, proportions and materiality of the building.
- Brent Town Hall - Built in 1935-40 as Wembley Town Hall to designs by Clifford Strange. It is a brick-clad steel frame building expressed in T-shaped plan set around central entrance hall with a Scandinavian style 3-storey front (Grade II). Given the role that this building has historically played within the borough along with its highly visible location and attractive

Urban Design & Place Making 4

landscape setting, any new development, extensions or alterations must seek to preserve or enhance the existing building.

- Wembley National Stadium – Designed by Foster & Partners, the building was completed in 2007. Although not Statutorily Listed the building is nationally and internationally recognised for its iconic arch. Due to the defining role that the stadium plays across the AAP area, the council will seek to preserve its imposing presence through the sensitive scaling of surrounding buildings in line with the approved Quintain Stage 1 development and the 2009 Wembley Masterplan SPG.



Picture 4.6 The Empire Pool (Wembley Arena) Grade II



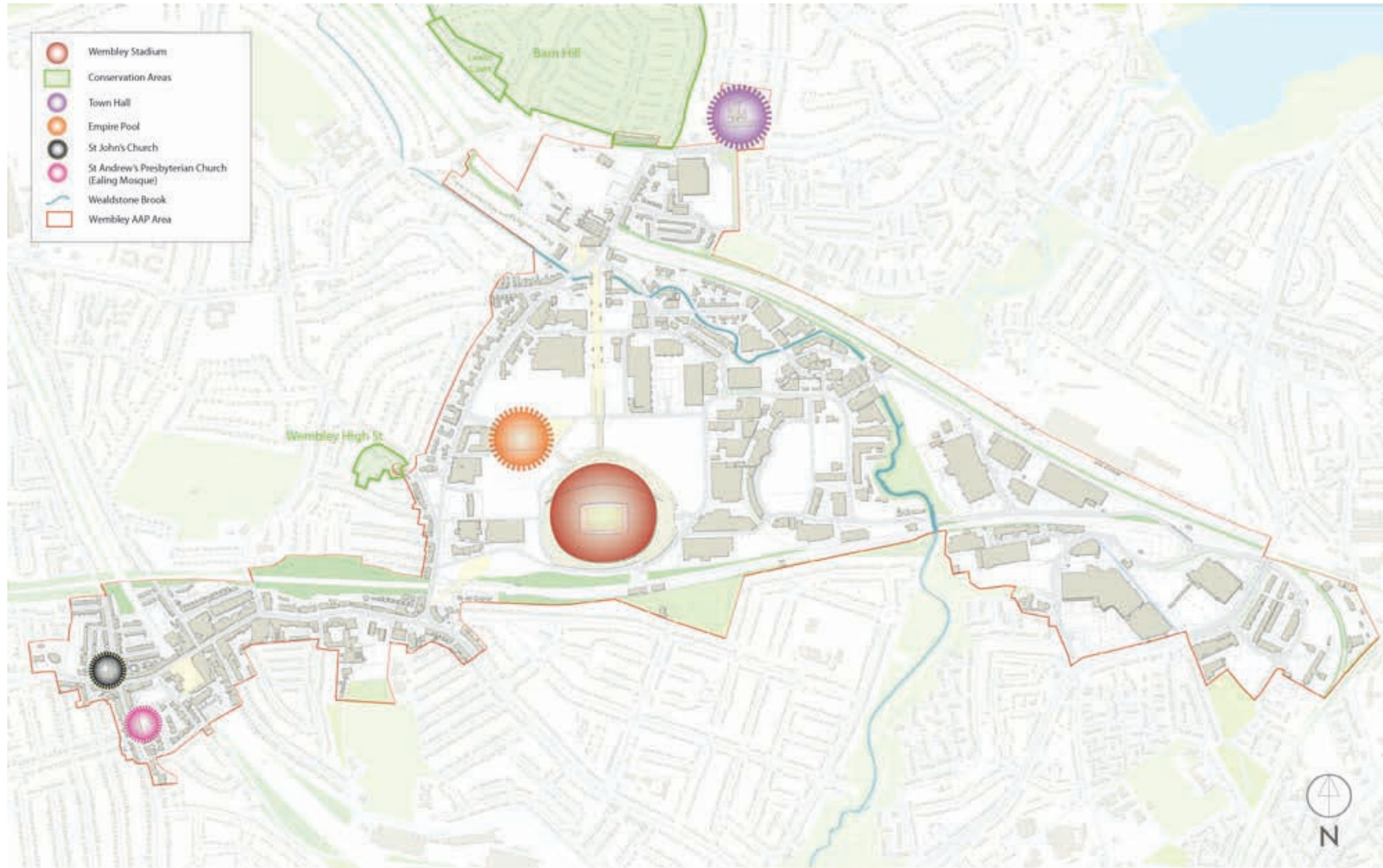
Picture 4.7 Brent Town Hall (Grade II)

4.13 There are two Conservation Areas on the fringes of the plan area (shown on Map 4.1):

- Barn Hill Conservation Area
- Wembley High Street Conservation Area

4.14 As well as development within close proximity to these Conservation Areas, consideration should also be given to the impact on views into and out of these areas.

4 Urban Design & Place Making



Map 4.1 Heritage Assets

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4.15 Although there are only four important buildings in the area, it is the significance of these buildings at a local, regional and national level, and their role in the townscape, that has a real impact on the character and future development of Wembley.

4.16 Although there are few listed buildings in the area, there are a number of locations where a building or a collection of buildings are considered to add to the richness of the urban fabric, for example along Wembley High Road. Any redevelopment proposals will need to fully justify the removal or replacement of such buildings.



Picture 4.8 View of Wembley Stadium from Barn Hill Conservation Area

Regeneration Context

4.17 In 2004 the London Borough of Brent granted outline planning permission to Quintain Estates and Development plc for a major mixed-use regeneration scheme covering 17 hectares of land surrounding the new Wembley Stadium. Much of the approved scheme called Quintain Stage 1 is still to be delivered, including infrastructure required by planning obligations attached to the phased delivery of the development.

4.18 In 2011 permission was granted for a second stage of mixed-use redevelopment to provide up to 160,000m² of floorspace in the area north of Engineers Way, from Olympic Way to Empire Way. It is likely now that the main focus for the Quintain regeneration will remain to the east of the Stadium and Olympic Way.



Picture 4.9 Quintain Estates NW Lands scheme



Picture 4.10 Artist's Impression of New Development on Elizabeth House

4.19 In addition to the major regeneration being brought forward on the Quintain development, there are a number of other large scale developments underway across the Wembley area. Permission has been granted for hotels, residential development, student accommodation, retail and educational facilities, all of which will continue the momentum of change in the area.

4 Urban Design & Place Making

4.20 Brent's new Civic Centre when open will bring together the many services of Brent Council under one roof, incorporating a state-of-the-art modern library and a range of civic and community spaces. The new Civic Centre will be located on Engineers Way, adjacent to Arena Square and Wembley Arena and will be an important destination for local people. It will provide the impetus and opportunity for further public services to locate here and could help stimulate a high quality office market.



Picture 4.11 Image of Brent's New Civic Centre

4.21 By 2030 Wembley will be a national and international destination, a key contributor to the London economy and the beating heart of the London Borough of Brent. It will be a world class destination, a beacon of sporting and architectural excellence and will boast a comprehensive range of high quality hotels, leisure, commercial, residential and retail activities all in a contemporary, lively and distinctive setting.



Picture 4.12 Heavy Industry Located in the East of the Area

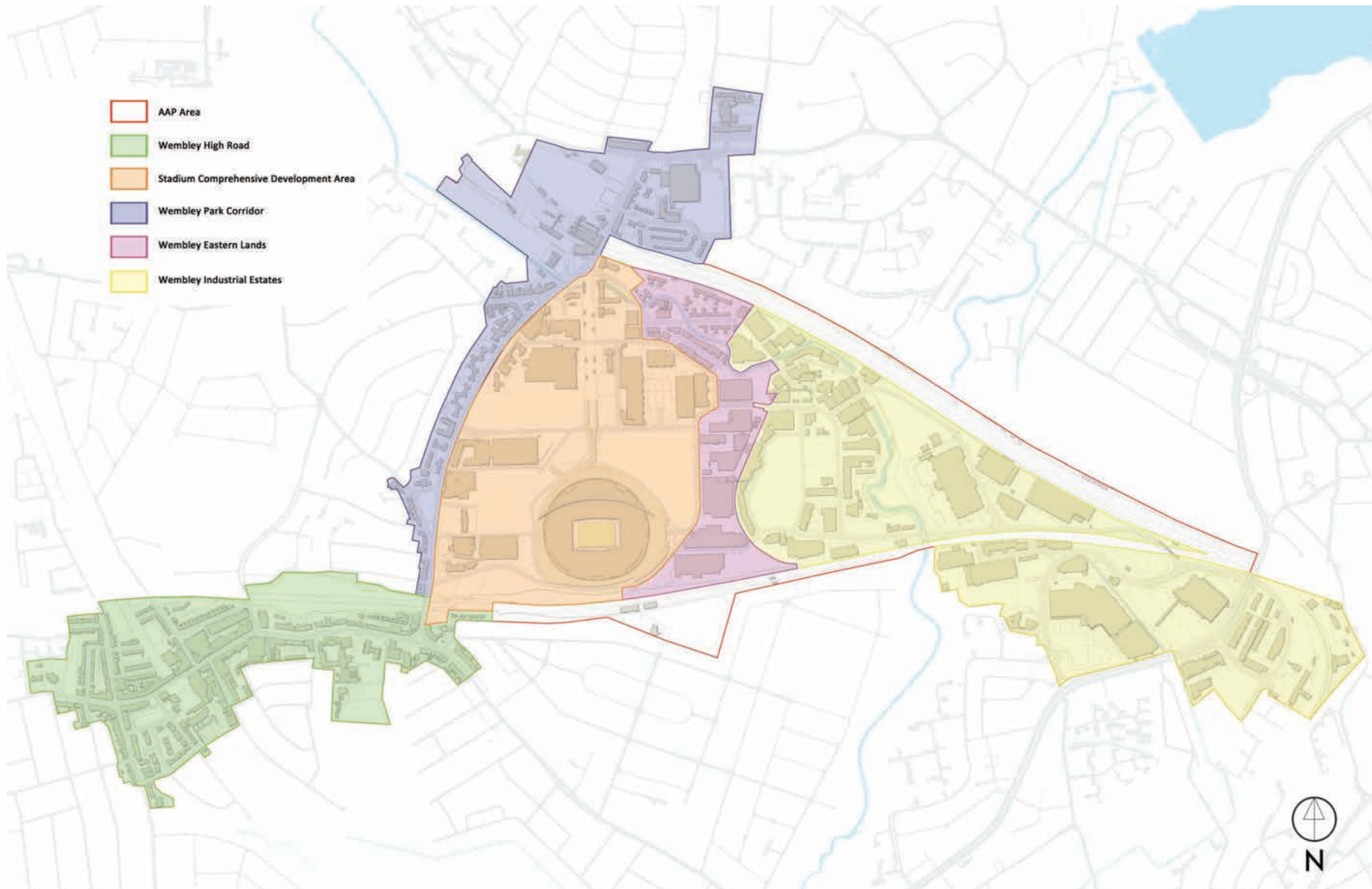


Picture 4.13 New Apartment Blocks in the Quintain Stage 1 Development

Local Character Areas

4.22 The Wembley AAP area has been divided into 5 localities that have broadly distinctive characteristics of building typology, movement infrastructure and urban grain. This provides the basis for understanding the existing character of each area and how to develop this will form the basis for a distinctive identity into the future. The following section will outline the broad principles that should to guide development in each locality and provide an indication of the range of building typologies that the council views as acceptable.

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Map 4.2 Character & Urban Form: The Five Localities

4 Urban Design & Place Making

Wembley High Road



Picture 4.14 Wembley High Road Locality

4.23 The Wembley High Road locality comprises the existing town centre and its immediate context. Although the area developed incrementally since the 1920's, the majority of the High Road frontage development happened post-war.

4.24 The pattern of development is broadly focused on the east-west spine of Wembley High Road with three key junctions (Ealing Road, Park Lane and Wembley Hill Road) which mark out the beginning, middle and end of the town centre and provide a visual narrative to the experience of the area.

4.25 In order to build upon and enhance the existing town centre character of this locality, the council will seek to strengthen the retail frontage on to the High Road, particularly between Park

Lane and Wembley Hill Road. Active ground floor uses will be sought with a range of alternative uses on upper floors.

4.26 Strengthening the connections between the existing town centre and the Comprehensive Development Area around the Stadium will be fundamental in securing the success of Wembley as a whole. Any new development around the Triangle junction (High Road/Wembley Hill Road) must demonstrate how the strengthening of such connections has been considered.



Picture 4.15 Artist's Impression of Wembley High Road



Picture 4.16 Artist's Impression of Residential Development from the Wembley Link SPD

4.27 Given that public transport accessibility is high, the council will support a relatively dense form of residential development, particularly in close proximity to the stations. However, given the existing suburban character around and the significant number of flats already permitted in the area, the council would look favourably on low-rise high density options including houses on sites adjacent to existing suburban areas.

4.28 The council may support development of the Chiltern Cutting sites, but only where the majority of the development is focused to the south of the railway lines and significant measures are taken to preserve the ecological value of the area. There are two supplementary planning documents

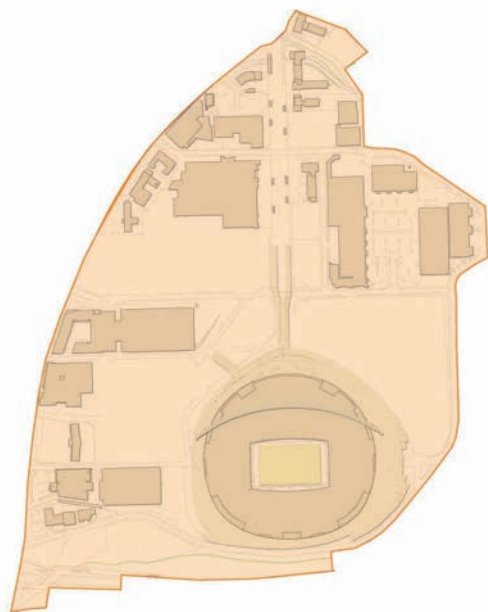
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(SPD) to guide development in the Wembley High Road area: Wembley Link SPD (2011) and Wembley West End (South) SPD (2006).

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Stadium Comprehensive Development Area

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Picture 4.17 Stadium Comprehensive Development Area Locality

4.29 Currently the townscape character of the Comprehensive Development Area offers little in the way of consistency. There are a range of building typologies that have no real relationship to one another and the area currently lacks the appropriate quality for the setting of an international icon such as Wembley Stadium. The grade II listed Empire Pool (Wembley Arena) is one of the most significant historic buildings in Wembley. Given the

scale of planned regeneration it is more appropriate to analyse this area based on the development that has already been permitted.



Picture 4.18 Artist's impression of new public space to be created to the north of the Civic Centre

4.30 The Quintain Stage 1 and NW Lands outline planning permissions will dramatically alter the overall character and urban form of this locality into a much more rigorously planned, dense urban townscape, and a new Civic Centre will create a vibrant civic heart to the north west of this locality.

4.31 Olympic Way will become the principal organising structure of the locality as a grand new public space and processional route for Stadium crowds. It will also serve to delineate areas of slightly differing urban forms. To the west of Olympic Way will be a new shopping street, a

landmark Civic Centre and a new public square, creating a new town centre identity, whilst east of Olympic Way will have a more residential character focused around a newly created park.

4.32 Much of the area is designated as a Strategic Cultural Area where leisure, tourism and cultural uses are particularly encouraged.

4.33 Proposals for new development fronting Olympic Way should reflect the scale and proportions of existing and proposed buildings in order to establish a formal character for this processional route. Any development north of Fulton Road should seek to maintain a regular set back from the principal pedestrian route which has already been established by the existing building lines (Stadium Retail Park & Crescent House).

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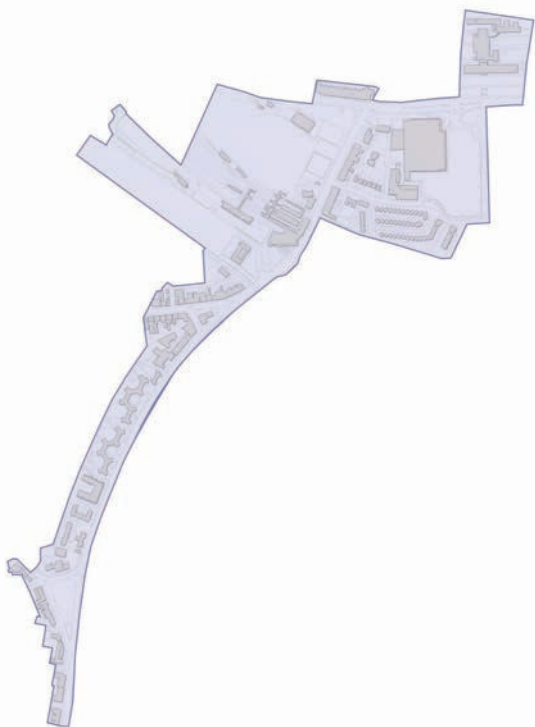
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Picture 4.19 Artist's Impression of Olympic Way

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Wembley Park Corridor

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Picture 4.20 Wembley Park Corridor Locality

4.34 The area designated as Wembley Park Corridor contains a wide variety of building typologies generally organised around the north/south spine of Wembley Hill Road/Empire Way/~~Wembley Park Drive~~ Bridge Road. Although there are a number of key buildings in this locality, Wembley Park Station is the main activity generator and principle focus for the area. Much of this locality

operates as a physical transition in scale from the large format development in the Stadium area to the wider residential suburbia.



Picture 4.21 Wembley Park Station

4.35 The council will seek to strengthen the role of Wembley Park Station as a key gateway into the area and development around the station should reflect this. Given the scale and form of development already approved in the Comprehensive Development Area, it is even more important that this locality operates as a transition in scale and character into the suburban hinterland.

4.36 Development in this locality should seek to create a strong built frontage along the corridor with a range of uses and a consistent approach to the public realm. Although the scale of development should act as a transition between the larger scale of building in the Stadium area and the suburban

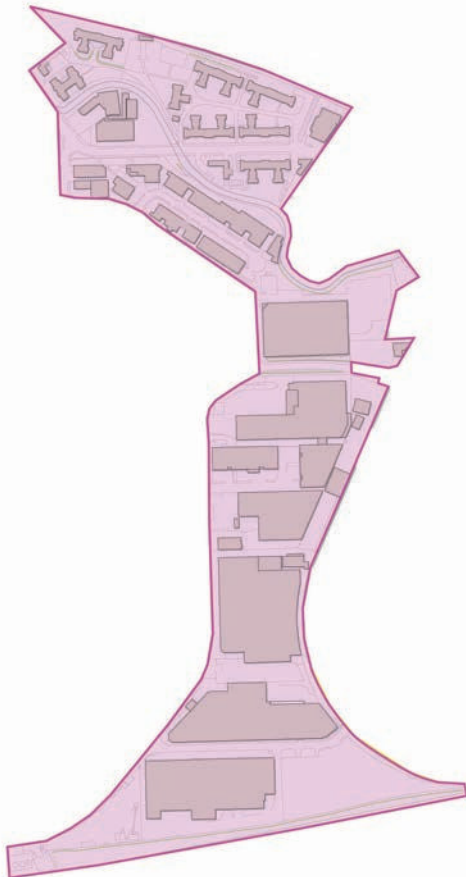
residential context, there are also opportunities to strengthen the role of key nodes through the incorporation of signature buildings and junction improvements.



Picture 4.22 Artist's Impression of Empire Way

Urban Design & Place Making 4

Wembley Eastern Lands



Picture 4.23 Wembley Eastern Lands Locality

4.37 The Wembley Eastern Lands locality lies on the eastern fringe of the Comprehensive Development Area. To the north of the area is Watkin Road – a tight grained, small scale industrial

estate, whilst the remainder of the area is predominantly made up of larger scale industrial uses with some storage and cash and carry. The quality of buildings is generally low with poor public realm.



Picture 4.24 Buildings at the south of the Wembley Eastern Lands Locality

4.38 The aspiration for this area is to introduce a wider variety of uses in order to provide a careful transition from the broader offer of mixed used development in the west, through to the Strategic Industrial Locations in the east. Much of the area

is designated as a Strategic Cultural Area where leisure, tourism and cultural uses are particularly encouraged.



Picture 4.25 Artist's Impression of Wembley Eastern Lands

4.39 There should also be a transition in scale from the larger scale development around the Stadium to the lower rise industrial buildings in the Strategic Industrial Locations. There may be opportunities for taller development to enhance legibility at key locations.

4.40 The council will support proposals that enable greater east-west movement by increasing the permeability between blocks.

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Wembley Industrial Estate



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Picture 4.26 Wembley Industrial Estates Locality

4.41 The Wembley Industrial Estate has an important regional and local function, offering a Strategic Employment Location for London and providing valuable jobs for the existing and future residents of Brent. It is the eastern gateway to the AAP area and the primary vehicular access to the Stadium.

4.42 The buildings range in typology and scale, including large scale retail units near the North Circular Road, but are predominantly large footprint industrial units. The public realm is traffic dominated with an extremely poor pedestrian experience. Brent River Park runs through the area but is difficult to find and is thus under utilised as a valuable resource for the area.



Picture 4.27 View of Stadium from the Wembley Industrial Estate

4.43 Due to its designation as a Strategic Industrial Location much of the area will remain in employment uses. The council will seek improvements to the overall quality of development with more efficient use of plots enabling higher employment densities and buildings that address the streets more appropriately.

4.44 As one of the key entrance points to the area the council will seek significant enhancements to the public realm, primarily through incorporation of soft landscaping and tree planting. Any opportunity to enhance the visibility of the Brent River Park through creation of better connections and safe, legible access will be supported.



Picture 4.28 Artist's Impression of Wembley Industrial Estates

Urban Design & Place Making 4

Character & Urban Form

4.45 Across the AAP area there are a variety of different urban conditions that have evolved as a number of distinctive localities. Although in close physical proximity, currently the areas are functionally disconnected from one another and, other than the Stadium, there is nothing which defines Wembley as a whole. Policies elsewhere in this Plan, such as Gateways, Public Realm and transport will help address this.

4.46 The vast amount of development already undertaken or given permission in Wembley is of a similar large scale and typology (larger blocks of predominantly 1 & 2 bed flats). The area near the Stadium is being transformed into a high density urban destination, with taller buildings and a mix of uses. Other areas, such as the Strategic Industrial Location, will not experience such significant change during the Plan period. Wembley town centre will provide both continuity, by maintaining its role and function as a Major Centre, and contribute to a new local character, for example along the new pedestrian and cycle priority route.

If Wembley is to genuinely become an attractive and sustainable mixed-use district of London it is vital that it can offer residents and visitors a range of facilities, attractions and accommodation in a variety of urban settings.

WEM 1**Character and Urban Form**

Development within each Wembley character area should ~~seek to reinforce and emphasise~~ have regard to the broad development principles set out above for distinctive character of each locality through well considered building and public realm design.

Development should seek and exploit opportunities to whilst strengthening the connections between each of the areas.

The council will require planning applications for development affecting buildings of historic or architectural merit to demonstrate how proposals will conserve their significance and setting.

A Legible Wembley Gateways

Picture 4.29 An example of clear signage in the AAP area

4.47 Gateways increase legibility in an area by providing a recognisable point of entry. Wembley attracts many first-time visitors and it is important to create a comprehensible area for those arriving by public transport, foot, bicycle and road. The principle gateways into Wembley are shown on Map 4.3; these are Wembley Central Station, Wembley Stadium station, Wembley Park Station and the entry to the industrial estate from the North Circular Road. The junction at Engineers Way and Olympic Way is also an important node in terms of legibility. Architecture and public realm design should reinforce the role of these gateways and nodes as important elements of the urban experience. New development should contribute to a sense of arrival and legibility of the area.

4 Urban Design & Place Making

Three Stations

4.48 In order to create distinctive, safe and attractive arrival points into Wembley, Brent Council has pursued a 'Three Stations Strategy' that has seen the transformation of Wembley's three stations to ensure visitors are able to arrive and depart quickly and comfortably, whilst minimising potential negative impacts on local residents and businesses.

4.49 Improvements include:

- A major refurbishment and extension of Wembley Park Station completed in 2006, increasing its capacity to 37,000 passengers per hour on Stadium event days.
- The iconic White Horse Bridge and a new public square at Wembley Stadium Station, completed in 2006, designed to link the Stadium and its surrounding regeneration area with the existing town centre.
- Modernisation of Wembley Central Station as part of a large mixed use development that has seen the creation of a new public square and lively heart to the town centre (improvements ongoing).



Picture 4.30 Wembley Park Station

4.50 The work undertaken to date on the three stations has made a genuine difference to the perceptions of the area. Although there have been significant improvements to the three stations, there still needs to be more work undertaken at these arrival points, particularly Wembley Stadium Station. The council will continue to prioritise and improve these gateways through policies such as WEM17 (Walking and Cycling) and WEM3 (Public Realm).

Arrival by foot/bicycle

4.51 The strategy for walking and cycling in the area is set out at WEM17. Gateways can help improve the pedestrian and cyclist experience of the area by providing a landmark and focal point, an aid to navigation and orientation, safe cycle parking, and areas for meeting and resting.

4.52 The key focal points for pedestrians are the three stations and the node at the junction of Olympic Way and Engineers Way. Once the Wembley Boulevard (shown on Map 13.1 and key diagram) is complete, a pedestrian priority spine will run through the heart of the area - from Wembley Park Station (via Olympic Way) to Wembley Stadium Station (via Wembley Park Boulevard) and on into the town centre and Wembley Central station. The junction of Olympic Way and Engineers Way has been highlighted as a Principal Gateway node due to its central location and potential role in linking together the currently disparate areas of Wembley. This will of course ~~only be realised~~ be reinforced if an appropriate alternative to the ~~Pedway~~ pedestrian ramp is delivered (see para 6.35).

4.53 While cyclists mostly access the area by road, there will be greater permeability into the area along this pedestrian and cycle priority route. Some of the key gateways will be appropriate for cycle hubs (see WEM17) and as nodes for connections to the wider strategic cycle network.

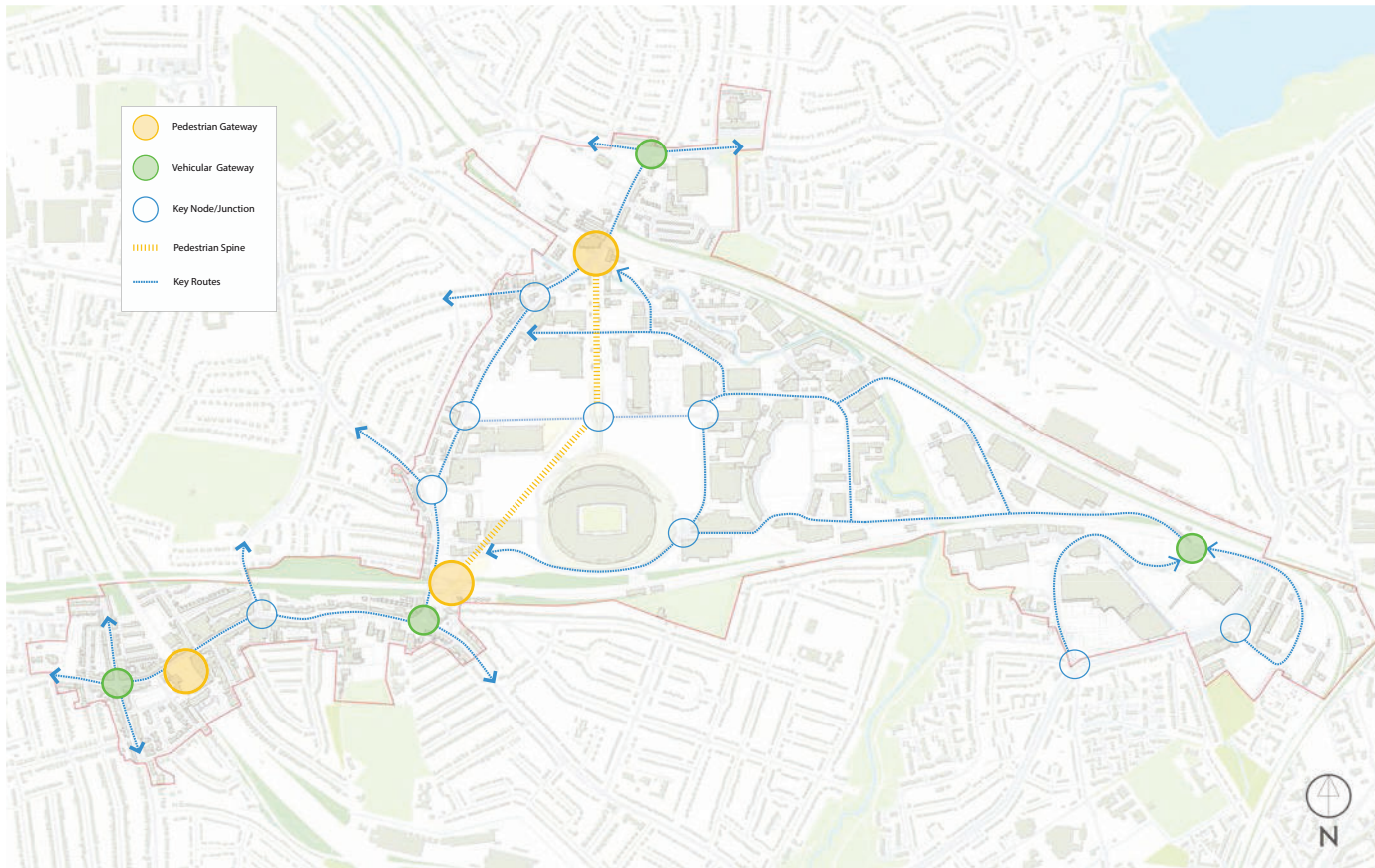
Urban Design & Place Making 4



Picture 4.31 Great Central Way towards South Way, known as the Stadium Access Corridor

4.54 ~~As well as improving the public transport infrastructure, a two-way tidal carriageway linking Wembley Stadium with the North Circular Road has been created for most of the route and, although the improvements have significantly eased traffic flows on event days, there is still no real sense of arrival when entering Wembley from the east.~~

4 Urban Design & Place Making



Map 4.3 A Strategy for Gateways

Urban Design & Place Making 4

A Strategy for a Legible Wembley

Picture 4.32 View of the Stadium from the White Horse Bridge

region, the council will continue to focus on the three stations as hubs of activity and foci for development in the area.



Picture 4.33 View of Wembley Stadium from the east

Arrival by Road

4.55 However, a significant amount of people (on both event days and non-event days) arrive in the area by bus, car or other modes of road transport and the experience of coming to Wembley should equally cater for these people. The Plan's approach is one which balances the need to discourage car use by prioritising walking, cycling and public transport whilst ensuring that the area is accessible to traffic such as event-related coaches, waste collection and delivery vehicles, emergency services and disabled drivers (see 6.8). Given the scale of planned regeneration, the desire to create a sustainable mixed-use community and the relative ease of access to the wider London

4.56 As well as improving the public transport infrastructure, a two-way tidal carriageway linking Wembley Stadium with the North Circular Road has been created along most of the route and, although the improvements have significantly eased traffic flows on event days, there is still no real sense of arrival when entering Wembley from the east.

4.57 Given the scale of planned regeneration, the desire to create a sustainable mixed-use community and the relative ease of access to the wider London region, the council will continue to focus on the three stations as hubs of activity and foci for development in the area.

4.58 Although some significant improvements have been made, access into Wembley by road, particularly from the North Circular Road (A406) lacks any real sense of identity or arrival. Given that the eastern area will remain focused on employment uses, the principal means for improving legibility and public perception of the area will be to improve the public realm and way finding throughout the industrial estate. Opportunities for new development to enhance main routes into and through the area should be exploited. The quality of development along key routes and the potential to enhance important junctions will be given significant weight when considering applications in these locations.

WEM 2**Gateways to Wembley**

The enhancement of nodes around key junctions will be sought, particularly to the east of the AAP area. Architecture and public realm design should seek to reinforce the role of these gateways and nodes as important elements of the urban experience.

Any new development around the Triangle junction (High Road/Wembley Hill Road) must demonstrate how the strengthening of connections through the area has been considered.

4 Urban Design & Place Making

Development at principal gateways and key nodes will be expected to add to the sense of arrival and legibility of Wembley.

The quality of development along key routes will be given significant weight when considering applications in these locations.

Urban Design & Place Making 4

Public Realm: Places for People



Picture 4.34 Wembley High Road

4.59 The public realm strategy for Wembley centres on the legibility of the pedestrian and cycle priority route which runs between the three station gateways, and connectivity between different character areas. To ensure a high quality public realm, the council will apply London Plan public realm policies when considering applications for new development.

4.60 Public realm improvements are essential to improving the urban environment. The Wembley Masterplan identifies a number of public realm aims which development proposals should incorporate into the design, where practicable. These are:

- De-cluttering and rationalisation of street furniture
- Widening of footways
- Legible signage
- Placing street lighting on buildings, subject to preserving residential amenity
- Removal of unnecessary barriers to pedestrian and cycle movement
- Tree planting in the vicinity of new development, where possible.
- Integrating existing natural assets into the new streetscape, where possible
- Public toilets and services should be fully integrated into design of public realm
- Public realm should include places for people to linger, rest and socialise

4.61 The legibility of the pedestrian and cycle priority route from Wembley Park station along Olympic Way and the Boulevard to Wembley Stadium station, across White Horse Bridge and the Triangle junction, and down Wembley High Road to Wembley Central station will be delivered substantially through a consistent approach to the public realm design, including hard and soft landscaping, signage and street furniture.

4.62 ~~It is envisaged that the design philosophy for the public realm could reflect local character and the land uses of a specific AAP area, rather than an area-wide corporate signature. Street paraphernalia should be kept to a minimum and, where possible, grouped and/or rationalised to minimise its cumulative impact on the public realm.~~

4.63 Wembley requires a safe, connected and inclusive public realm which reduces the need for physical barriers for pedestrians and cyclists (see WEM17). The relationship between pedestrian and vehicular circulation will have to be carefully designed to enable pedestrian predominance and movement. Shared space similar to Home Zones can be used to improve the public realm and environment for pedestrians. Shared space will only be appropriate in areas that have low levels of traffic, such as the new residential district (Site W18). It will not be supported in through-routes. High quality public realm around key gateways and nodes will be particularly important in creating better connections between the different character areas of the Plan area. Shared surfaces and dual use surfaces similar to Home Zones will be encouraged, particularly in residential locations.

4.64 ~~The council will seek to reduce the need for physical barriers and let the quality and character of spaces control circulation, speed and direction. Safety through consideration, rather than regulation, will be the guiding principle. Vehicular speeds could be significantly reduced through passive measures rather than relying upon barriers, high kerbs and~~

4 Urban Design & Place Making

excessive signage. Consideration will be given to the removal of existing barriers to pedestrian movement wherever possible.



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Picture 4.35 Street trees can dramatically enhance the urban environment

4.65 The Core Strategy sets a target of planting 1,000 trees in the Wembley Growth Area and these will mainly be delivered through developer contributions. Street trees and other planting offer an opportunity to create a local character by the careful selection of complementary species relative to their setting and location. Choosing the right tree for the right place is vital as urban streets are hostile places and plants can suffer from vandalism, vehicle damage, wind damage, drought, water logging, sun scorch. Large buildings also cause a micro climate altering rain patterns and buffering and tunnelling winds.

4.66 Trees require as much soil rooting volume as possible which creates various problems when competing with underground services. Where

possible, new development should exploit opportunities to run utility services in common channelling, leaving adequate space for tree planting.

4.67 Species selection should be made in consultation with the council's tree officer. The council will encourage the use of more mature specimens to accelerate the greening of existing hard urban environments.

WEM 3

Public Realm

~~Public realm improvements will be sought that reflect local character as an integral element of proposals for new development.~~

The council will seek a consistent approach to the public realm along the pedestrian and cycle priority route between the three station gateways.

New development will be expected to contribute to connectivity in the area through public realm improvements at key nodes and junctions.

The council will require development to contribute to new tree planting.

Urban Design & Place Making 4

Public Art: A Creative Urban Environment

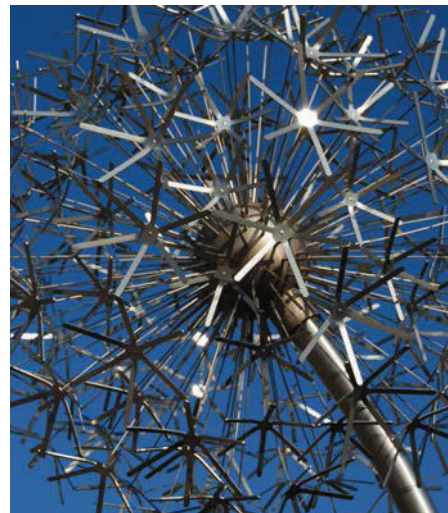


Picture 4.36 Sculpture next to Wembley Park Station

4.68 The council recognises the role that public art can play in the creation of attractive and distinctive places and spaces. Public art engenders legibility in the landscape and promotes local identity, instilling civic pride and encouraging inclusive environments. As well as being a hub of sporting and architectural excellence, Wembley has the capacity to accommodate some significant permanent artworks as part of a coordinated approach to public realm and open space design.

4.69 Public art should connect both local people and visitors to Wembley as a destination and a “place”; it could recognise and celebrate the diversity of Brent’s population; it could enliven

buildings, spaces and places; it should stimulate, surprise, delight and amuse; and, it should enrich the lives of those who live, work and visit Wembley. The council will seek contributions towards a range of permanent art works across the area. This could take the form of a single large piece, or alternatively number of linked, smaller scale interventions into the public realm. Public art is not only considered to be permanent installations or artworks, but also music, dance, festivals and one-off occurrences. The design of public spaces should always consider how infrastructure such as stages, stalls and access to power and water for events could be provided where appropriate. This will influence the choice of materials as they will need to be robust enough to deal with heavy loads.



Picture 4.37 Public Art at Entrance to Brent River Park

4.70 Where proposals emerge around Principal Gateways or Key Nodes (Policy WEM2) consideration should be given to the incorporation of public art as a means of enhancing legibility and a local sense of identity. Provision must be made for the setting of public art as part of the design process – areas considered suitable for installations should be identified early, to enable supporting infrastructure to be provided. The opportunity and potential for buildings and landscapes to be pieces of art in themselves should not be missed.

4.71 There are a number of existing open spaces in the AAP area and the Wembley Masterplan SPG 2009 proposes a series of new public open spaces. Where development proposes the creation of new open spaces, provision should be made for the setting of public art as part of the design process.

WEM 4

Public Art

Where appropriate, the design of public spaces should allow for event infrastructure.

The council will seek contributions towards public art from development within the AAP area, particularly at key gateways or where new open spaces are proposed.

The design of new open space should include a place for public art.

4 Urban Design & Place Making

Tall Buildings in Wembley

4.72 A range of policy documents have been produced that provide indicative building heights expected by the council. The Wembley Masterplan identifies a range of locations for tall buildings (over 30m) including 3 locations for buildings of 15-20 storeys (approx 45-75m). The Wembley Link SPD advocates a fresh approach to building heights within the town centre whereby a number of taller buildings will be considered at key locations - none of which should be higher than at Wembley Central Square.



Picture 4.38 Wembley Central Square Development

4.73 Recent planning consents, as well as existing tall buildings, provide a context for assessing where new tall buildings may be appropriate. In order to provide a thorough assessment of the area, it was considered necessary to undertake the production of a strategy for tall buildings, 'Tall Buildings in Wembley' in order to provide a rigorous and co-ordinated approach to building heights. This document forms the basis for the policy below and should be read in conjunction with the Area Action Plan.

4.74 The principal conclusions of the Tall Buildings Strategy are:

- Much of the scope for tall buildings has already been utilised with a number of major applications already approved or under construction.
- The focus for tall buildings should be restricted to key nodes and around the pedestrian spine between Wembley High Road and Wembley Park Station due to its accessibility, topography and the location of existing and consented tall buildings.
- Areas designated as 'appropriate' will still be required to demonstrate how they do not negatively impact on key views of the Stadium as set out in WEM 6.
- Areas designated as 'sensitive' may have some scope for a tall building, but due to adjacent properties, site assembly or location of the site (orientation, etc.) will require further

work to establish an appropriate form of development.

- Protection of views of the Stadium should focus on local views and the role of the Stadium in enhancing local identity.

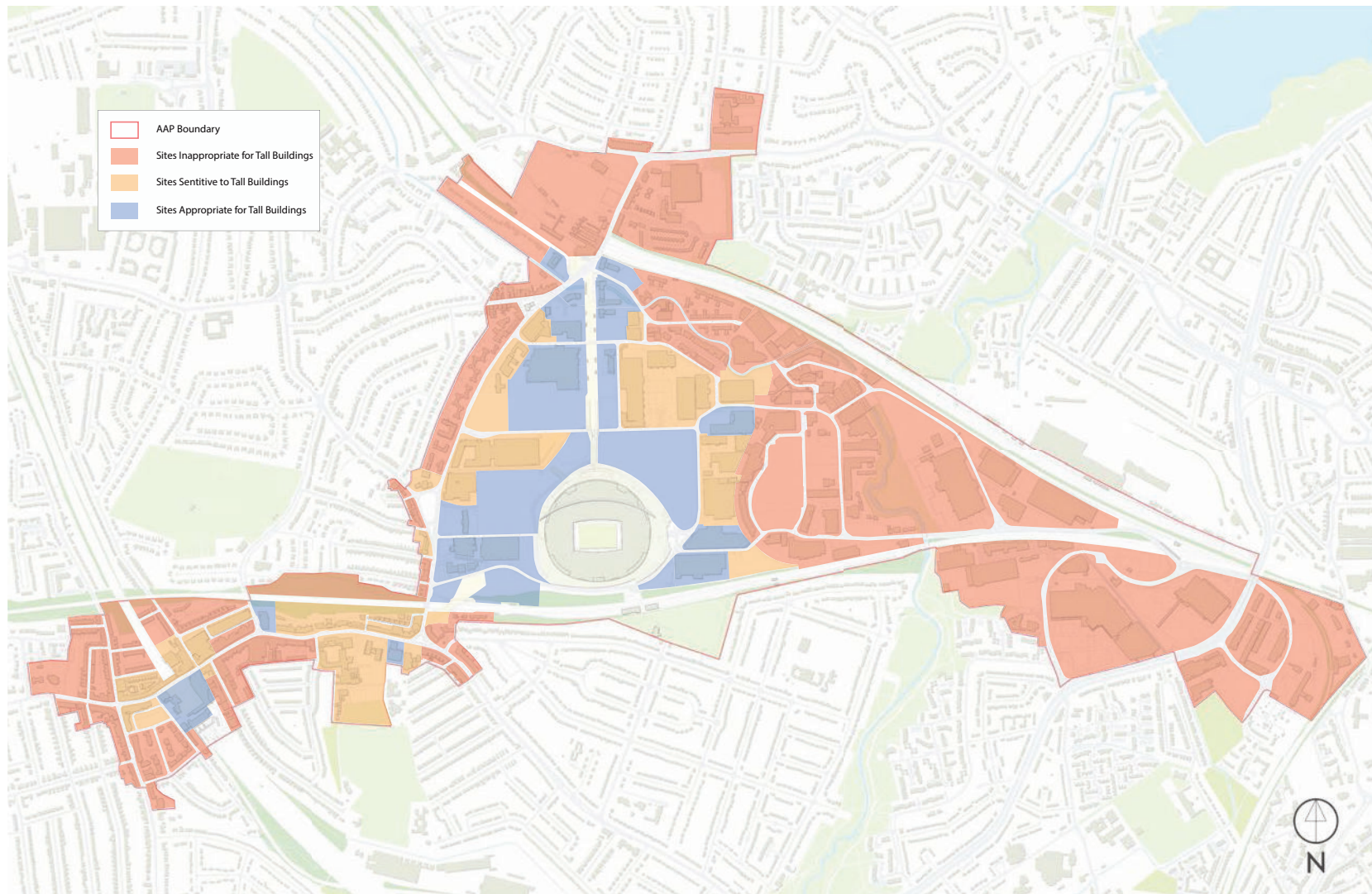
4.75 In line with WEM1, the council requires planning applications for tall buildings affecting listed buildings and buildings of architectural merit to demonstrate how proposals will conserve their significance and setting.

WEM 5

Tall Buildings

Tall buildings will be acceptable in a limited number of locations within the AAP area, where they can demonstrate the highest architectural quality. Where tall buildings are proposed in areas designated as 'appropriate' and 'sensitive' the council will require the submission of a key views assessment to accompany planning applications ~~proposals must also fully demonstrate their impact on key views of the Stadium.~~ Any application for a tall building within Wembley will be required to submit a three dimensional digital model in a format specified by the council.

Urban Design & Place Making 4



Map 4.4 A Strategy for Tall Buildings

4 Urban Design & Place Making

Protection of Stadium Views

4.76 The National Stadium plays an important role locally, regionally, nationally and in an international context. It is a major venue for world class events, and attracts millions of visitors each year. It is an iconic landmark, a large employer and a significant revenue generator for current and future local businesses. The impetus provided by the Stadium has now provided a shift in perceptions of Wembley into a global brand worthy of substantial investment.

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Picture 4.39 View of Wembley Stadium from Chalkhill Park

4.77 The Stadium is undoubtedly the most significant building in Wembley. It simultaneously creates a strong and distinct identity for the area, whilst also being somewhat alien to its suburban residential context in terms of scale and function.

4.78 Views of the Stadium contribute a significant amount to the perception of Wembley as a whole, performing a range of functions that add a layer of depth to the visual experience of the area.

4.79 These functions include:

- Civic pride
- A sense of local identity
- A prominent local way finding device
- Stimulating sporting aspiration
- A sense of arrival: event crowds
- Aiding legibility across the wider area

Brent's UDP (2004)

4.80 Policies BE34, WEM18 and WEM19 of the UDP seek to The council will therefore protect a range of short, middle and long distance views of the National Stadium. ~~Although the initial assessment was based on the original Stadium, the protection of such views extends to the new Stadium.~~ A fundamental element of the development of a Strategy for Tall Buildings for Wembley was the evaluation of the views set out in the UDP. The study recommended the removal, retention and addition of a number of important views that will need to be considered as part of any application for tall buildings.

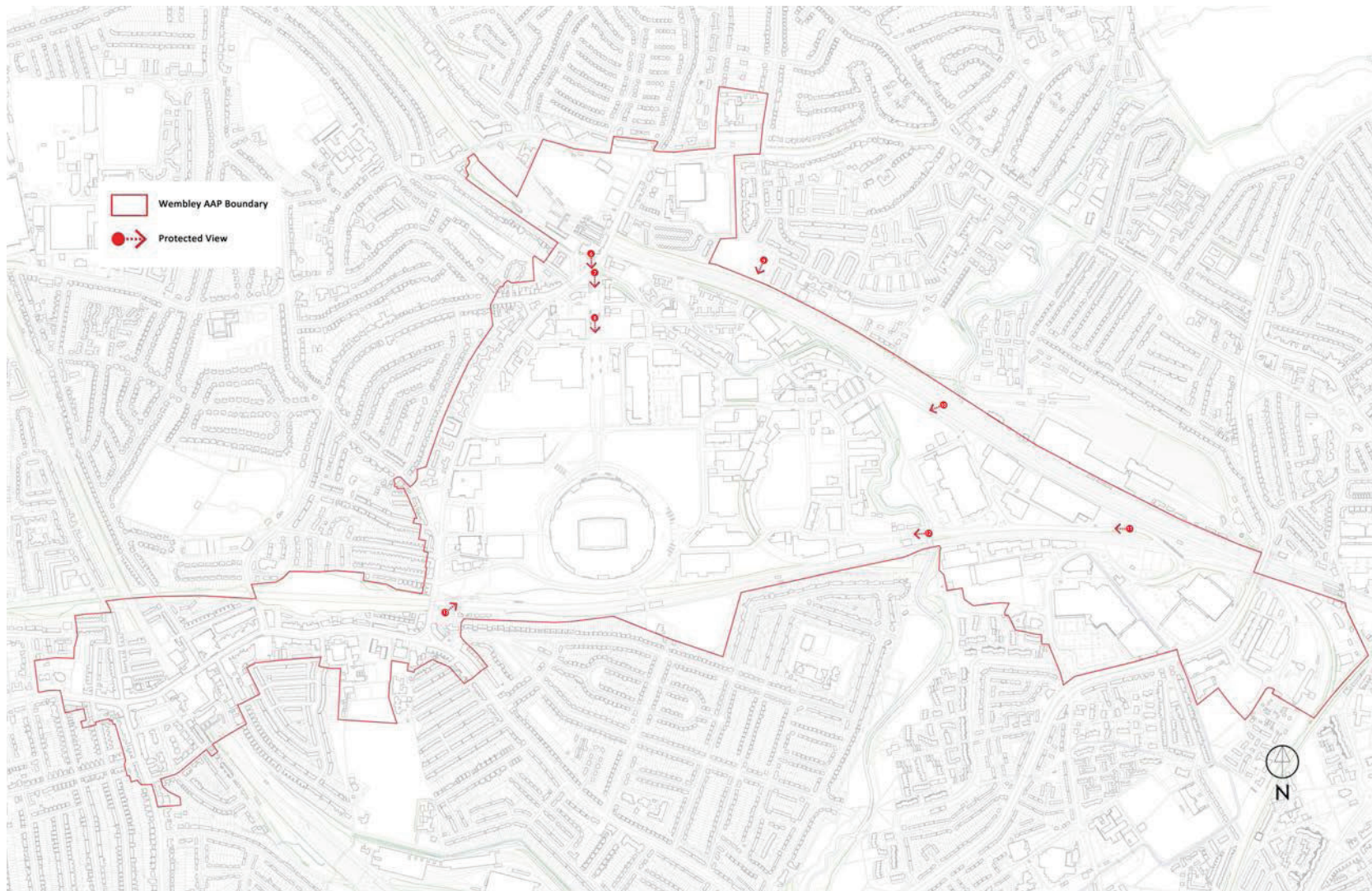
WEM 6

Protection of Stadium Views

Regard should be had to the impact of development on the following views of the National Stadium:

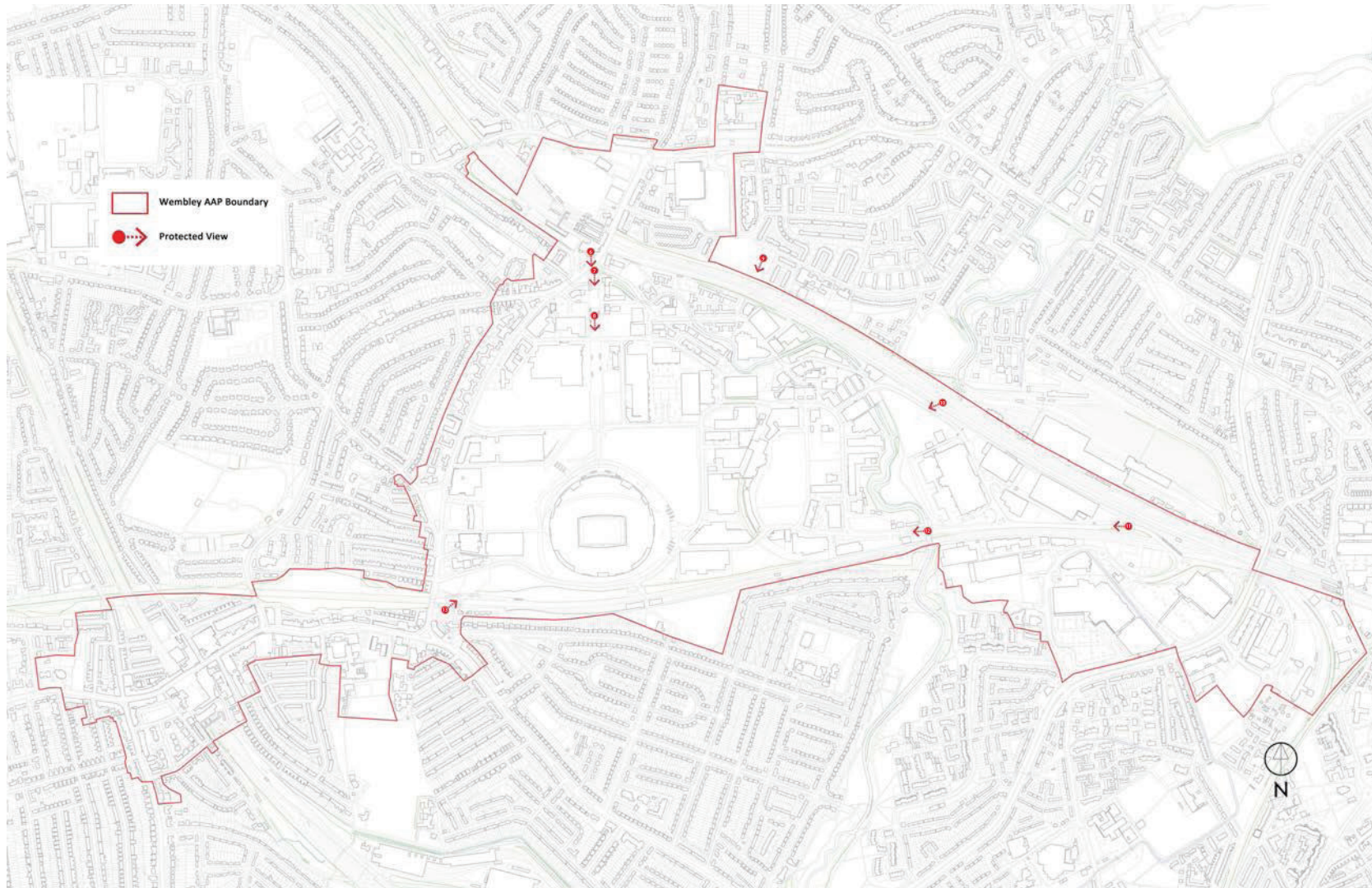
1. Barn Hill, Wembley
2. Elmwood Park, Sudbury
3. Horsenden Hill, Perivale
4. Welsh Harp Reservoir
5. Wembley Park Station
6. South Way at the River Brent Bridge
7. The Bobby Moore Bridge
8. Olympic Way North of Fulton Road
9. Chalkhill Park, Wembley
10. The White Horse Bridge
11. Great Central Way
12. Metropolitan & Jubilee Line north of Neasden Station

Urban Design & Place Making 4



Map 4.5 Protected Local Views of the Stadium

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Map 4.6 Wider Protected Views of the Stadium

Urban Design & Place Making 4

Protecting the Special Character of Olympic Way

4.81 The importance of Olympic Way for the successful regeneration of Wembley cannot be underestimated. It is an internationally recognised processional route and perhaps one of the most important streets in Brent. It is an integral part of the visitor experience for Stadium events but it is the continued every day use of this street that is regarded as the highest priority. The creation of an exciting, active and animated Olympic Way at all times of the day and throughout the year, whilst ensuring safe access to and from Stadium events, is regarded as fundamental to the success of the area.



Picture 4.41 Artist's impression of Olympic Way

4.82 The principle of creating a number of smaller pocket spaces flanked with lower level building projections along the route has been firmly established by the Wembley Masterplan and subsequent approval of the Quintain North West Lands development. This will create a series of unique spaces with a more intimate, human scale containing a range of soft landscaping, water and lighting, as well as dedicated spaces for performance, public art and seating that will encourage people to meet, dwell and socialise. In order to establish a rigorous and consistent design approach, any proposed development flanking Olympic Way must seek to incorporate complementary pocket spaces, or otherwise demonstrate how it successfully contributes to significantly enhancing the public realm.

4.83 In line with policies WEM5 and WEM6, proposals for tall buildings must demonstrate that they have no adverse visual impacts on views of the stadium from Olympic Way.

WEM 7

Character of Olympic Way

Proposed Development on Olympic Way must be carefully designed and scaled to respect the predominance of Wembley Stadium and its arch.

Proposals for tall buildings must demonstrate that they have no adverse visual impacts on views of the stadium from Olympic Way.

The council will seek active ground floor uses either side of Olympic Way that can be appropriately managed on Event Days.

Development flanking Olympic Way will be expected to incorporate pocket spaces.



Picture 4.40 View of Wembley Stadium from Wembley Park Station

4 Urban Design & Place Making

Securing Quality Design Materials Quality



Picture 4.42 A well detailed contemporary home extension

4.84 The Council is responsible for achieving sustainable development; this includes the protection and enhancement of the borough's built environment over the long term. Pressures on the economic viability of development can result in aspects of design coming under threat during a downturn, including quality of building materials and finishes. However, it is important that the whole life costs of a development are considered and design solutions interrogated to ensure that limited resources are targeted to their best effect.

4.85 The appropriate choice of materials is an important element of sustainable development and can result in an improved built environment, greater energy efficiency, less pollution and a range of other social and ecological benefits. There is also a considerable amount of research that highlights the economic benefits of high quality design, such as increased market attractiveness, higher rent and capital values.

4.86 High quality design should be is a fundamental n-integral part of the vision for Wembley scheme development and, as such, should be built early on into all budgetary projections. This is particularly important for the more expensive elements of a scheme, such as façade materials and the amount of space and attention given to landscaping. A good building design is often a function of the materials specified for construction. All buildings, to a greater or lesser extent, are a function of their construction detail. The choice of materials is second only to the way

their connections and junctions are detailed. Such a choice should be a fundamental consideration of the development of a design proposal for a building.

4.87 All too often, the quality of materials used in the final build out of development is reduced significantly for reasons of cost after planning permission has been granted and in many cases this has adversely affected the quality of the development. The 2009 Masterplan aspires to secure quality detailing at an early stage of the design process in order to avoid such 'value engineering'. Brent Council welcomes examples of the quality and type of materials proposed at the time of application. Therefore detailed specifications of the primary materials suite, including façade materials, fixings and junctions between materials, should be submitted as part of a planning application for major developments (10+ residential units or 1000m2). And it should not be assumed that the choice can be made at a later date, It is recognised that developers may need to seek approval for alternative high quality materials after planning permission is granted.

4.88 The council encourages the provision of information on the quality of details as part of planning submissions, to illustrate and promote the overall design theme. Securing detailed specifications as part of the planning consent would give all parties the confidence that the quality of the final buildings would remain high.

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4.89 Design guidance in the form of supplementary planning documents has been prepared for a number of locations across the Plan area. Where applicable, design proposals should have regard to the Wembley Masterplan, Wembley Link, Wembley West End (South) and Brent Town Hall SPDs.

WEM 8

Securing Design Quality

The Council will ~~require~~ expect details the submission of the primary materials suite ~~detailed specifications~~ to be submitted as part of all major applications within the AAP area.

Evidence Base - Urban Design and Place Making

- Tall Buildings in Wembley (LBB, July 2012)
- Brent Town Hall SPD (LBB, March 2012)
- Wembley Link SPD (LBB, July 2011)
- Wembley Masterplan (LBB, June 2009)
- Wembley West End (South) SPD (LBB, November 2006)

5 Business, industry and waste

Strategic Policy

5.1 The Wembley area includes a significant proportion of the Borough's industrial land in two industrial areas at Wembley and Neasden. They are separately identified as Strategic Industrial Locations (SIL). This means that under policy 2.17 of the London Plan they should be promoted and protected as main reservoirs of industrial capacity and related activities such as logistics, waste management and utilities. London Plan policy is reflected by policy CP20 of Brent's Core Strategy which promotes protects SILs for industrial employment and closely related uses characterised by use classes B1, B2 and B8, or Sui Generis uses that are closely related. However, the boundaries of such areas are not sacrosanct and the level of employment land protected should reflect changed circumstances, especially changing levels of demand for industrial land. London Plan policy 2.17 recognises that flexibility over the designation of such land may be required and suggests that this may be achieved through "a strategically co-ordinated process of SIL consolidation through an opportunity area planning framework or borough development plan document".

5.2 Strategic planning policies for waste management are also important for industrial locations. London Plan policy recognises that London needs to increase its waste processing capacity and SILs are seen as a major source of new sites. The London Plan safeguards existing waste management sites by allowing their loss only where additional compensatory provision is made

(policy 5.17). Brent, together with other west London boroughs, has prepared a Joint Waste Plan which identifies new sites across the sub-region for processing waste. One new site in Brent, at Hannah Close within the Wembley SIL, has been identified and this is now operational.

5.3 London Plan and Brent Core Strategy policy seeks to promote office development and redevelopment in strategic locations such as Wembley, so that it can be ensured that, in accordance with the London Plan, there is "enough office space of the right kind in the right places to meet demand from an increasingly service based economy". However, demand in Wembley currently continues to be constrained and is unlikely to pick up in any significant way in the short to medium term. Boroughs are urged by the Mayor to renew and modernise office stock in viable locations but also to manage changes of surplus office floorspace to other uses (London Plan para. 4.12). In this context it should be noted that the London Plan identifies Wembley as a Strategic Outer London Development Centre where, if justified by demand, the renewal and modernisation of office stock is appropriate.

Policy Context

5.4 There have been substantial changes in the nature of businesses operating in Wembley over the last 20 or more years, with a significant decline in the amount of office space available as office buildings have been converted to other uses, together with a decline in manufacturing and other

industrial activity. There has been a consequent reduction in office and industrial employment. The retail sector and other services have not experienced the jobs growth that many other parts of London have so, overall, employment levels have fallen. Brent's Employment Land Demand Study 2009 estimated the likely demand for employment land across Brent up to 2026. It concluded that 13 hectares of land could be released from the existing stock of 266 hectares across the borough.

5.5 The opening of the new Stadium in 2007 gave a major boost to the local economy, although most new jobs will be delivered by the regeneration of the area around the Stadium. Quintain Estate and Development's stage 1 scheme is well underway and is expected to provide over 6,000 jobs. More recently, permission for major, mixed use residential and commercial development on the north west lands at Wembley will provide a further 2,300 jobs.

5.6 It is not possible to separately estimate the changes in employment across the industrial area (SIL). However, this is likely to have declined over the past 20 years or so as industrial activity has reduced and sites have increasingly been given over to open storage and similar uses. The level of waste management undertaken in the industrial area has also increased and ~~may be~~ is reaching a level where it is impacting upon Wembley's regeneration prospects.

5.7 Road access to the industrial area has improved now that the new estate access corridor linking to Great Central Way is open so that

Business, industry and waste 5

businesses in most of the area can benefit from a minimum of interference from events at the Stadium and Arena. However, there remain problems for those operations which are located adjacent to the Stadium or which have direct access from the one way system along Fourth and Fifth Way.



Picture 5.1 South Way approach to Wembley

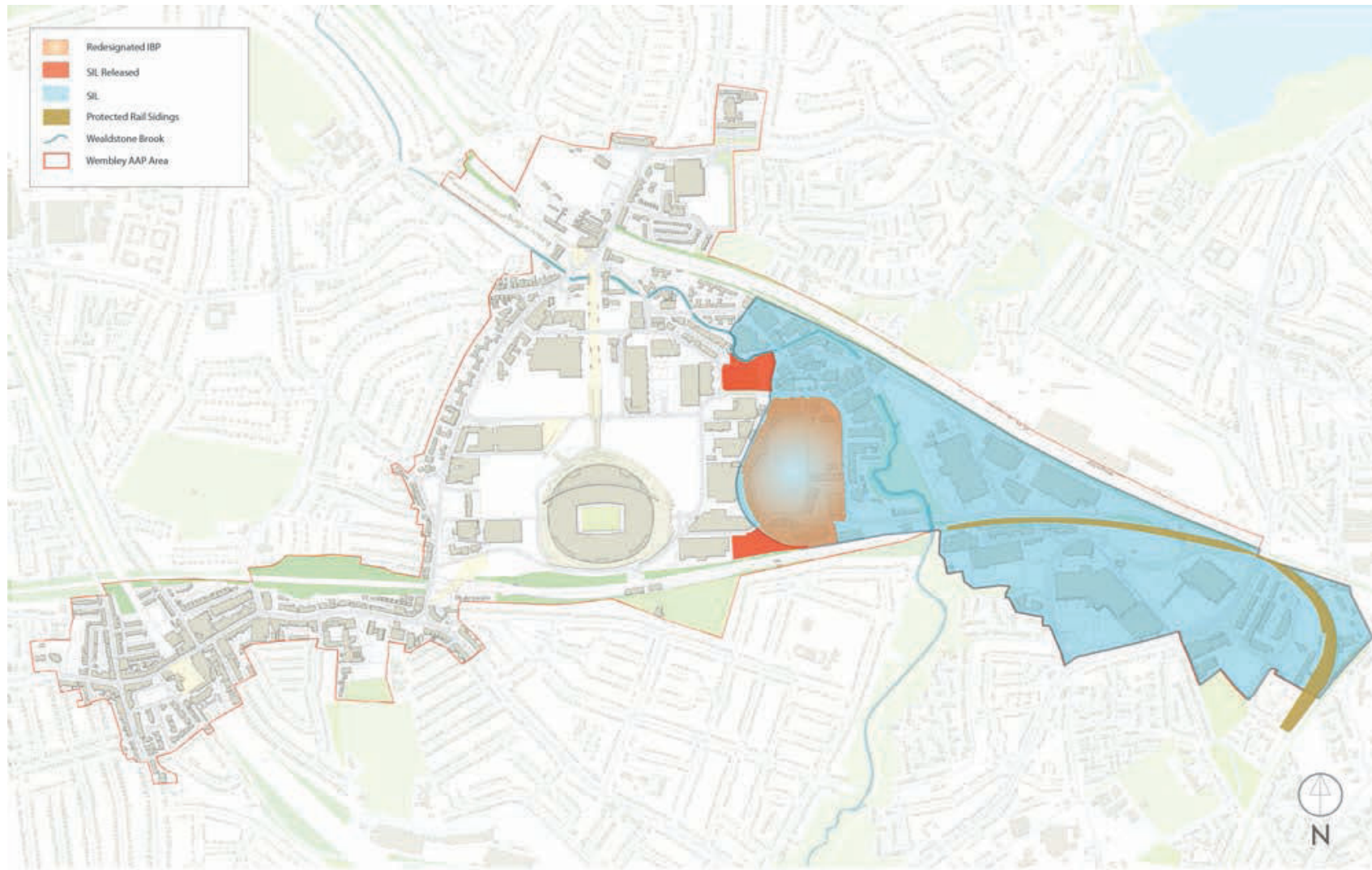
Strategic Industrial Location (SIL)

5.8 The SIL, immediately to the east of the Wembley Growth Area, was established in the 1980s when policy protecting employment land was first introduced. There has been substantial change since the current boundaries of the SIL were established in the UDP 2004. Not only have there been changes locally in terms of the use and occupation of land in the industrial estate, but also in terms of the demand for industrial premises and land as a result of the national economic downturn. By 2011 vacancy levels in the Wembley SIL had increased by 36% to 8.4 hectares from 6.2 hectares in 2003. Likewise vacancies in Neasden increased from 2.8 hectares in 2003 to 3.9 hectares in 2011. In addition to this, it is also clear that substantial areas of land are underused, particularly in terms of the level of employment provided. For example, a number of large sites are now given over to open storage, builders yards or waste transfer, some of which have only temporary planning consent. The

area of land accommodating such uses has increased from 1.71 hectares in 2003 to 3.16 hectares in 2009.

5.9 It is proposed that the SIL area will be reduced slightly to the new boundary shown in Map 5.1. In addition, the council will work with the GLA to re-designate part of the SIL from Preferred Industrial Location (PIL) to Industrial Business Park (IBP) (shown on Map 5.1). While PILs are suitable for uses including general industrial, storage and distribution, waste management and recycling, IBPs are suitable for activities that need better quality surroundings including research and development and light industrial. This will create a buffer zone between the non-industrial uses proposed for the Comprehensive Development Area and the SIL. The London Plan definitions of PIL and IBP, including appropriate uses, are set out in Appendix B. ~~Planning policy towards proposals for d Development within the SIL will be subject to London Plan policy 2.17 and Brent's Core Strategy policy CP20 together with policy WEM8 for Wembley Stadium Business Park set out below.~~

5 Business, industry and waste



Map 5.1 Business, Industry and Waste Designations

Business, industry and waste 5

Wembley Stadium Business Park

5.10 Although little business (B1) development has come forward since the business park designation was established in the UDP 2004, it remains a good option for promoting regenerative development of run-down parts of the industrial estate. In this way modern premises can be provided which can boost job generation locally as well as improving the environment and townscape on the main access route to the Stadium and to Wembley City. It is now considered, however, that a more realistic designation is that shown on the ~~Proposals Map extract below. This reduces the area to that bounded by First Way and Fourth Way, and allows for more general industrial, distribution and open storage or waste management uses to locate to the north and east. Not only are waste management uses considered incompatible with business park development but their potential impact upon regeneration can be minimised by limiting them to the estate further away from key regeneration sites. It is, therefore, appropriate to limit such uses within the area designated as business park.~~

WEM 9

Wembley Stadium Business Park

Redevelopment for business use of the area east of the Stadium, as shown on the ~~Proposals Map~~, will be encouraged.

Development attracting large numbers of trips should contribute towards transport improvements appropriate to the scale of the proposed development.

Development for waste management, and related uses such as aggregate storage and transfer, will not be appropriate in this area. The relocation of such uses from within the business park area will be encouraged.



Picture 5.2 Towers Business Park, Carey Way

Offices



Picture 5.3 Brent House, Wembley High Road

5.11 Increasing the number of jobs available in Wembley is a key element of the vision and objectives for the area and this is reflected in the targets for new jobs in both the London Plan and the Core Strategy. Wembley has excellent public transport access and availability of development land. According to the latest assessment of demand, the 2012⁰⁹ London Office Policy Review, there will be a lower growth in office based employment will continue to grow in London in the future. It is anticipated this will result in office stock renewal rather than net expansion. although historic performance has shown that employment growth has not translated into office floorspace demand. It is likely that there will be little demand for new purpose-built offices at Wembley for the foreseeable future and, as a consequence, other types of development are likely to drive job creation. Although permissions exist for over

5 Business, industry and waste

100,000 sq metres of new office space in Wembley, in light of past trends in take-up locally and the national economic downturn, it would be prudent to assume that significant demand will only arise if there is a major change in circumstances. Although the council will be moving into 15,000 sq metres of new space by the end of 2013 when the new civic centre is occupied, it will also be freeing up a greater amount of existing space. The London Office Policy Review 2012¹⁰⁹ recommends that a realistic view is taken of outer London centres which are recognised as having no significant part to play in the London office market, other than providing for local needs. It is unlikely that demand will pick up in the short to medium term.

Without significant demand for office development, if current planning permissions are built out it is likely that there will be a significant excess of office floorspace in the Wembley area. The London Office Policy Review 2012 recommends a flexible approach is taken to the re-use of redundant of and underutilised office floorspace. In accordance with London Plan and existing UDP policy, it is reasonable that, if there is shown to be a surplus of office floorspace, and that there is no prospect of re-use in the medium term, to allow this to be converted to appropriate alternative uses such as hotel, education use or housing. Lack of effective demand for occupation as offices will normally be demonstrated by, for example, the vacancy of similar premises in the area or by the lack of success in finding an occupier after vigorous marketing efforts. The vacancy of

buildings for at least two years, despite marketing efforts, would generally be seen as confirming a lack of effective demand.

5.13 On 6 September 2012 the Government announced, as part of a package of measures to support economic growth, that permitted development rights would be introduced to enable change of use from office (B1a use class) to residential (C3 use class) without the need for planning permission. The Chief Planner confirmed by letter on 24 January 2013 the new rights will come into force in Spring 2013 and initially be time limited to a period of 3 years. There is a concern this will lead to a loss of viable office space within the Wembley area. The council intends to seek an exemption to the permitted development rights for Wembley to apply to the SIL, Opportunity Area and town centre.

WEM 10

Offices

The development of new office floorspace will be encouraged, particularly where it can form part of major mixed use development.

The re-use or redevelopment of redundant, purpose-built office buildings for appropriate alternative uses will generally be permitted subject to evidence to demonstrate that there are no prospects of occupation in the medium term.

5.14 There are currently few sites or premises where low-cost space for new business start-ups (i.e. new or emerging businesses) is available. It is appropriate therefore, as an alternative to office-based employment, to encourage the provision of new low-cost space for business start-ups, subject to demand.

WEM 11

Low-cost Business Start-up Space

The provision of new low-cost space for business start-ups will be encouraged in the SIL and as part of major mixed use development.

Protected Rail Sidings

5.15 Brent's Core Strategy identifies Neasden Stone Terminal and Neasden Drury Way rail sidings as strategic sites that should be safeguarded, in accordance with London Plan policy 6.14. These sidings are shown on the Business, Industry & Waste Map 5.1.

Business, industry and waste 5

WEM 12**Protected Rail Sidings**

The rail sidings known as Neasden Stone Terminal and Neasden Drury Way, and as shown on the Proposals Map, are safeguarded as strategic sites.

Evidence Base - Business, Industry and Waste

- London Office Policy Review (GLA, September 2012)
- Employment Land in Wembley (LBB, August 2012)
- West London Waste Plan: Proposed Sites and Policies Consultation Document (Mouchel, February 2011)
- London Office Policy Review (GLA, November 2009)
- Brent Employment Land Demand Study (URS, February 2009)

6 Transport

Strategic Policy

6.1 The London Plan and the Mayor's Transport Strategy seek improvements to public transport, walking and cycling capacity and accessibility where it is needed, including areas designated for development and regeneration. Although national planning policy, as expressed in the NPPF, no longer requires that maximum parking standards be applied, the London Plan specifies maximum parking standards for new development with the aim of encouraging a move to sustainable transport modes and reducing the need to travel by private car. Currently, Brent's parking standards, as provided in the adopted UDP, do not mirror those in the London Plan. For Wembley, parking standards have been modified to align with those in the London Plan 2011, bearing in mind the regeneration objectives of the Wembley Growth Area as well as the potential negative impact that this could have on Wembley's town centres.

6.2 London Plan policy for the Wembley Opportunity Area sees upgrades to the 3 stations as important and recognises that "improvement of public transport will play a key role in managing heavy demand for mass movement" and that "links between the stations and strategic leisure facilities should be improved".

6.3 One of the main objectives in Brent's Core Strategy is that access by public transport, bicycle and on foot should be promoted and car parking standards reduced in Growth Areas because of

their relative accessibility. A specific aim for Wembley is to reduce modal share of car trips from 37% towards ~~24~~ 25%.

6.4 Policy CP7 of the Core Strategy highlights a need for new road connections and junction improvements in the Wembley regeneration area, these include:

- North End Road/Bridge Road junction;
- The Triangle junction of the High Road, Harrow Road and Wembley Hill Road;
- Widening of the bridge on Wembley Hill Road over the Chiltern Railway; and
- Conversion from one way to two way operation of South Way and Fifth Way to the east of the Stadium.

6.5 Policy CP14 highlights a need to enhance the key interchanges at Wembley Central and Wembley Stadium. It also states that the council will promote improvements to orbital transport routes which link strategic centres in North West London and the Growth Areas, making use of contributions from development where appropriate. Improved links from Wembley towards Brent Cross and Ealing (via Park Royal) are sought. Improvements to the distribution of buses through the Wembley area are a priority.

Policy Context

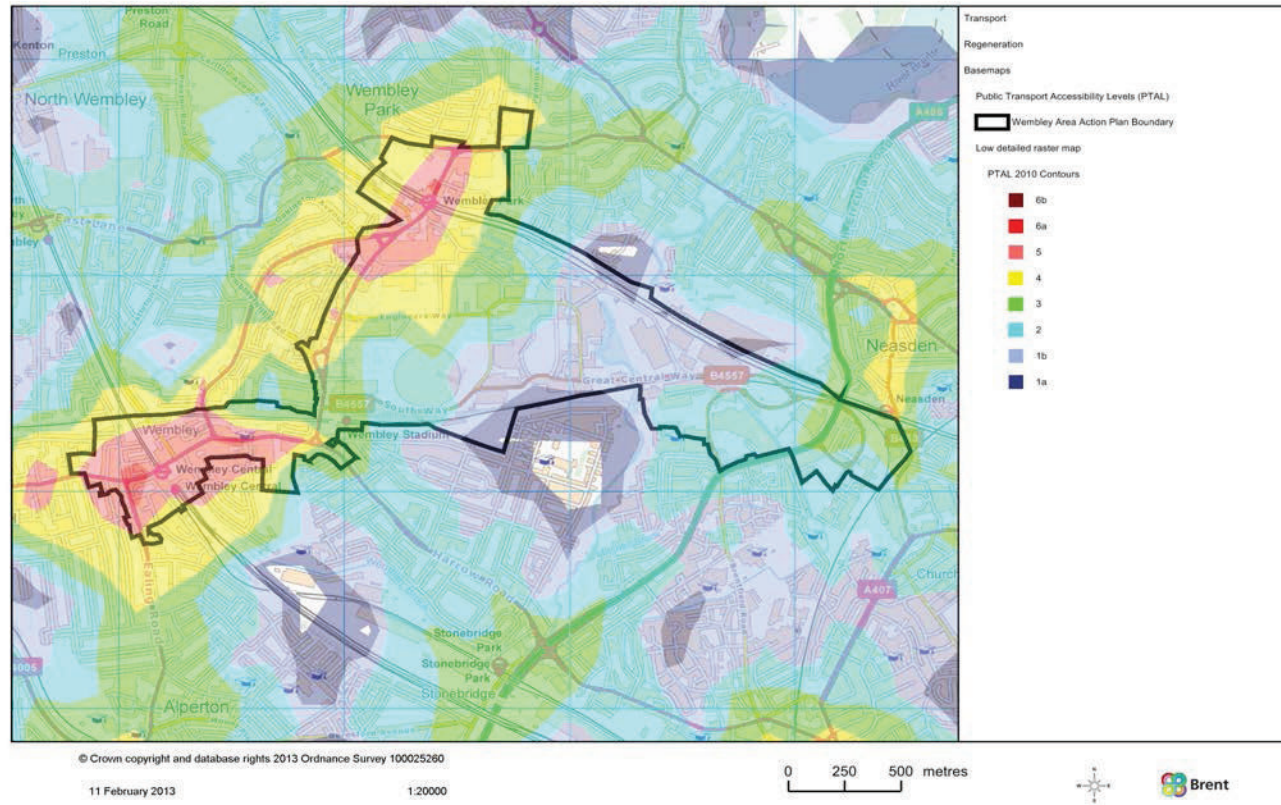
6.6 Wembley is a generally well connected area, particularly by public transport and radial links to Central London. Wembley is served by ~~with connections from~~ the Metropolitan and Jubilee lines at Wembley Park, the Chiltern line at Wembley Stadium station, and from London Overground and the Bakerloo line at Wembley Central, ~~all of which provide key access gateways into Wembley for public transport users.~~ Orbital links are primarily provided by bus, of which a large number of routes pass through Wembley. However, walking and cycling links within and from Wembley to the rest of Brent are either poor or non-existent. Largely due to the rail and underground links, ~~Wembley is therefore~~ Wembley is therefore can be thought of as a very sustainable location for major trip generating development (80% of events crowds choose to use public transport). but to support this, better pedestrian and cycle access will be sought in line with Brent's wider transport strategy. When the level of bus services is added, the area has a Public Transport Accessibility Level (PTAL) rating of up to 6 (out of 6) ~~which means it is one of the most accessible locations in London.~~ However, the PTAL for the Wembley Area (shown on Map 6.1) decreases towards the east with a PTAL of 1 or 2 in the Eastern Lands and Industrial Estate. Nevertheless, orbital public transport connections, for example linking to Brent Cross or Ealing, are not as good as the radial connections into central London or outer London and beyond. This is identified as a key area to be addressed by the Core Strategy although it should be recognised that the council

Transport 6

is not the responsible authority for such service improvements. These reside with Transport for London, Network Rail and the train operating companies, although the council can promote new or improved services and also introduce supporting infrastructure improvements.



6 Transport



Map 6.1 Public Transport Accessibility Level (PTAL) Zones

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6.7 In addition, public transport connections in the east of the area are less than satisfactory. Some improvements to Wembley Central and Wembley Stadium stations remain outstanding. Those at Wembley Central are being progressively implemented over the next few years, with the first stage providing improved access between the ticket hall and National Rail platforms. Those at Wembley Stadium station are dependent on development of adjacent lands, the timescale for which depends on the pace of progress of site promoters.

6.8 Although road connection via the North Circular Road (NCR) is generally good, there are concerns about operational effectiveness and potential congestion on the road network within, around and through the Wembley area when major development is delivered in Wembley, alongside developments further afield at Brent Cross. Road connections to the NCR and through the main regeneration area, planned prior to the stadium redevelopment have not been completed because of funding difficulties / security concerns. Congestion occurs regularly on main roads through the area and at key junctions. Also, there are few dedicated routes for cyclists within the area and the main rail lines provide barriers to pedestrian and cycle movements. Studies which have just been completed address some of these issues to reduce through traffic, improve the environment for to encourage more pedestrians, cyclists and public transport users, while providing convenient access for motor vehicles served by better located car parks. The approach to facilitating the level of development ~~that has been estimated as~~ likely to

come forward in Wembley, therefore, is one which balances the need to ~~minimise~~ discourage car use by prioritising walking, cycling and public transport whilst ensuring that the area is ~~also attractive~~ accessible to essential traffic ~~those who wish to come by car~~ such as event-related coaches, emergency services, waste and delivery vehicles, and disabled drivers.

Approach to Transport Improvements in Wembley

In investing in new transport infrastructure in Wembley, a balance will be struck between providing major infrastructure improvements which benefit car access and the needs of pedestrians, cyclists and public transport users.

Road and Junction Improvements

6.9 The Wembley Area Action Plan includes a small part of the Transport for London controlled North Circular Road (A406) which is part of the Transport for London Road Network (TLRN). The North Circular provides strategic highway access from Wembley particularly to the M25 and wider TLRN. the A404 (Harrow Road – High Road) is part of the Strategic Road Network (SRN) which TfL have a strategic interest over and, hence, will be consulted upon highway alterations. The rest of the roads in the Wembley Area Action Plan are borough controlled roads.

6.10 The Wembley Masterplan Transport Review, Nov 2008 concluded that the level and type of growth proposed could be accommodated providing that it was primarily based on public transport access. However, it was concluded also that there would be a need for some additional junction and access improvements, particularly the effectiveness of the junction at the Wembley Triangle and the South Way junction complex. Subsequently, the Transport Strategy Key Component Study, February 2009 re-affirmed the conclusions of the initial study and recommended potential measures to both minimise the need for travel and secure a substantial travel mode shift away from the private car towards the use of sustainable transport modes. Through the provision of enhanced bus services and facilities, improvements to pedestrian and cycling infrastructure, and the implementation of a range of travel demand management measures, sufficient reduction in development related traffic would be achieved to allow the level of development envisaged in the Masterplan.

6.11 The roles of South Way and the Wembley Hill Road/Empire Way/Forty Lane corridor are pivotal in providing the best balance of accessibility into Wembley by each mode. Issues of access for pedestrians and cyclists along Wembley Hill Road, and traffic congestion affecting bus reliability will be addressed through a strategy for this corridor. At the same time, access into Wembley via Great Central Way and South Way will be developed in a way which does not encourage through traffic

6 Transport

through Wembley High Road. This will be supported by parking in locations which supports these objectives.

6.12 It should be recognised also that for new major trip-generators such as shops and leisure facilities to be attracted to the area, then some dedicated parking provision for customers who wish to use their car is also necessary. A parking strategy has recently been concluded which has started to address this issue.

6.13 There is a need to encourage housing and commercial growth, and to promote the vitality and vibrancy of town centres in Wembley, without giving rise to unacceptable environmental conditions and levels of traffic congestion. It is also important that travel choices contribute towards sustainability objectives, including that modal share of car trips be reduced from 37% in 2009 towards 24%.

6.14 There are a number of road improvements that could be implemented, some of which are necessary to enable development. There are also specific road proposals which were included in the UDP in 2004 and which have been completed only in part, the remaining parts being potentially unnecessary to deliver the growth proposed but which would help to promote the regeneration of the area and lead to environmental improvements. For example the UDP includes a proposal to re-align South Way, the main route to the Stadium from the North Circular Road. The proposal is referred to as the Stadium Access Corridor.

6.15 A Highways and Bridge study has been completed which recommended ~~changes and improvements to South Way~~ the restoration of two way working to the Eastern Lands and Industrial estate gyratory to improve accessibility as development builds out. This will improve car access and movement within the Masterplan area and to ~~access stadium~~ car parks, but in a way which does not encourage through-traffic through the existing Wembley town centre. A number of short stretches of land are required to deliver these improvements, and are shown in Appendix C.

6.16 A number of junctions have been identified as needing improvements to mitigate ~~against~~ the impacts of traffic generated by development to maintain highway reliability for existing users, including public transport users. Some of these junction improvements have already been delivered using funding secured through extant planning permissions, as shown on Map 6.3. All junction improvements will take into account the needs of pedestrians and cyclists, with these users specifically prioritised along the Western Highway Corridor, which runs from Forty Lane to Wembley High Road. The junction of Wembley Hill Road and Empire Way was recently converted from a gyratory to a roundabout to provide a more attractive and easily accessible public space for the community ~~has recently been improved.~~ A number of junction improvements have been secured through existing Outline Planning Permissions. These are listed below together with other junction improvements to support future development not currently consented. The following junctions are expected

~~to require improvement.~~ Where applicable, land take to undertake these improvements is identified on the proposals map at Appendix C. Potential improvements include:

- Wembley Hill Road / Harrow Road / High Road – known as Wembley Triangle – capacity improvements can be delivered within the public highway and this improvement has been secured through existing Outline Planning Permissions.
- Widening of the road bridge over the Chiltern Railway – would support a junction improvement at Wembley Triangle which improves urban realm and condition for pedestrians and cyclists, land take required.
- Wembley Hill Road / South Way – capacity improvements and associated land take have been secured through an existing Outline Planning Permission. Additional land take for further enhancement is identified at Appendix C.
- High Road / Park Lane
- High Road / Ealing Road
- Empire Way / Engineers Way - capacity improvements have been secured through an existing Outline Planning Permission. Agreed land take is identified at Appendix C.

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- Empire Way / Fulton Road - capacity improvements have been secured through an existing Outline Planning Permission. Agreed land take is identified at Appendix C.
- Wembley Park Drive / Empire Way - capacity improvements have been secured through an existing Outline Planning Permission. Agreed land take is identified at Appendix C.
- New junction between North End Road / Bridge Road – land take required

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Bridge Road / Forty Lane – Feasibility study required underway and a contribution for the junction improvement has been secured through an existing Outline Planning Permission.

6.17 Any improvements to the Transport for London Road Network (TLRN) or the Strategic Road Network (SRN) will have to be consulted and approved by TfL.

6.18 In addition, to enable two way operation on Fifth Way and South Way a number of junction improvements will be required. These include:

- Fifth Way/Atlas Road
- Fifth Way/Fulton Road
- Fifth Way/First Way/Engineers Way (land take required)
- South Way/First Way

6.19 Plans showing the land required for these improvements are shown in Appendix C. Where land outside of the highway boundary is sought for improvements the acquisition will be sought by agreement, but Compulsory Purchase procedures may be utilised where it is considered necessary to address existing deficiencies and deliver the council's Core Strategy objectives.

WEM 13**Road and Junction Improvements to Stadium Access Corridor and Western Access Corridor**

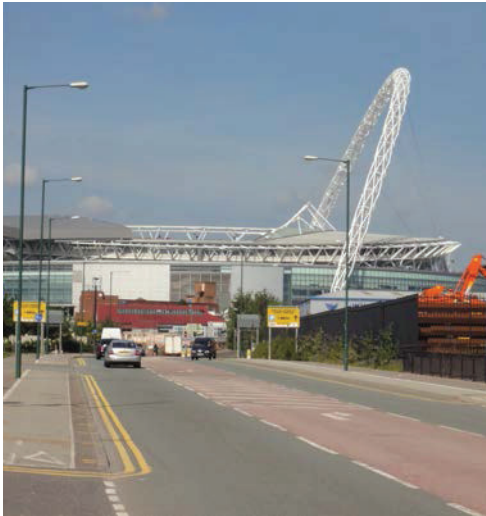
The council will develop improved highway access for car travel from the North Circular Road by improving the Stadium Access Corridor (Great Central Way/South Way) and the Western Access Corridor (Atlas Way/Fifth Way/Fulton Road) with South Way being widened, and two way working restored to both South Way and Fifth Way. The remaining parts of the gyratory system will be returned to two-way working as development comes forward on adjacent sites. A new road connection will be provided from North End Road to Bridge Road to provide an alternative route through Wembley Park.

WEM 14**Western Highway Corridor**

The council will develop improved access for public transport, pedestrians and cyclists, especially from Forty Lane to Ealing Road via Empire Way and Wembley High Road. Junction and highway improvements along this route are required to facilitate development and will be designed to ~~favour these non-car users as well as~~ improve general highway performance, including for non-car users. Any improvements would need to be supported by modelling.

Land for improvements will be determined and secured when planning consent is granted for re-development of the site. This will ensure that on re-development, improvements for public transport users, pedestrians and cyclist will be secured.

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Picture 6.1 Great Central Way towards South Way - 'Stadium Access Corridor'

to travel by car whilst encouraging people to use other modes of travel, particularly public transport. The aim is to achieve an appropriate balance between restraint on car use, by allowing fewer parking spaces associated with development, and promoting regeneration, with more generous allowances for parking. The London Plan establishes the parameters within which levels of parking required can be varied.

6.21 A study of parking has just been completed which recommends a strategy which provides parking in locations which support the key approaches promoted for access by car. The main parking locations will be on the edges of the town centre, so that the central parts of the town can be protected to support their use by pedestrians and allow public realm improvements to be delivered to reduce the impact of through traffic routing through the town centre. The future locations for parking will also support the use of the boulevard in providing improved walking and cycling accessibility between the Masterplan area and Wembley town centre.

6.22 The council will continue to develop the car park strategy for the area by encouraging car parking for town centre uses, in locations on the edge of the town centre to reduce the negative impact of traffic along Wembley High Road.

6.23 Car parking dedicated for events at the stadium is officially limited to 2,900 spaces. This is down from 7,200 spaces for the old stadium because the aim is to encourage a more

sustainable mode of travel to events and reduce congestion on local roads. Unfortunately, pirate contract parking is undermining the objectives of limiting parking. Priorities for vehicular access to the stadium need to balance the use of the area by all vehicles and pedestrians. The Wembley transport strategy identifies priorities for different road users along the approaches into Wembley. Working with key stakeholders, the Council will seek to minimise the negative effect of the use of pirate contract car parking.

Car Parking in Wembley

Parking Strategy

6.20 Parking provision can be used as a mechanism for implementing a policy of restraint on car usage and promoting other more sustainable modes of travel. At the same time, however, there is a need to promote successful regeneration. In Wembley, success will be measured in part by the amount of retail floorspace and other visitor attractions that are provided, and the number of visitors to the area. In order to promote such development it is necessary to provide a level of car parking similar to other competing centres and development that can attract those people that wish

WEM 15**Car Parking Strategy**

The Council will continue to develop the car park strategy for the area by encouraging car parking for town centre uses, in locations on the edge of the town centre to reduce the negative impact of traffic along Wembley High Road

6.26 The tables below show the residential, employment and retail parking standards for the Borough.

PTAL	Housing Type		
	1-2 beds	3 beds	4+ beds
1-3	0.5 spaces per unit	0.75 spaces per unit	1 space per unit
4-6	0.4 spaces per unit	0.6 spaces per unit	0.6 spaces per unit

Table 6.1 Wembley Area Action Plan: Residential Maximum Car Parking Standards

PTAL	Use Class		
	B1	A2	B2 and B8
1-3	1 space per 200m ²	1 space per 200m ²	1 space per 200m ²
4-6	1 space per 400m ²	No additional parking	1 space per 400m ²

Table 6.2 Wembley Area Action Plan: Employment Maximum Car Parking Standards

	PTAL 1-3	PTAL 4-6
Food - up to 500m ²	1 space per 100m ²	1 space per 200m ²
Food - up to 2,500m ²	1 space per 60m ²	1 space per 120m ²
Food - over 2,500m ²	1 space per 30m ²	1 space per 60m ²
Non-food	1 space per 50m ²	1 space per 100m ²
Garden Centre	1 space per 50m ²	1 space per 100m ²
Town Centre, Shopping Mall, Department Store	1 space per 50m ²	1 space per 100m ²

Table 6.3 Wembley Area Action Plan: Retail Maximum Car Parking Standards

Parking Standards

6.24 An updated set of parking standards has been developed for Brent, for regeneration areas, and specifically for Wembley. The revised parking standards offer greater flexibility for approving appropriate parking levels for Wembley taking account of different PTAL levels, land uses, existence of CPZs and the role of car free developments while promoting inward investment because Wembley is a regeneration area.

6.25 The council aims to restrain car use by applying low maximum standards and direct resources towards improving public transport and walking and cycling routes. The standards seek a balance between the London Plan standards, the existing Borough standards and the need to ensure new development is served adequately in keeping with the regeneration initiatives for the Wembley Growth Area.

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Car parking standards

The council will adopt car parking standards in Wembley as set out in the tables above.

The council will promote the implementation of car-free development where it can be associated with good public transport accessibility.



Picture 6.2 Wembley Park underground station

6.28 While rail and underground provides good radial connections, orbital access and in particular connections to the major centres of Ealing and Brent Cross, ~~and the major employment areas of Wembley Park and Park Royal is poor~~ are provided by bus. Many of the orbital routes suffer from high levels of congestion making bus a less attractive option for these journeys.

6.29 As development intensifies, and in order to encourage investment in ~~appropriate development in line with regeneration initiatives~~ and further regeneration, improvements to orbital connectivity and linkage with key centres will be pursued. Brent, together with neighbouring local authorities and partnerships, has been supportive of new and/or improved connections and is promoting such initiatives ~~with Transport for London as part of its involvement in~~ through the councils input into the West Sub Regional Transport Plan. However, it

must be recognised that such initiatives require the council to justify to Transport for London that any improvement proposals are compatible and consistent with the West Sub-Regional Transport Plan. Proposals may subsequently require funding support for Transport for London, and requests for additional services will need to be prioritised against ~~other requests.~~ In addition, the council is currently working with Transport for London on developing future Bus Strategy for Wembley which will identify a viable future bus network which supports future development phasing together with identifying the bus infrastructure required to support that network. It is recognised that any changes to the bus network will have to be agreed with TfL and that changes will not be restricted to the proposals set out in this AAP.

6.30 There is currently work being undertaken by Transport for London Rail to explore options for links between Old Oak Common and Brent Cross via the Dudding Hill line in relation to the development of Old Oak Common interchange station between High Speed Rail 2 (HS2) and Crossrail. A station could potentially be located at Neasden providing interchange with the Jubilee line. In addition, Transport for London and Network Rail are exploring the potential from some Crossrail services to run from Old Oak Common onto the West Coast Mainline and onwards to Hertfordshire and beyond. These services would likely call at Wembley Central.

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Picture 6.3 Bus 182

6.31 In response to the above requirements, to orbital connectivity challenges identified within the West London Sub Regional Plan, a Strategic Corridor study has just been completed for a consortium known as WestTrans (on behalf of all West London Boroughs in West London) which has highlighted specific issues relating to the Brent Cross - Wembley Corridor, and the Wembley - Ealing corridor. These include congestion issues affecting buses serving the Wembley Hill Road/ Forty Lane corridor, and reliability issues for bus services between Wembley and Ealing. The study

recommends a number of improvements which assist with facilitating better orbital connectivity, and improving movement for non-car modes.

6.32 Significant progress towards implementing the improvements needed to fulfil the objectives of the “Three Stations” strategy had been made by the time the National Stadium opened in 2007. The refurbishment and increase in capacity at Wembley Park station had been completed; major access improvements had been made to Wembley Stadium station through the construction of the White Horse Bridge; and at Wembley Central a new passenger bridge delivered for use during major events, improved access between the ticket hall and platforms with refurbishment at the station continuing.

6.33 These improvements have gone a long way towards cementing Wembley’s position as a public transport destination and, consequently, a location where major visitor attractions can be developed in a sustainable way. Nevertheless, there continues to be a need for improvements such as an improved ticketing hall when development takes place on sites adjacent to Wembley Stadium station. The Wembley Stadium station improvements have been secured through the extant outline planning permission on land surrounding Wembley Stadium Station.

6.34 In the meantime, improvements to orbital public transport are identified in the Core Strategy as being necessary if Wembley is to be enhanced as an accessible destination. Improvements to

orbital public transport are also seen by neighbouring authorities, Barnet and Ealing, as essential to facilitate growth in suburban outer London. It is Brent Council’s view that such orbital improvements should be focused on bus services and, along with Park Royal Partnership and Ealing Council, has been promoting a proposed new express bus service linking Wembley with Park Royal and Acton. Recent work undertaken by Transport for London, in association with West London Boroughs and key stakeholders/agencies/partnerships, and encapsulated in the Mayor’s West Sub-Regional Transport Plan, gives further credence to this approach with key links targeted for investigation between Ealing and Wembley and Ealing and Brent Cross.

6.35 There is an issue also about how far into the new urban quarter of Wembley that buses should penetrate, and whether they should be routed along the new Boulevard and shopping street or Olympic Way given the potential conflicts with shoppers and other pedestrians.

6.36 Furthermore, the availability of funding is a major consideration when considering alternative options for new public transport infrastructure. A strategy for bus services and infrastructure enhancements is continuing to be developed to further develop these priorities for improvement.

6.37 The council's priorities for bus service and infrastructure improvement are shown in the following table.

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Priorities for Bus Service Improvement

The council will:

- Further investigate options for providing improved interchange facilities at Wembley Stadium Station.
- Focus on significant bus service improvements to improve orbital access, including reducing journey times.

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Implement more bus priority schemes and improve interchange facilities between bus and rail.

Seek the routing of buses into the heart of the new urban quarter along the proposed new Boulevard and shopping street.

- Promote the environment for public transport users along Wembley Hill Road and Empire Way.
- Seek further bus service enhancements in the east of the area to provide improve connectivity to Wembley town, Wembley Stadium and Wembley Park stations.

Walking and Cycling

Pedestrians

6.38 If a modal shift away from the car is to be achieved, then enhancement of the pedestrian environment, together with public transport improvements, will encourage people to choose alternatives to the car. ~~Also;~~ The provision of interconnected, safe, well designed routes and attractive spaces where people can gather free from the intrusion of vehicles will help secure a pedestrian-friendly environment promote walking. A number of new public spaces have already been provided, such as an expanded Central Square in Wembley and the new Stadium and Arena Squares close to the stadium. ~~Further~~ Additional public spaces are required when further development takes place, as set out in the Core Strategy. ~~Clearly, Exclusively~~ Pedestrian streets will also provide a safe and attractive environment, especially for shoppers. The needs of all pedestrians, including disabled and older people, should be incorporated into the design of public space. While there is a general presumption that cycling may be acceptable in pedestrianized areas, an assessment of the overall risk will be necessary. ~~It is important also to recognise the benefits of cycling; both walking and cycling which can bring health benefits as well as delivering modal shift to help reduce carbon emissions.~~

6.39 Shared space can also be used to improve the public realm and environment for pedestrians. Shared space is a design approach that seeks to

change the way streets operate by reducing the dominance of motor vehicles, primarily through lower speeds and encouraging drivers to behave more appropriately towards pedestrians. Shared space is only appropriate in low-trafficked areas, such as the new residential district (Site W18). It will not be supported in through-routes.



Picture 6.4 Cycle Route

6.40 The needs of spectators coming to the Stadium are also important. There are still some locations where there is potential conflict between crowds and traffic, such as along Wembley High Road and the crossing of Wembley Hill Road by the White Horse Bridge. ~~It is also an~~ The option to remove the pedestrian ramp over Engineers Way to the Stadium from Olympic Way and replace it with steps could be considered as part of future development. This would mean, however, that an alternative east – west through-route for vehicular traffic would be needed, especially for event days. The council ~~considers that~~ supports the removal of the ~~pedway~~ pedestrian ramp and its replacement

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with an improved access arrangement between Olympic Way and the Stadium would greatly enhance the southern part of Olympic Way and remove what is currently a poor street environment. It would be supportive of the removal of the pedestrian ramps whilst ensuring providing that access to the Stadium and emergency egress are integral to the design, remains adequate and that any changes help address what is currently a poor street environment.

Cyclists

6.41 The provision of shared surfaces, where all the users of streets share the public realm, is a recognised way of improving the environment and safety of pedestrians and cyclists as it leads to much more considerate use by drivers of motor vehicles. Clearly, exclusively pedestrian streets will also provide a safe and attractive environment, especially for shoppers, and Brent is one of the Mayor's 'biking boroughs' with the intention of increasing cycling levels in outer London. There is an existing network of dedicated signed cycle routes (shown on Map 6.2) and stretches of secondary local routes which will provide a degree

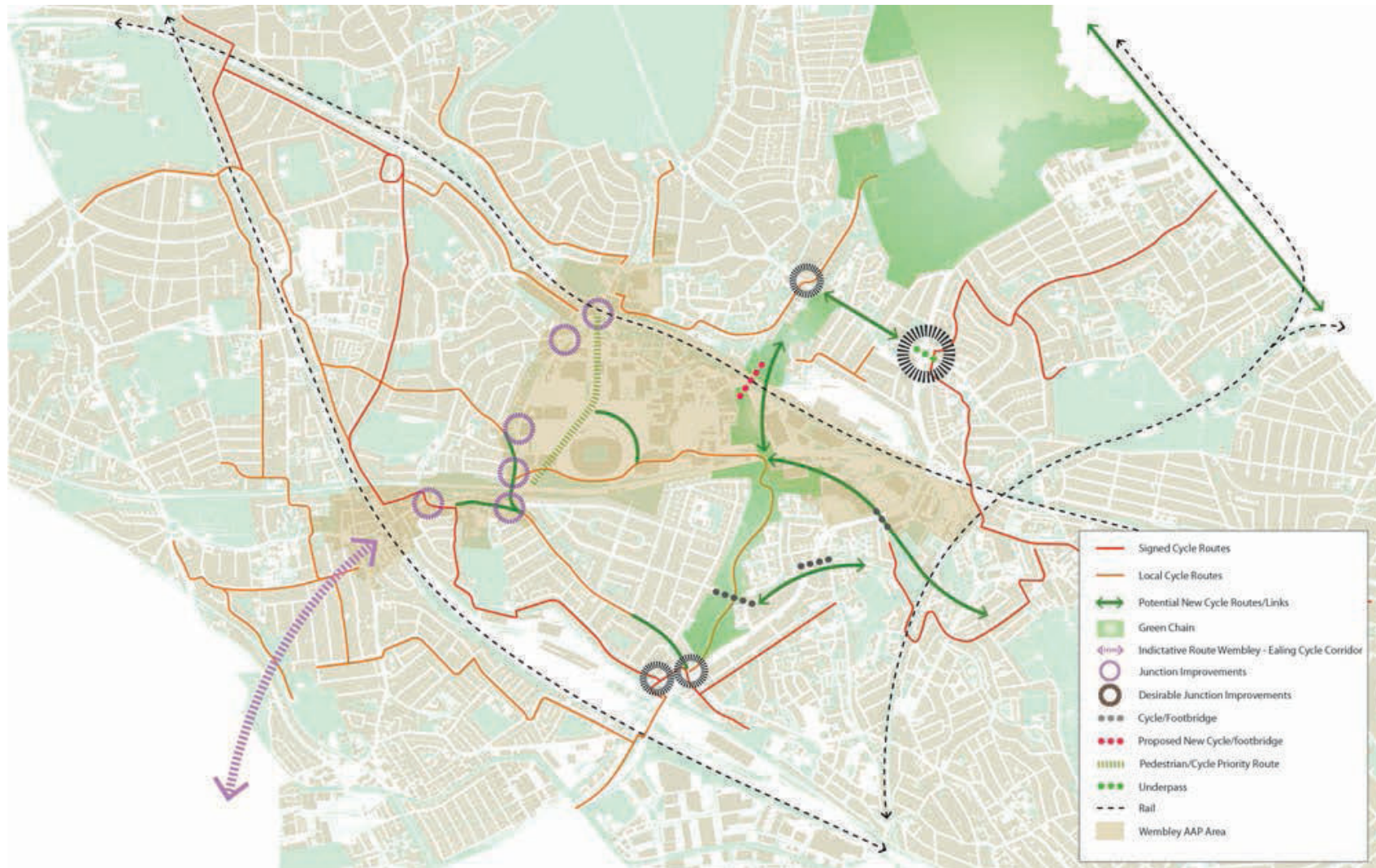
of encourage people to access into the area Wembley by bicycle. However, cycle links into Wembley are poor or non-existent with a number of physical barriers such as railways, the North Circular and the River Brent. Connections between Wembley and Willesden are particularly limited.



Picture 6.5 Cycle path, Great Central Way

6.42 The London Cycle Network (LCN+) aims to provide Map 6.2 shows existing cycle infrastructure, proposed improvements within the AAP area, and identifies possible new links across major barriers. The Wembley to Ealing cycle corridor is identified as a priority for infrastructure investment in Brent's Local Implementation Plan 2011-14 (LIP2). Improvements and new cycling infrastructure will be planned through the Local Implementation Plan, Strategic Infrastructure Plan, and Transport Strategy. Funding will be secured through developer contributions, the Biking Boroughs Programme, TfL and other future funding streams. convenient, safe and accessible radial and orbital linkages throughout London. Wherever possible, these should be segregated and protected from major road traffic. Limited facilities and routes exist in the Wembley area, therefore further enhancements would be desirable.

6 Transport



Map 6.2 Cycling Infrastructure

Transport 6

6.43 New cycling infrastructure should be safe and attractive to cycle users with varying levels of confidence and experience. Bikes and pedestrians travel at very different speeds and have conflicting priorities, and there should be clear differentiation of cycle and pedestrian space. Therefore, shared use routes, where cyclists and pedestrians share the same off-carriage way route without segregation, will not normally be appropriate.

6.44 Wembley's industrial estate attracts heavy good vehicles (HGVs) which are a particular threat to cyclists' safety, accounting for half of all cyclist deaths in London. Given that a primary function of the industrial estate is circulation and parking of HGV traffic, further work is needed to assess the suitability of cycle routes through the industrial area. Cycle routes are unlikely to be appropriate unless there is a segregated, protected cycle-only facility with cyclists given priority in space and time at junctions.

6.45 All routes which affect cyclists should be designed in line with prevailing best practice guidance. In particular, cycle lanes and junction improvements should address the vulnerability of cyclists through segregation and protection from major road traffic.

6.46 The council will work in partnership with key stakeholders, such as TfL, cycling groups and developers, to deliver and promote cycling initiatives. This includes creating effective local links to key destinations such as open spaces, town centres and strategic cycling corridors. Developers

will be required to integrate the needs of cyclists into the design of their schemes and provide cycle parking in line with London Plan policies. The council will liaise with TfL to increase the provision of secure public cycle parking at Wembley Park, Wembley Stadium and Wembley Central stations. Wembley regeneration area was identified as a potential Cycle Hub within the TfL Brent Biking Borough programme. Cycle Hubs are locations that have potential to increase cycling levels, and can be a focus for cycling investment and initiatives. The council will continue to promote Wembley as an area suitable for a Cycle Hub. Where appropriate, cycle hire initiatives will be supported, and options for a public cycle hire scheme, such as the Central London scheme, could also be considered.

6.47 Although some improvements to pedestrian and cycle facilities have taken place, there are still barriers to movement across the main rail lines which bound the eastern part of the area. A study into additional bridge crossings recommended a bridge over the railway lines (Underground and Chiltern) near St David's Close to overcome existing deficiencies as it was both feasible and offered substantial connectivity benefits by linking green spaces, for example from Fryent Country Park through at Chalkhill to development sites and provides a strategic link between existing and future footpaths along the River Brent and Wealdstone Brook. This proposed bridge is shown on the Proposals Map 6.2, and a plan showing the land take required to support this improvement is shown in Appendix C.

6.48 To ensure Wembley is a legible destination for visitors and tourists, the area will be made more accessible to pedestrians and cyclists through improvements to signage; particularly to local attractions, open spaces, cycle routes and canal.

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Walking and Cycling

~~Measures~~ The council will ~~seek to implement~~ to encourage walking and cycling by: ~~are~~:

1. Allowing shared surfaces in low trafficked areas in the new urban quarter close to the Stadium.
2. ~~Promote~~ Prioritising space for pedestrians, cyclists and public transport users in ~~Wembley the traditional~~ town centre and reducing the proportion of through traffic using routes through ~~Wembley the~~ town centre in ways that maintain capacity for vehicles on the wider network.
5. Ensuring e that any junction/ highway improvements and new streets are designed to prioritise take due account of pedestrian/ cycle access, convenience and ease of movement, and the need to ensure a high quality public realm.
3. ~~Provide exclusively pedestrian streets in locations with the heaviest footfall, and restrict servicing to early morning only.~~

6 Transport

Ensuring that streets and spaces are designed so that conflict between road users is reduced and vulnerable users are protected

Requiring appropriate cycling facilities, such as parking, showers and storage, as part of all major new developments and refurbishments.

Identifying new cycle routes and signage opportunities for commuting, leisure and local cycling trips

Maximising cycling investment in Wembley from all sources.

Providing a new pedestrian and cycle bridge over the Metropolitan/Jubilee/Chiltern rail lines near St David's Close to address existing deficiencies.

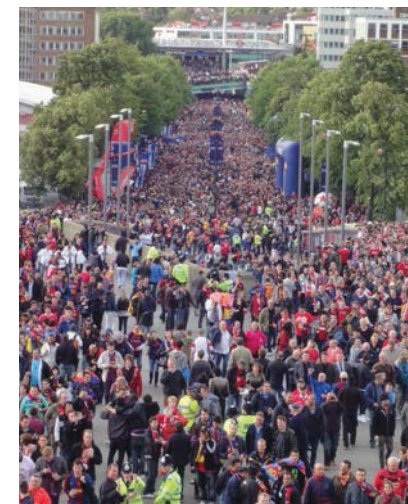
6. Enhance existing Increasing the provision of secure cycle parking and introducing a Cycle Hub within the area.

7. Continue to progress feasibility work on the Western Footbridge

area around the Stadium and Arena is currently subject to major redevelopment including housing, shopping, leisure and commercial uses with further significant development planned over the next 10-20 years. Most travel to events is by public transport but with crowds completing the last leg of their journey on foot. 2,900 car parking spaces are provided on major event days and key events can attract as many as 450 coaches. A temporary traffic and crowd management plan is activated on event days and the partial completion of the Stadium Access Corridor provides a tidal flow traffic system to be operated for vehicular travel to and from the North Circular Road.



Picture 6.6 Event day coach parking



Picture 6.7 Event day crowds

6.50 The key issues to be addressed include ensuring the safety and security of residents and visitors alike, providing a high quality pedestrian environment, and managing car and coach access and parking effectively. In many respects, a significant amount has already been achieved including increased public transport capacity and access improvements at Wembley Park Station and improvements for passengers queueing after events at Wembley Central and Wembley Stadium Stations, improved access through the development of the White Horse bridge linking the Stadium to Wembley town centre, and better vehicular access to and from the North Circular Road. However, there are still concerns over matters such as coach access and parking, maintenance and improvement of pedestrian facilities and crossings; maintenance and enhancement of the public realm; and providing

Major Event Related Activity

6.49 Wembley Stadium is a world renowned centre for sporting and other events regularly attracting crowds of up to 90,000 spectators. In addition, other attractions take place at Wembley Arena with a capacity of 12,500 attendees. The

Transport 6

a balance to maintain public security and safety whilst allowing major development to function and prosper.

6.51 Our strategy aims to make use of available additional capacity which is provided for event days, but use of which may not be maximised during non-event times for access to and mobility within Wembley town.

6.52 Other measures the council will seek to implement to improve event day transport are:

1. Introduce more effective signage for pedestrian and vehicular travel
2. Provide an enhanced pedestrian environment and introduce high quality public realm improvements without detriment to residents and visitors alike
3. Provide new crossing facilities, primarily for spectators walking to the stadium, across Wembley Hill Road.
4. Efforts will be made by the Council to reduce the impact of pirate car parking.
5. The Council will work with the Stadium to review and develop the current event day traffic management arrangement to optimise traffic flow along the Harrow Road route.

WEM 18

Event Related Transport

In considering the location of new coach parking for Wembley Stadium, any new facility should:

- Be within 960m crow fly distance from the centre of the Stadium;
- Vehicular access and egress from the coach park must not conflict with event day pedestrian movements
- Have an appropriately sized dedicated pedestrian route to the Stadium
- Be easily accessible from the major highway network especially the North Circular Road
- Be located away from the town centre to avoid the need for coaches to use town centre roads
- Be sufficiently large to allow coaches to manoeuvre easily
- Be flexible to allow use by cars if required

Priorities for Investment

6.53 The range of transport improvements that can be promoted as part of an overall package of improvements in the Wembley area will require a significant level of investment. Some of this investment will be delivered as part of the development process and some will be drawn from

local and regional funding e.g. [LIP](#), TfL, [s106](#), [CIL](#), [London Growth Fund](#). However, there are limits as to the amount of funding available and the council has, therefore, identified priorities for scheme funding and will produce a programme for implementation alongside other priorities in key areas such as education, housing and community infrastructure.

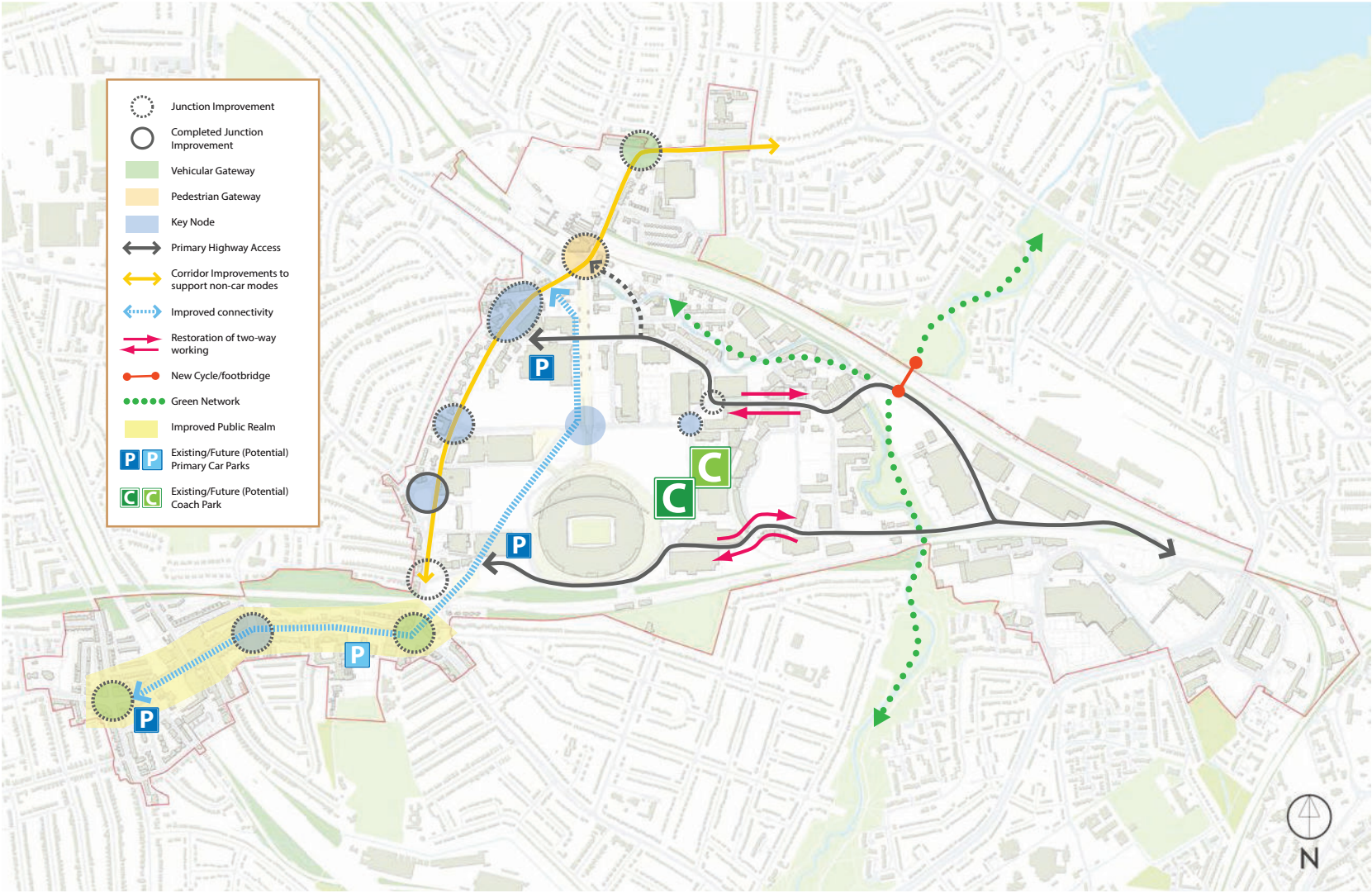
Evidence Base - Transport

- Wembley Parking Standards (Steer Davies Gleave, December 2012)
- Gearing Up: An investigation into safer cycling in London (GLA, November 2012)
- Wembley Highways and Bridge Study (Atkins, July 2012)
- Wembley Parking Strategy (MVA, July 2012)
- Strategic Corridor Study (WestTrans, March 2012)
- Brent's Local Implementation Plan 2011-2014 (LBB, July 2011)
- West Sub-Regional Transport Plan (GLA, November 2010)
- Mayor's Transport Strategy (GLA, May 2010)
- Mayor's Cycle Safety Action Plan (GLA, March 2010)
- Wembley Masterplan (LBB, June 2009)
- Wembley Transport Strategy Key Component Study (MVA, February 2009)

6 Transport

- Wembley Masterplan Transport Review (MVA, November 2008)

- Draft London Cycling Design Standards (TfL,)



Map 6.3 Transport Improvements

7 Housing

Strategic Policy

7.1 The National Planning Policy Framework (NPPF) aims to deliver a wide choice of high quality homes and to boost significantly the housing supply. Local planning authorities should identify deliverable sites and set out an approach to housing density which reflects local circumstances.

7.2 The London Plan sets out a target for housing provision for Brent, and the Core Strategy has reflected this in policy CP2 which provides for at least 22,000 additional homes between 2007 and 2026, of which 11,500 are to be delivered in Wembley. The borough also aims to achieve a target that 50% of new homes should be affordable and that at least 25% of new homes should be family sized in accordance with London Plan policy 3.8 on Housing Choice.

7.3 The council promotes additional housing as part of mixed use development in town centres where public transport access is good.

7.4 Policy CP21 of the Core Strategy seeks to maintain and provide a balanced housing stock in Brent by ensuring that new housing appropriately contributes towards the wide range of borough household needs including:

- An appropriate range and mix of self contained accommodation types and sizes, including family sized accommodation on suitable sites
- Non-self contained accommodation to meet identified needs

- Care and support accommodation to enable people to live independently
- Residential care homes which meet a known need in the borough

7.5 Policy CP22, Sites for Nomadic Peoples, protects the existing Lynton Close Travellers site and sets criteria that proposals for new sites should meet.

7.6 The Mayor of London has recently consulted on draft alterations to the London Plan to amend policy to take account of affordable rent in the definition of affordable housing.

Policy Context

7.7 Wembley is a residential neighbourhood as well as a visitor destination. In bringing forward new development it is important to bear in mind that the Wembley area should also become a healthy and sustainable community. Over 5,000 homes have already been granted planning consent in Wembley and there is scope to accommodate more than double this number. Critical to the success of Wembley as a residential area is the need to ensure a suitable balance of unit size and tenure. Whereas the sites immediately adjacent to the Stadium were not considered particularly appropriate for family accommodation, this is not the case for subsequent phases of the area's development and, accordingly, there is scope for greater provision of family housing.

Housing Need & Mix

7.8 Brent's Housing Needs Survey 2004 and the West London Strategic Housing Market Assessment 2010 show an affordable housing requirement that outstrips total housing supply. The high demand for affordable housing is unlikely to change over the lifetime of the Core Strategy. In order to meet current and future demand for housing, the council expects that a significant amount of residential provision will be met within the Wembley area. The majority of new buildings within the Wembley area are likely to contain a mix of uses, with commercial and retail uses at ground floor and residential above. This will create areas that are animated throughout the day and allow for sustainable environments where people can live and work in the same building, thus reducing the need to travel. Introducing residential uses at lower levels may be appropriate in selected buildings as a means of establishing a variety of character on certain streets, particularly in the North East area where more family homes could be located.

7.9 The Wembley Masterplan identifies the North East District as being appropriate for a higher proportion of family housing. Table 7.1 gives indicative proportions for the different areas. Typically (based on 60:40 market to affordable ratio) the North West and First Way districts could deliver around 19% family housing and the North East District around 30% family housing. The council recognises that a mixed and balanced community should contain a range of homes for groups that are often socially disadvantaged and

Housing 7

considers that there will be locations where market provided sheltered housing will be suitable. One of the council's current priorities is the provision of extra care housing for the elderly.

7.10 It is not always easy to accommodate families in higher density housing and it will be essential to make sure that, where possible, ground floor units are provided. At higher levels, balconies, terraces and roof spaces will be required for amenity provision to supplement that provided at ground level.

7.11 Brent Council supports the current Mayor of London's desire for more affordable family sized homes. There is a need to provide for family housing to encourage people to stay and contribute to the establishment of a long term mixed and sustainable community. It is not the intention of the council to build a large transitional location for single people and childless couples who may be forced to move on because there is no choice of family homes available. The proportion of larger social rent units set out below follows the proportions set out in the West London Affordable Housing (WLAH) Investment Guide 2008-11, and is broadly in line with the London Housing Strategy target that 42% of social rent and 16% of intermediate homes be family sized homes having three bedrooms or more, but recognises the practical difficulty of providing such a high proportion of social rented 4 bed+ homes in Wembley. Instead, a split with a higher proportion of 3 bed units is proposed.

Beds	%* of units Social/ Affordable Rent		%* of units Intermediate		%* of units Sale/Market		WLAH Investment Requirement Social Rent (2008-11)
	NW/ First Way	NE	NW/ First Way	NE	NW/ First Way	NE	
1	15	10	45	40	30	30	15
2	35	40	45	40	55	45	35
3	45	40	10	20	15	25	25
4+	5	10					25

Table 7.1 Indicative new household sizes by tenure (% refer to units)

7.12 New Affordable Rent that meets the needs of households eligible for social housing, with eligibility determined with regard to local incomes and local house prices, at a cost low enough for them to afford will be accepted as part of the tenure mix in order to maintain a new supply of affordable housing in Wembley. A policy on Affordable Rent will form part of the borough's Development Management policy document. Introduction of different affordable housing tenures into the Wembley housing mix, for example market sale

~~products, will be considered where demonstrable housing need can be met and viability grounds evidenced.~~

Affordable Housing

Proportion of Affordable Housing

7.13 Brent Council will seek the maximum amount of affordable housing in line with London Plan policy 3.11, subject to viability and the achievement of other planning objectives.

7.14 The council will work closely with its partner Registered Providers (RPs), who are key stakeholders in Wembley and across Brent. Partners are selected on the basis of their wide range of community development services and their experience of supporting regeneration initiatives to create sustainable communities. They will build affordable homes to high design and quality standards, promote resident involvement in their activities and support initiatives to promote training, employment, community development and quality of life within the new Wembley.

Affordable Rent

~~**7.15** The reduction in capital funding for affordable housing under the Comprehensive Spending Review 2011-15 will significantly curtail the delivery of traditional new build social rented housing at target rents in the short to medium term. In June 2011 a new category of affordable housing was added for planning purposes.~~

7 Housing



Picture 7.1 Forum House, Empire way

7.16 Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent, including service charges. Affordable rent now forms part of the tenure mix in Wembley in order to maintain a new supply of affordable housing in Wembley in the short to medium term, and support regeneration and growth in the borough. In line with the NPPF and the London Plan, the council will require Affordable Rent housing to meet the needs of households eligible for social housing at a cost low enough for them to afford, determined with regard to local incomes and local house prices. Affordable Rents, inclusive of service charge, will need to be set well below 80% of the local market rents in certain cases in order to meet this affordability requirement, for example, on development of larger family accommodation which will be occupied by households with a greater

number of dependents. The council will provide further guidance on new Affordable Rent in its Tenancy Strategy.

WEM 19

Affordable Rent

Affordable Rent subject to rent controls that require a rent of no more than 80% of the local market rent, including service charges, are an appropriate part of the tenure mix in Wembley.

Affordable Rent will be required to meet the needs of households eligible for social housing at a cost low enough for them to afford, determined with regard to local incomes and local house prices.



Picture 7.2 Ada Lewis House, Empire Way

Housing Mix (tenure and unit size)

7.17 In line with the London Plan and the Core Strategy, the maximum reasonable amount of affordable housing will be sought on individual private residential and mixed use schemes, having regard to a number of considerations, including financial viability. London Plan Policy 3.11 sets a strategic objective that new affordable housing be provided at a 60:40 social rent to intermediate housing ratio. In Brent, because of local need, a broad objective of 70:30 has been set and, within this, different affordable housing tenure ratios can be better suited to specific circumstances, informed by such factors as the need to balance existing area tenure profiles to support sustainable

Housing 7

communities, the character of an area and the form and density of new development, financial viability and funding availability.

7.18 Table 7.1 is based upon the Wembley Masterplan housing mix and provides specific guidance for First Way / North West Lands and North East Lands unit size mix. However, permissions granted already, which will provide the bulk of the delivery in the area, are failing to deliver against this in certain respects.

7.19 The current Wembley housing mix has been informed by Brent's Housing Needs Survey 2004 and the West London Strategic Housing Market Assessment 2010 and is considered appropriate to meet the wide range of household needs in the borough. The current Wembley housing mix guidance will therefore be adopted by the Wembley Area Action Plan. However, as indicated above, new Affordable Rent will be part of the tenure mix in order to maintain a new supply of affordable housing in Wembley. Site proposals will also provide specific guidance on mix where sites are located outside the Wembley Masterplan districts, or where sites are viewed as being more suited to a particular housing mix. The council will encourage intermediate affordable housing tenures, such as discounted market sale products, where the council can secure future equity payments that can be recycled into new affordable housing

WEM 20

Housing Mix

The housing mix guidance provided in table 7.1 will be applied in the relevant parts of Wembley. Additionally, new Affordable Rent that meets the needs of households eligible for social housing, with eligibility determined with regard to local incomes and local house prices, at a cost low enough for them to afford, will be accepted as part of the tenure mix.

The council will encourage intermediate affordable housing tenures, such as discounted market sale products, where the council can secure future equity payments that can be recycled into new affordable housing.

Proportion of Family Housing

7.20 Given the limited supply of larger family housing and high levels of overcrowding in the borough, there is a pressing need to deliver larger family housing of three bedrooms and greater. This is reflected in the Core Strategy, that development should achieve at least 25% 3 or more bedrooms. Consideration will be given to the suitability of sites in the Wembley area to be dedicated to more suburban, low to mid rise, terraced housing, or possibly stacked maisonettes, such as at:

- North East Lands

- Brent House / Copland School site
- Chiltern Line Embankment

7.21 The Core Strategy target that at least 25% of new homes should be family sized with 3 bedrooms or more is an overall borough-wide target. Given the significant capacity for new housing identified in the Wembley Growth area this target will apply in Wembley. Further guidance on the appropriate unit size mix for new housing in Wembley is set out in Table 7.1, which identifies the North East District as able to provide a higher proportion of family housing.

7.22 An analysis of sites within the Wembley area has identified a number that are considered suitable for development of family housing. These sites are detailed in the Site Proposals section of the Plan and are predominantly located in more peripheral areas and adjacent to existing low rise housing and close to open space.

WEM 21

Family Housing

At least 25% of new homes in Wembley should be family sized, with 3 bedrooms or more.

The North East Olympic Way district is identified as suitable for a higher proportion of larger family housing. See also Site Proposals W25 and W26, where a higher proportion of family housing is sought.

7 Housing

Supported Housing

7.23 Supported housing need in the borough accommodates a wide range of client groups, which include some of the most vulnerable people in the borough, including frail elderly people and individuals and households with multiple, complex needs. The provision of new care and support accommodation, as well as the remodelling of existing facilities to enable people to live more independently, is a strategic priority for the borough. As the lead growth area, Wembley is expected to deliver a new supply of predominantly self-contained one and two bedroom accommodation that can help address these needs.

Extra Care Housing

7.24 Brent's Extra Care Housing Strategy identifies demand for 300 units of Extra Care accommodation over the period 2010-15. Extra Care housing comprises self-contained homes with design features and support services available to enable self-care and independent living, with the level of care and support tailored to individual needs. Extra care housing is popular with people whose disabilities, frailty or health needs make ordinary housing unsuitable but who do not need or want to move to long term care in the form of residential or nursing homes. Older people make up the majority of users of Extra Care. However, people with disabilities that are not age related are increasingly making use of this type of housing. 20 units are currently under construction at Charles Goddard House, High Road, Wembley. The only

other site in the Wembley area identified for extra care housing is in Vivien Avenue. The most suitable sites within the Action Plan area are likely to be those on the periphery of the main regeneration area, such as in the North-East District shown in the Masterplan, where amenity and access to open space are better. An example of such a site, should housing development be brought forward, is Watkin Road (see site proposal WEM 26).

WEM 22

Extra Care Housing

An element of extra care housing will be sought on appropriate sites. These will generally be sites where proposed development is primarily residential, where residential amenity is good and where it is near to open space.

Housing Needs of Disabled People

7.25 Information from the 2001 Census indicates that 15.6% of Brent's population and 14.6% of the West London population had a limiting long term illness or disability.

7.26 The West London Strategic Housing Market Assessment refers to recent Local Authority survey data in West London that indicates that 14% of all households contain someone who has a special need, including 9.3% of households which contained at least one member with a physical

disability. Other special needs groups prevalent in households include frail elderly people, as well as people with mental health problems, impaired sight or hearing, and people with learning disabilities.

7.27 In line with London Plan policy 3.8, Brent requires all homes be built to Lifetime Homes standards and 10% to be wheelchair accessible or easily adaptable for residents who are wheelchair users. This will be applied to all relevant proposals in Wembley. Where there is an ostensible difficulty or failure in the private sector to deliver more than only new homes easily adaptable for residents who are wheelchair users, the council may take the position of concentrating wheelchair housing in new affordable homes in order to provide fully wheelchair accessible housing for physically disabled people.

7.28 Loss of existing supported housing schemes will be resisted under Core Strategy policy CP21, which protects existing accommodation that meets known needs. In such cases where existing facilities cater for a particular supported housing need for which there is currently no demand, efforts should be made to remodel and adapt such facilities to current supported housing needs. More generally, new supported housing facilities should be designed wherever possible with a view to flexibility and the need to adapt to changing and future patterns of supported housing demand.

Housing 7

WEM 23

Wheelchair Housing and Supported Housing

10% of new housing in Wembley should be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.

Loss of existing supported housing schemes in Wembley will be resisted.

The council will support proposals for smaller supported housing schemes for more specialist groups that are designed to provide self contained accommodation and communal facilities, and which are sufficiently flexible to accommodate a range of support and care services so they can be adapted to meet different needs as priorities change over time.

Private Rent Sector

7.29 Brent has one of the largest private rent sectors in London, with approximately 20,000 dwellings representing over a fifth of the private sector stock. The private rented sector market consists mainly of assured shorthold tenancy lettings that meet demand from a diverse group of households and offers a great deal of choice due to its high turnover, thus enabling tenants to live in the best quality housing that they can afford,

allowing for constraints over location. The private rented sector is an essential resource with a number of constituent niche markets that meet a variety of housing needs, from high income renters in corporate lettings, economically active people unable to access home ownership opportunities, homeless families receiving housing benefit and in temporary accommodation, to slum rentals at the bottom of the sector where landlords accommodate often vulnerable households in extremely poor quality properties.

7.30 Effective partnership with landlords under private sector leasing arrangements has been central to the council's work in tackling homelessness, in terms of both temporary and permanent solutions. At the same time, the sector is dominated by smaller landlords and, while many of these provide a good service to tenants, the sector still contains some of the worst conditions and poorest standards of management. In essence, the priorities are to facilitate access and sustain occupation in the private rented sector while improving supply on the one side and enforcing standards on the other.

7.31 Wembley is a town centre location that represents an opportunity to deliver a new type of private rented accommodation. The council is keen to see private rented accommodation delivered at a scale that can support more professional and less fragmented management, as well as greater stability and longer rental periods. The council recognises the financial challenges of delivering a new supply of high quality private rented sector

accommodation and will, therefore, seek to stimulate greater institutional investment in private rented accommodation that can offer a quality housing option accessible to people on low incomes, but also form part of a truly mixed housing solution open to people in a wide range of circumstances. The council is prepared to take a flexible approach to housing unit size mix and the proportion of affordable housing on viability grounds, where it is assured that such provision can deliver high standards of accommodation and housing management at affordable rents, and that appropriate long term financial and nominations arrangements can be secured.

WEM 24

Private Rented Sector

The council will encourage the development of purpose-built private rented sector accommodation where dwellings are of demonstrably good design and there are suitable long term financial, management and nominations arrangements. Where such accommodation can be delivered, the council will be flexible on housing unit size mix and the proportion of affordable housing, if that accommodation, or a reasonable proportion thereof, can be made available at or below local housing allowance levels.

7 Housing

Student Accommodation

7.32 Policy 3.8 of the London Plan states: “Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality.” The policy, which acknowledges that London's universities make a significant contribution to its economy and labour market, aims to ensure that London's universities attractiveness and potential growth are not compromised by inadequate provision for new student accommodation.

APPLICATION	STATUS	ROOMS
Quintain North West Lands	Cttee approved 12.05.11 subject to s106 and GLA approval	up to 880
Dexion House	Consent granted 14.06.11	661
Quintain iQ	To be completed by summer 2012	660
Kelaty House	Consent granted 26.10.12	599
Victoria Hall	September 2011	435
	Total	2,636

Table 7.2 Permissions for student accommodation in Wembley

7.33 The situation in Wembley can reflect the continuous growth of the student accommodation sector. Over the past few years, a number of major planning applications for Wembley have involved student accommodation. By 2012, 1,095 new

student rooms will be completed. Further student accommodation proposals are in the pipeline which would provide 2,636 bedrooms in total.

7.34 The student accommodation sector in the UK has been growing particularly when other investment sectors are still volatile. The situation in Wembley can reflect the continuous growth of this sector. Wembley is well served by public transport and it takes only 10 minutes by rail to get to Central London where most of the higher educational institutions are based. Over the past few years, a number of major planning proposals in Wembley have involved student accommodation that would provide around 2,600 student bedrooms in total if all are implemented. This will result in almost 10% of the new population for Wembley Growth Area being students.

7.35 The London Plan recognises that London's universities make a significant contribution to its economy and labour market. It is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation. New provision may also reduce pressure on other elements of the housing stock currently occupied by students, especially in the private rented sector. Nevertheless, the requirements for student housing should not compromise capacity for conventional homes.

7.36 Brent acknowledges that students can contribute significantly to the local economy. However, an increase in student population can also put pressure on some types of services and

facilities such as leisure and health facilities. Another issue is that student accommodation use is competing with other land uses which can provide more employment opportunities or relieve identified housing need within the borough. If purpose-built student accommodation developments are to be successful, they must be located and managed to minimise adverse impacts on the surrounding community and also be in locations which will be attractive to students. Appropriate locations include, for example, Chesterfield House and Dexion House.

Housing 7



Picture 7.3 Student housing under construction in North End Road

WEM 25

Student Accommodation

To avoid over-concentrations of purpose-built student accommodation, and to meet conventional housing need, an element of student accommodation will normally be allowed at locations where major mixed use

development is appropriate, subject to consideration of whether it would undermine the delivery of conventional housing.

In order to maintain a balanced community the development of purpose-built student accommodation will be controlled. Student accommodation developments will not be allowed once the total number of approved student bedrooms exceeds 20% of the projected increase in population in the Wembley Growth Area.

Nomadic People

7.37 The existing Lynton Close travellers site is located within the Wembley Area Action Plan area and is the only travellers site within the borough. The site provides 45 pitches and is adjacent to an aggregates transfer depot.

7.38 The London Boroughs' Gypsy and Traveller Accommodation Needs Assessment (GTANA) identifies the need for between 7 and 13 additional pitches in Brent over the period 2007 to 2013.

7.39 Brent's entire current provision of accommodation for nomadic peoples is on the existing Lynton Close travellers site. With 45 pitches, the GTANA identifies Brent as having the second highest number of pitches amongst London boroughs. Therefore, whilst there may be an identified need for additional pitches in Brent, an increase in the provision of accommodation for

nomadic peoples locally would be considered an over-concentration of such accommodation within the Wembley area.

Evidence Base - Housing

- West London Strategic Housing Market Assessment (Opinion Research Services, November 2010)
- London Housing Strategy (GLA, February 2010)
- Brent Extra Care Housing Strategy 2010-2015 (LBB, draft 2010)
- Wembley Masterplan (LBB, June 2009)
- Brent Gypsy and Traveller Accommodation Needs Assessment (Fordham Research, March 2008)
- West London Affordable Housing Investment Guide 2008-11 (West London Housing Partnership, July 2007)
- Brent Housing Needs Survey (Fordham Research, June 2004)

8 Town centres, shopping, leisure and tourism

Strategic Policy

8.1 The Wembley area currently includes two town centres; Wembley town centre to the south west and Wembley Park to the north. Wembley and Wembley Park are designated as a Major Centre and a District centre respectively within the London Plan and the council's Core Strategy. A fundamental aspect of both National Policy, as set out in the National Planning Policy Framework, and in London Plan policy 4.7, is the sequential approach to development whereby development should be focused on sites in town centres first and, only if no in-centre sites are available, on sites on the edges of centres. Policy 2.15 of the London Plan also promotes the extension of existing centres where appropriate, and providing that it is co-ordinated strategically, and policy 4.8 states that borough LDFs should take a proactive approach to planning for retailing, including bringing forward capacity for additional comparison goods retailing.

8.2 The London Plan identifies Wembley as a Strategic Cultural Area where London's major clusters of visitor attractions are located. Policy 2.16 promotes Wembley as a Strategic Outer London Development Centre with a strategic function related to leisure, tourism, arts, culture and sports which is considered to be an economic function of greater than sub-regional importance.

8.3 The strategic policies outlined above are reflected in Brent's Core Strategy. This promotes Wembley as the main focus of new retail and town centre uses where the town centre will be expanded

eastwards into the Stadium area in accordance with the sequential approach (CP16). Policy CP1 states that Wembley will deliver most of the borough's new development, including retail and office growth as well as being the primary location for new hotels and the focal point for tourism and large scale visitor attractions. Policy CP7 highlights the key role of Wembley in driving economic regeneration including development of the range of uses appropriate to an expanding town centre and Strategic Cultural Area. A further 30,000 sq m net of new retail floorspace is proposed over and above that granted planning consent up to July 2010 2011.

Policy Context

Wembley Park

8.4 Wembley Park is designated as a District Centre, extending both north and south of Wembley Park underground station. Wembley Park contains almost 16,400sqm of floorspace, of which 95% (15,600sqm) was in retail (A class) use in 2008. The presence of Asda, Lidl and other smaller grocery stores means that Wembley Park is dominated by convenience goods accounting for 60% of the total floorspace in the centre (10,000sqm). The centre contains a high proportion of food and drink uses, mostly restaurants, cafes and takeaways (10% of total floorspace).

8.5 There are no development opportunities identified within the centre itself - currently approved applications lie outside the town centre boundaries.

South of the centre, construction has started on a new Wembley designer outlet centre and cinema and food and drink complex alongside the new Wembley pedestrian boulevard. Also, in 2011 planning consent was granted for a new retail street which will link the Boulevard with Wembley Park centre. This will be a further extension of Wembley town centre as the new boulevard will extend from close to Wembley Stadium station eastwards to Engineers Way.

Wembley Town Centre

8.6 Wembley town centre has approximately 67,850 sq m of retail floorspace. The nearest Metropolitan town centres of Ealing and Harrow as well as Brent Cross regional shopping centre are substantially bigger. Wembley, however, has considerable scope for expansion as there is a large amount of potential development land, particularly to the east of the centre. In 2009, the GLA Town Centre Health Check survey, estimated that unimplemented planning permissions accounted for 2.88 hectares – the ninth largest amount of land in London.

Town Centre Hierarchy

8.7 In 2003-04, data from an index of the rank of shopping centres in the UK showed that Wembley was a declining centre and has been falling down the UK shopping centre index ranking. In 2003-04 Wembley was ranked in 491st place in the UK shopping index, which represents a fall of more than 200 places from its position in 1995-96. However, Wembley's vacancy rate has been falling;

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18.4% in 2005 to 4.7% in 2007. Despite the recession, the vacancy rate has marginally decreased further to 4.3% in 2009. The council's adopted Core Strategy seeks to continue to reverse this decline, improve its position in the shopping hierarchy and increase the amount of floorspace in the centre in line with capacity and growth forecasts.

Convenience and comparison floorspace

8.8 In 2009, 17,700 sq m of Wembley town centre's floorspace was comparison goods, accounting for 26% of total floorspace.

Convenience floorspace accounted for only 6,670 sq m (9.8%) whilst 17,430 sq m (25%) was service floorspace.

8.9 Strategic Industrial Area

8.10 The SIL contains established out-of-centre retail uses which provide employment and economic benefits to the local area. Proposals to improve these existing retail facilities will be supported providing they remain local in nature.

Potential for retail growth in Wembley

8.11 Brent Retail Needs and Capacity Study 2008 reviewed the level of retail growth that could be accommodated across Brent's town centres. For the comparison goods allocation, it was recommended that 27,000 sq m would be required up to 2026, to be located primarily in Brent's two major town centres. However, given the lack of

available sites in Kilburn, the approach in the Core Strategy is to identify Wembley as the main location for this growth.

8.12 For the convenience goods allocation, the total requirement of 12,500 sq m up to 2026 was considered to be sufficient for at least two new medium sized food stores within the borough as a whole.



Picture 8.1 Central Square

Civic, leisure, hotel and conferencing uses

8.13 Brent council's new Civic Centre is to be located within the heart of the new Wembley, close to the stadium. The Civic Centre will provide civic and community uses, as well as some conferencing facilities. Other new developments will also contribute to this offer including two schemes which are currently being constructed including the new Hilton Hotel and Shubette House. A new swimming pool has also been approved as part of an application for a mixed use scheme at Dexion House. Wembley Stadium provides conferencing accommodation on non-event days.

8.14 Although conferencing facilities have been a key part of the council's vision for Wembley, conferencing facilities have been scaled back in recent years following the loss of the Wembley Conference Centre and associated exhibition space, and the council's vision for Wembley is to re-provide these uses in the form of a Convention Centre. While many of the land owners within Wembley do not consider these uses to be overly profitable, there is some appetite to provide these on a smaller scale, creating an agglomeration of these uses which could collectively meet the council's vision for the area.

Wembley as a cultural destination

8.15 Wembley has a number of cultural assets, including the National Stadium, Fountain TV Studios and Wembley Arena, with the area hosting some events for the 2012 Olympics. The Wembley

8 Town centres, shopping, leisure and tourism

AAP seeks to build upon this cultural and artistic offer and further promote Wembley as a cultural destination.



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Picture 8.2 New cinema & retail outlet stores

Expansion of the Town Centre

8.16 Wembley's town centres currently perform roles in providing primarily for the local community as well as to visitors for events at the Arena and Stadium. Core Strategy policy seeks to extend Wembley's retail offer, and this could potentially impact on existing centres if it is allowed to develop in an unplanned way. The vision for Wembley identifies a number of specific town centre uses across the area, including meeting local convenience needs within the existing Wembley town centre, providing service related retail at

Wembley Park for Stadium visitors and providing more specialist or niche retail uses across the new part of the centre extending to the east of the High Road.

8.17 Planning policy for the town centre should be sufficiently flexible to allow for appropriate development to be attracted to the area, which will expand the town centre, whilst protecting the key roles that different parts of the area perform, especially in meeting the needs of the local community. For this reason it is considered important that these different roles are made explicit and that they should be protected and enhanced where appropriate.

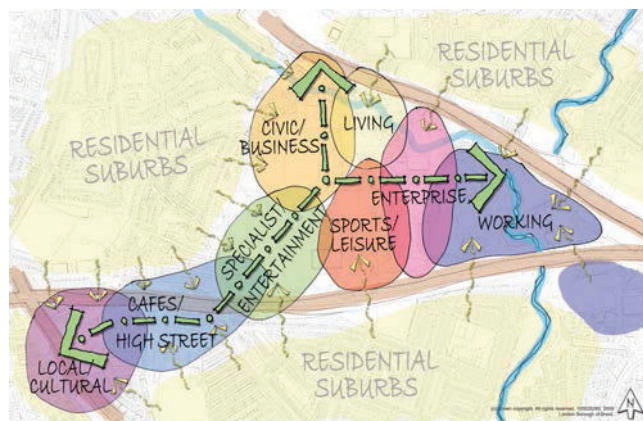
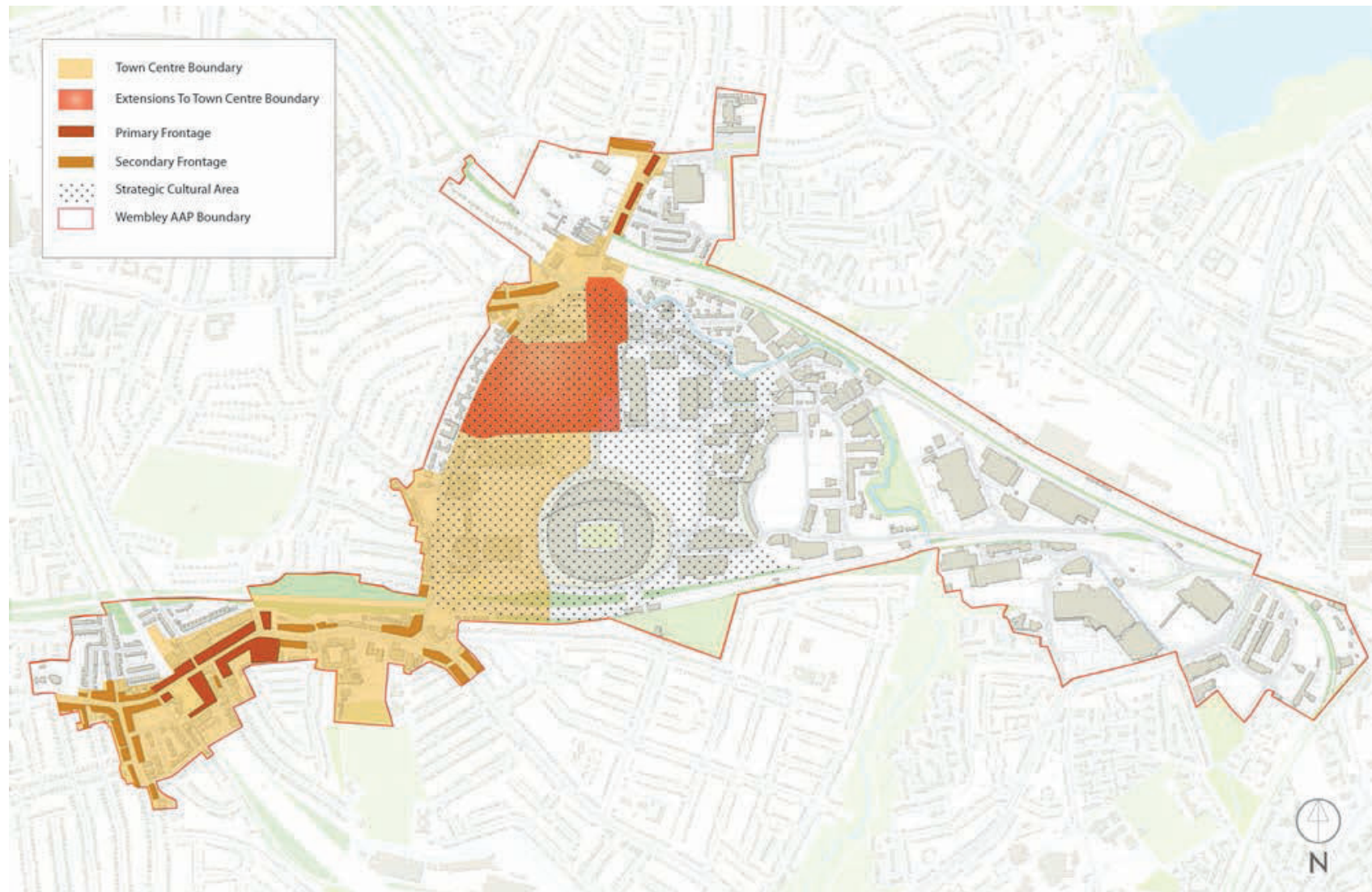


Figure 8.1 Diagram from Wembley Masterplan showing indicative roles for parts of the area

8.18 The boundary of Wembley town centre defined in the Core Strategy takes account of, and includes, land where consents have been granted for retail expansion. This includes land at South Way close to Wembley Stadium station as well as the proposed outlet centre, cinema, etc., currently under construction to the west of the Stadium. However, since the Core Strategy was adopted in 2010, consent has been granted for a further 30,000 sq m of new floor space on the NW Lands to provide a new shopping street between the two centres. When all schemes are implemented, there will be largely continuous active frontage from Ealing Road to Bridge Road. It is logical to define the town centre from Wembley Park to Ealing Road as shown on Map 8.1. This includes the office buildings and hotel on the east side of Olympic Way. Within this, the long-standing designated Primary and Secondary frontages will remain largely as currently defined for the present, although the council is committed to reviewing these once the new retail and leisure developments (Quintain stage 1 and North West Lands) are built out and open.

Town centres, shopping, leisure and tourism 8



Map 8.1 Town Centre Designations

8 Town centres, shopping, leisure and tourism

WEM 26

New retail, ~~leisure and office~~ development

New retail, ~~leisure and office~~ development will be directed to the town centre as defined on the Proposals Map. Edge of centre retail ~~and leisure~~ development will be considered appropriate only when existing town centre sites have been developed or where the proposed use, because of its size, is incapable of being accommodated on an existing town centre site.

Outside of the town centre, ancillary retail function as part of a major leisure, tourism or cultural use may be acceptable in the Strategic Cultural Area.

Large foodstores (over 2,000 sq m gross) will be directed to sites within or adjoining Wembley High Road.

Improvements to existing local retail uses in the SIL are supported.

Shops (Use class A1) will not generally be appropriate on the eastern side of Olympic Way.



Picture 8.3 Specialist jewellery shop in Wembley



Picture 8.4 Wembley Big Dance Event

Leisure, Tourism and Cultural uses

8.19 Wembley has long been a focal point for leisure, tourism and cultural uses and is identified in the London Plan as a Strategic Cultural Area where this type of development is encouraged. These include sports and leisure provision, tourist and visitor attractors, hotels and conference facilities. Often these uses are of a scale, and consequently have a level of impact, which is may not be conducive to a traditional town centre location. However, land to the east of the area, including the current stadium car park, for example, is capable of accommodating such uses and as such is designated as Wembley Strategic Cultural Area. Development in this area can also help create a buffer against the impact from waste operations and other 'bad neighbour' uses to the east.

WEM 27

Leisure, Tourism and Cultural uses **Strategic Cultural Area**

Major leisure, tourism, and cultural uses are encouraged within the Strategic Cultural Area area shown on the Proposals Map. Major leisure, tourism and cultural development is appropriately located on sites to the east of Olympic Way as shown on the Proposals Map. Leisure, tourism, and cultural uses can form part of a mixed use scheme, including office and residential, where appropriate. Significant

Town centres, shopping, leisure and tourism 8

improvements to public transport will be required where development will attract a large number of trips.



Picture 8.5 Wembley Arena

Hot Food Takeaways

8.20 Wembley has a large number of takeaways and fast food outlets, partly as a result of demand generated by those attending events at the Stadium

and Arena. While takeaways can make a positive contribution to the local economy and community, there is evidence that large concentrations of fast-food takeaways contribute to unhealthy lifestyles particularly amongst young people and, consequently, they are considered to be a particular problem when located close to schools because of links with childhood obesity. There is some evidence that suggests that "increased geographic density of fast food restaurants and convenience stores is also related to increased BMI". ⁽¹⁾ It is becoming more widely accepted that it is appropriate to control such uses in certain locations to help reduce the impacts on the health of the local population, particularly school children. However, it is also recognised that the Stadium and Arena in particular will give rise to particular demand for fast-food close to these facilities. Policy must, therefore, seek to balance the needs of visitors to the area with the impacts that fast food restaurants can give rise to, including for example, increased levels of litter and noise as well as on the health of local people. Borough -wide policy (as currently set out in the UDP 2004, policies SH6 - SH8) limits the amount of frontage in the primary parts of town centres that can be occupied by non-retail uses. This will continue to apply in Wembley. However, there is a need for policy to further limit the level of A5 uses, particularly in secondary frontages where there are currently no limits.

WEM 28

Hot Food Takeaways (A5 Uses)

In recognition of the specialist role that the town centres in Wembley have in meeting the needs of visitors to the area, outside of primary and secondary frontages applications for new A5 uses will be considered on their merits.

There will be a limit of 7% on the proportion of units in A5 use in any single length of primary or secondary frontage of Wembley / Wembley Park town centres. No further A5 uses will be permitted within 400 metres of a school entrance/exit point.

Conferencing Facilities

8.21 Conferencing facilities have been scaled back locally following the loss of the Wembley Conference Centre and associated exhibition space. The council's vision for Wembley is that these uses be re-provided in the form of a Convention Centre. In the current climate there appears to be little appetite for the private sector to provide such a purpose-built facility. Nevertheless, Wembley, particularly because of the Stadium but also the Arena and hotels, remains an important conference venue. It may be possible, through collaboration between different providers such as the Stadium, Arena, hotels and the council,

1 United States Department of Agriculture's Nutrition Evidence Library

8 Town centres, shopping, leisure and tourism

to develop in partnership a form of "virtual conference centre" where major conferences or exhibitions can be held by making use of the various facilities that will be available in the area.

WEM 29

Conferencing Facilities

The development of new conferencing facilities within existing or new buildings is promoted in Wembley, either purpose-built or as part of major mixed-use development. Good access to public transport will be important in determining proposals.

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Temporary Creative Uses

8.22 The regeneration programme for Wembley reaches beyond 2026, and the impact of the recession has meant that the realisation of regeneration will be slower than anticipated. Meanwhile, there are a number of locations which could be exploited to create temporary creative uses at Wembley which could make use of what are likely to be long-term vacant or underused land and buildings, boost jobs, promote the cultural offer and increase the number of visitors to Wembley.

WEM 30

Temporary Creative Uses

The use of vacant sites or buildings will be promoted for occupation by temporary creative uses, especially creative industries that will benefit Wembley's retail, leisure, tourism and creative offer.



Picture 8.6 Performance art at Arena Square

Evidence Base - Town Centres

- Takeaways Toolkit (GLA, November 2012)
- Takeaways Evidence for Wembley Area Action Plan (LBB, August 2012)
- GLA Town Centre Health Check (GLA, December 2009)
- Brent Retail Needs and Capacity Study (Roger Tym, December 2008)

Social infrastructure 9

Strategic Policy

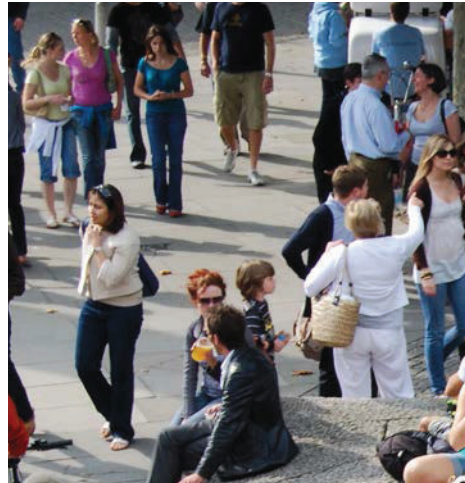
9.1 London Plan policy 3.16 recognises the need for additional and enhanced social infrastructure provision to meet the need of a growing and diverse population and suggests that boroughs should ensure that adequate social infrastructure provision is made to support new developments.

9.2 Policy 3.18 requires that boroughs should provide the framework for assessing education provision needs and to secure sites for future provision whilst policy 3.17 states that boroughs should work with the NHS, social care services and community organisations to regularly assess the need for health and social care facilities.

9.3 Policy CP7 of the Core Strategy anticipates need for the following infrastructure;

- 2 new 2-form entry primary schools
- Extensions to existing schools
- Nursery places
- Health facilities with space for 14 GPs and 11 new dentists
- New multi use community facilities

9.4 Policy CP15 states that before granting planning permission for major proposals, the council will have to be satisfied the infrastructure requirements arising from the scheme will be met by the time it is needed. Additionally policy CP23 protects existing new Community and Cultural Facilities and further states that new multi-functional community facilities should be provided at 370m² per 1000 population.



Policy Context

9.5 Social infrastructure such as schools, health centres, community facilities and leisure / recreation facilities ⁽²⁾ are essential in supporting sustainable communities. As new development leads to population growth, it is vitally important that supporting infrastructure is adequate. Existing

social infrastructure in Wembley is under pressure, particularly school provision, although this has been addressed in part recently by the opening of the new Ark Academy. Further school places will be needed as the population grows and the Infrastructure and Investment Framework (IIF) identifies the anticipated future level of demand.

9.6 In terms of health provision, the borough is well served by two large hospitals, but local treatment centres will be needed in Wembley as the population grows. Space for new health facilities can be secured in new development. However, fitting out and opening new health facilities will rely on the resources of the local health service.

9.7 Brent's diverse communities require a range of community, social and cultural facilities. There is a range of existing community space in Wembley including religious and non religious facilities. Some facilities successfully rent out community space to provide revenue for management and maintenance; however, others lack revenue funding and are in need of renovations. Dennis Jackson Centre and Wembley Youth Club have closed due to cuts in funding.

9.8 The Infrastructure and Investment Framework, prepared on behalf of the council to support the policies and proposals in the LDF, identifies specific infrastructure needs, including social infrastructure, for Wembley as well as the rest of the borough. This was updated in 2011 and

² see also the open space and sports chapter

9 Social infrastructure

the council is committed to further updates on a regular basis so that the necessary provision to meet needs arising from development are known.

9.9 S106 funding has made, and continues to make, a significant contribution to the infrastructure requirements of development in Wembley. Funding of infrastructure will shortly be replaced in the main by Community Infrastructure Levy (CIL) contributions from development in the area. A proportion of CIL collected (£35 per sq m) also contributes towards the Mayor's funding of Crossrail.

School Places

9.10 As there is an increase in local population with new housing development there will be a need for additional nursery and school places. Providing for additional primary school places needs to be addressed urgently. Currently there are 124 primary schools in the Wembley area, including Preston Manor High School which is due to open in September 2011. Population growth with housing development will need further primary school provision, which could be met by building new and/or expanding existing primary schools in the area. New secondary school places are also needed. However, pressure on existing secondary schools is currently less critical and as their catchment area is larger, these do not necessarily need to be located directly within the area of population growth. As new nursery and other day

care provision have limited space requirements, these can be accommodated relatively easily within the AAP area as and when demand grows. Likewise nursery facilities have small space requirements and could be combined with other new or expanded primary school facilities.

Health

9.11 Population growth from new housing development will need additional space for primary health facilities. The Core Strategy sets out that affordable floorspace to accommodate 1 new GP for every 1,500 people will be required from new housing development. In Wembley, the IIF estimates that space for 17 GPs and 12 dentists will be needed by 2019. In recent years the Primary Care Trust have developed expanded health facilities at Chalkhill and Monks Park Clinics, so there is not an immediate need for additional provision. Quintain built a 1469 sq m health facility as part of Quadrant House which is currently vacant. Strategic decision making within the health sector is at the present time going through a period of uncertainty as the government implements healthcare reform.



Picture 9.1 Monks Park health clinic

9.12 It is therefore proposed that these two health facilities should absorb the current population growth and thereafter new supply will be required in the Wembley Growth Area to pick up increased demand for new housing.

Community and Cultural Facilities

9.13 Wembley's diverse population should be supported by a range of community facilities including facilities for young people, cultural, community and religious use. While the council can only provide a limited amount of space directly to help meet these needs, new development provides an opportunity to improve and expand provision. The Core Strategy commits to providing multi-functional community facilities (excluding schools and health facilities) at a rate of 370m² per 1000 new population. Part of this will be met by the new Civic Centre which includes a 750m² community library. There are a number of existing community facilities in Wembley, some of these

Social infrastructure 9

lack sufficient funding or have recently closed. Funding derived from new development could provide investment for these existing facilities. Additional new community space will be needed as demand from a growing population increases and could be provided in a number of shapes and forms and through different mechanisms.

9.14 The scale of development within the Wembley Growth Area will require enhancements to neighbourhood policing facilities. In order to ensure that the Wembley area remains a safe and secure place for residents and visitors, it is important that the diverse nature of policing needs as a result of development and intensification can be met. The London Borough of Brent will, therefore, work alongside the Mayor's Office for Policing and Crime and Metropolitan Police Service to ensure the delivery of necessary policing facilities in Wembley so that the impact of new development upon policing can be mitigated.

9.15 The diversity of Wembley's population means there is additional pressure for places of worship to meet demand from different faiths. Faith groups can find it difficult to find sites for new or expanded places of worship which are affordable. As there is a lack of suitable sites or premises the faith groups are encouraged to make use of shared space.

9.16 One of the most pressing problems is affordability which often condemns community groups to poor quality facilities without the means to improve them. To address the problem of

affordability, the council in approving the North West lands application has secured a lower quantum of community space than expressed by the Core Strategy but at no rent. The council will be prepared therefore to reduce the overall quantity of community floor space requirements where this is reflected in substantially affordable rents. Most if not all council facilities will be multi-use community facilities for the whole community. The council will however support the provision of community and religious groups bringing forward its own community facilities provision in accessible locations.

WEM 31

Community Facilities

In considering the needs for Community Facilities provision the council will:

1. Secure at least four forms of entry at primary level to be secured on development sites within the Wembley area, noting provision of one site in site proposal W 18.
2. Secure contributions for secondary school provision through planning obligations and then through the use of the Community Infrastructure Levy.

3. Require new GP/dentists provision in the AAP where other local capacity (e.g. Chalkhill Health Centre) is used up in the longer term as population grows.

4. Seek the provision of multi-use community facilities at the rate set out in the Core Strategy accepting a lower provision when costs of provision or rents are substantially reduced;

5. Support the provision of community facilities social infrastructure including religious, community and cultural provision in locations accessible to all sections of the community and within easy reach by walking, cycling and public transport within the AAP area; and

6. Actively support the provision of meanwhile and temporary uses that will provide opportunities for social interaction.

Evidence Base - Social Infrastructure

- Brent Infrastructure and Investment Framework (LBB, October 2011)

10 Response to climate change

Strategic Policy

10.1 As the scientific understanding of climate change and its likely impacts become clearer since the Kyoto protocol was drawn up in 1997 to implement the United Nations Framework Convention for Climate Change, there have been various international, EU, national, London and local climate mitigation targets set to tackle climate change collectively. The NPPF acknowledges that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.

10.2 UK Climate Projections predict that summer average temperatures in London will, given a low emissions scenario, rise by 1.6°C over 30 years between 2010 and 2039, that summer rainfall will decrease by 7% in 2020 and that winter rainfall will increase by 6% in the same time period. The main climate change impacts on London will be overheating (urban heat island effect), water scarcity, increases in the frequency of flooding, severe weather events and more frequent heat waves. Increasingly it is acknowledged that a certain level of climate change is inevitable and development will need to be built to cope with a changing climate.

10.3 The London Plan sets out a comprehensive range of policies to underpin London's response to climate change. It concludes that the effects of

climate change could seriously harm Londoners' quality of life, particularly the health and social and economic welfare of vulnerable people. The Mayor's Climate Change Mitigation and Energy Strategy contains further proposals to reduce carbon dioxide emissions and to tackle climate change through decarbonising London's energy supply, reducing the energy consumption of London's existing building stock and moving towards zero emission transport in London.

10.4 Nearly all residential development will be within the Wembley Growth Area where major residential proposals are required to achieve a minimum rating of Code for Sustainable Homes Level 4 in line with policy CP19 of Brent Core Strategy. A rating of BREEAM "Excellent" is expected for major non-residential developments.

Policy Context

10.5 Wembley AAP covers a diverse mix of residential, industrial, shopping, leisure, entertainment, community and office land uses in fragmented land ownership, such that the area presents challenges when trying to achieve social, economic and environmental sustainability. There are mechanisms to reduce carbon emissions from new developments in Wembley through the London Plan, UDP and LDF planning policies, building regulations and other initiatives. The first step in reducing carbon emissions from development in Wembley is to ensure new development uses less energy in line with the Mayor's energy hierarchy to "be lean, be clean and be green."

10.6 Climate change will have a significant impact on the economic, social and environmental well being of Wembley. Hotter summers will have a bigger impact in Wembley because of the predominance of concrete and buildings. Heat waves will mean more people are likely to suffer from illnesses and could also lead to damage to roads, railways and buildings. Heavy thunderstorms and intense winter downpours will become more common, and will lead to flash flooding where the drainage system cannot cope with the increased rainfall. It is therefore crucial that future development in Wembley addresses these impacts and limits its contribution to climate change by minimising carbon emissions.

10.7 Specific issues for Wembley include the legacy of industrial use in the area which led to a lack of green and 'cool' spaces. Much of Wembley is deficient in open space and there are few mature trees. Land adjacent to the Wealdstone Brook is most at risk of flooding, although much of Wembley is also prone to surface water flooding. In addition, the majority of the sewer network in the Wembley area is undersized. The whole of the AAP area is an Air Quality Management Area (AQMA). Any proposals for new development will have to comply with London Plan policy 7.14: Improving Air Quality which seeks to minimise increased exposure to existing poor air quality and make provision to address local problems of air quality, particularly within AQMAs.

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Climate Change Mitigation

Decentralised Energy

10.8 Under policy 5.5 of the London Plan, the Mayor expects 25 per cent of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025.

Currently schemes coming forward are proposing site-wide combined heat and power (CHP) solutions, however greater efficiencies could be achieved if a wider Wembley network was established. This would need to overcome barriers of connecting different sites to one another and finding a site for a single energy centre. There is a significant financial risk in pursuing a single energy centre solution for Wembley and this would require substantial viability testing. It is considered more appropriate to ensure developments within Wembley are network ready by installing the appropriate infrastructure to connect to any future district energy network should it be forthcoming in the future.

WEM 32

Decentralised Energy

Major developments will be expected to connect to or contribute towards a decentralised energy system unless it can be demonstrated that such provision is not feasible or the proposed heating system is 100% renewable. Developments completed

prior to the implementation of the energy centre should be designed so that they can switch to the energy centre once it is available. Decentralised energy systems incorporating energy from waste will be supported.

Energy from Waste

10.9 The London Plan supports possible decentralised energy opportunities to utilise energy from waste. The EU Waste Framework Directive clearly ranks the 'waste hierarchy'. Prevention, which offers the best outcomes for the environment, is at the top of the priority order, followed by preparing for re-use, recycling, other recovery and disposal, in descending order of environmental preference. Brent will continue to support initiatives to reduce waste generated. CP19 of Brent Core Strategy requires major proposals to submit a Sustainability Statement that include the indication of reusing recycled aggregates and construction materials. Good progress is being made to recycle more in Brent; however, there is still some left over waste, known as 'residual waste', which cannot be recycled and is currently disposed of to landfill. Waste to energy (in the form of electricity and/or heat) or energy from waste conversion is an increasingly recognised approach to resolving two issues in one - waste management and sustainable energy. Facilities to recover energy from waste particularly if combined with heat recovery for a decentralised energy network to provide heat to residential, commercial and community units in

Wembley will make Wembley self-sufficient. There are a number of new and emerging technologies that are able to produce energy from waste without direct combustion. Any proposed technologies must not pose a threat to human health or the environment. A high standard design of the building and chimney stack must be achieved.

WEM 33

Energy from Waste

Major energy from waste facilities will be allowed only in the area east of Fourth Way. Environmental impact assessments and health impact assessments will be required to accompany the planning applications for such facilities which also have to deliver high quality design. Small scale proposals to recover energy from waste generated locally will be supported providing there will be no detrimental impact on human health and no increase in pollution emissions and greenhouse gases and the environmental impacts from vehicular movements are acceptable.

10 Response to climate change

Climate Change Adaptation

Greening Wembley

10.10 Brent Council seeks to increase the amount of surface area greened in the area and 1,000 new trees are expected to be planted by 2026. The roofs of existing buildings are mostly underused. Policy 5.10 of the London Plan encourages the use of planting, green roofs and walls and soft landscaping that can mitigate the effects of climate change, such as the urban heat island while bringing in health and social benefits. Green roofs also support sustainable urban drainage by absorbing rainfall to reduce flooding, enhance biodiversity, provide amenity space, provide opportunities to grow food and improve appearance. Encouraging green infrastructure through redevelopment will help to improve the ecological connectivity between sites for the benefit of local wildlife.

WEM 34

Urban Greening

Development proposals must incorporate urban greening measures such as green roofs, green walls, trees and soft landscaping. Wherever possible, opportunities to connect new green spaces to existing green spaces should be maximized to help create green infrastructure. Where site constraints limit the level of urban greening that can be provided

on site, a financial contribution will be required. Local food growing facilities will be supported as stated in (see policy WEM 38 in the Open Space chapter).



Picture 10.1 Living wall & planted balconies

Flooding

10.11 There are two main types of floods in the area, one is associated with the river when the actual amount of river flow is larger than the amount

that the channel can hold, and river will overflow its banks and flood the areas alongside the river. Land adjacent to the Wealdstone Brook is the area at risk of flooding. Map 10.1 shows the areas at risk of flooding. Brent seeks to ensure that all new development in flood risk areas is appropriately flood resilient and resistant and that any residual risk can be safely managed.

10.12 As required by the National Planning Framework, the council has undertaken a sequential approach should be used in areas known to be for sites at risk from any form of flooding including fluvial and surface water flooding. Planning recommendations are provided for sites at risk of flooding in the Site Proposals chapters. ~~Inappropriate~~ The council has a proactive approach to risk reduction when considering the suitability of sites for future development in the Wembley Area Action Plan, in line with the recommendations of the Strategic Flood Risk Assessment (SFRA). New development in areas at risk of flooding will be required to apply a site-level sequential test to ensure should be avoided by directing development is steered away from areas at highest risk and located in line with the NPPF flood risk vulnerability classification but where development is necessary, making it safe without increasing flood risk elsewhere.

10.13 In most of the urban area, roads and land are usually impermeable which can lead to surface water flooding. ~~Much of Wembley is prone to surface water flooding. The Flood and Water Management Act 2010 requires local authorities~~

Response to climate change 10

across England and Wales to develop, maintain, apply and monitor a [Brent's Surface Water Management Plan \(SWMP\)](#) provides a strategy for local flood risk management in [the borough](#). [their areas](#). Brent Surface Water Management Plan (BSWMP), which contains the Preliminary Flood Risk Assessment and a Flood Risk Management Plan. [The document identifies and designates a Critical Drainage Area \(CDA\) for the Wembley Stadium area which has several areas of surface water flooding affecting property and critical infrastructure. Three WAAP sites fall into a Local Flood Risk Zone \(LFRZ\).](#) aims to help manage and reduce surface water flood risk in Brent.

[W3-W4, W6-W20 and W25-W29. Specific SUDS requirements for sites in the LFRZ are set out in the appropriate Site Proposals.](#)



Picture 10.2 Sustainable urban drainage scheme

10.14 The Act also introduces the requirements for Developers [are required](#) to construct [include](#) sustainable urban drainage systems (SUDS) in their schemes. [The SWMP identifies specific SUDS measures for the Wembley Stadium CDA to relieve pressures on the drainage system, reduce flood risk and the demand for fresh water. These include](#) rainwater harvesting and grey water recycling, [can help relieve pressures on the drainage system, It can reduce flood risk and the demand for fresh water. SUDS such as green roofs, filter strips and swales, storm water storage tanks, permeable and porous pavements, re-profiling of ground levels, basins, ponds, reed beds can help reduce the volume and speed of water flowing into drains and eliminate surface water flooding. BSWMP favours the application of SUDS. Measures to alleviate surface water flooding through SUDS will be required as part of the development of sites](#)

10.15 ~~In addition,~~ Most of the sewer network in the Wembley area is undersized. Careful consideration must be given to issues of sewer flooding, both on and off site, as a result of new development. Developers may be required to carry out studies to ascertain whether proposed development will lead to overloading of the existing sewer infrastructure.

10.16 [Specific flood risk reduction measures and Flood Risk Assessment requirements are set out for each site proposal \(chapters 12-16\). This includes recommendations from the SFRA, SWMP and site-specific sequential considerations. From](#)

[2013 all new developments will be required to submit information to Brent's SUDS Approval Board \(SAB\) which has a duty to ensure that all new developments have incorporated SUDS to deal with the surface water run off from the development.](#)

WEM 35

Flood Risk

All proposed development in Flood Zones 2 and 3 will require a detailed Flood Risk Assessment (FRA), in accordance with Section 6.7 of Brent's Strategic Flood Risk Assessment.

Applications will be assessed against the site-specific flood risk mitigation requirements set out for individual Site Proposals.

Development is not suitable in Flood Zone 3b.

[Application of a site-level sequential approach will be expected to locate development towards areas of lowest risk within the site. More vulnerable development will not usually be appropriate in Flood Zone 3a. Where it is proposed in exceptional circumstances, an Exception Test will be required.](#)

Proposals within Flood Risk Zones 3a (High Probability and Climate Change) and 2 (Medium Probability) will be required to pass the Sequential Test, and where a site is affected by Flood Zone 3a, the Exception Test

10 Response to climate change

must be applied. Proposals will need to demonstrate how flood risk is reduced by sequential layout of the site and form of development. All proposals for development in Flood Zones 2 and 3a&b will require a full Flood Risk Assessment (FRA). Proposals in Flood Zone 1 which are over 1 hectare in size will also require a site specific FRA.

Development proposals in the area above must demonstrate that there will be no net loss in floodplain storage nor an increase in maximum flood levels, within adjoining properties as recommended by Brent's Strategic Flood Risk Assessment Report Level 2 (2007).

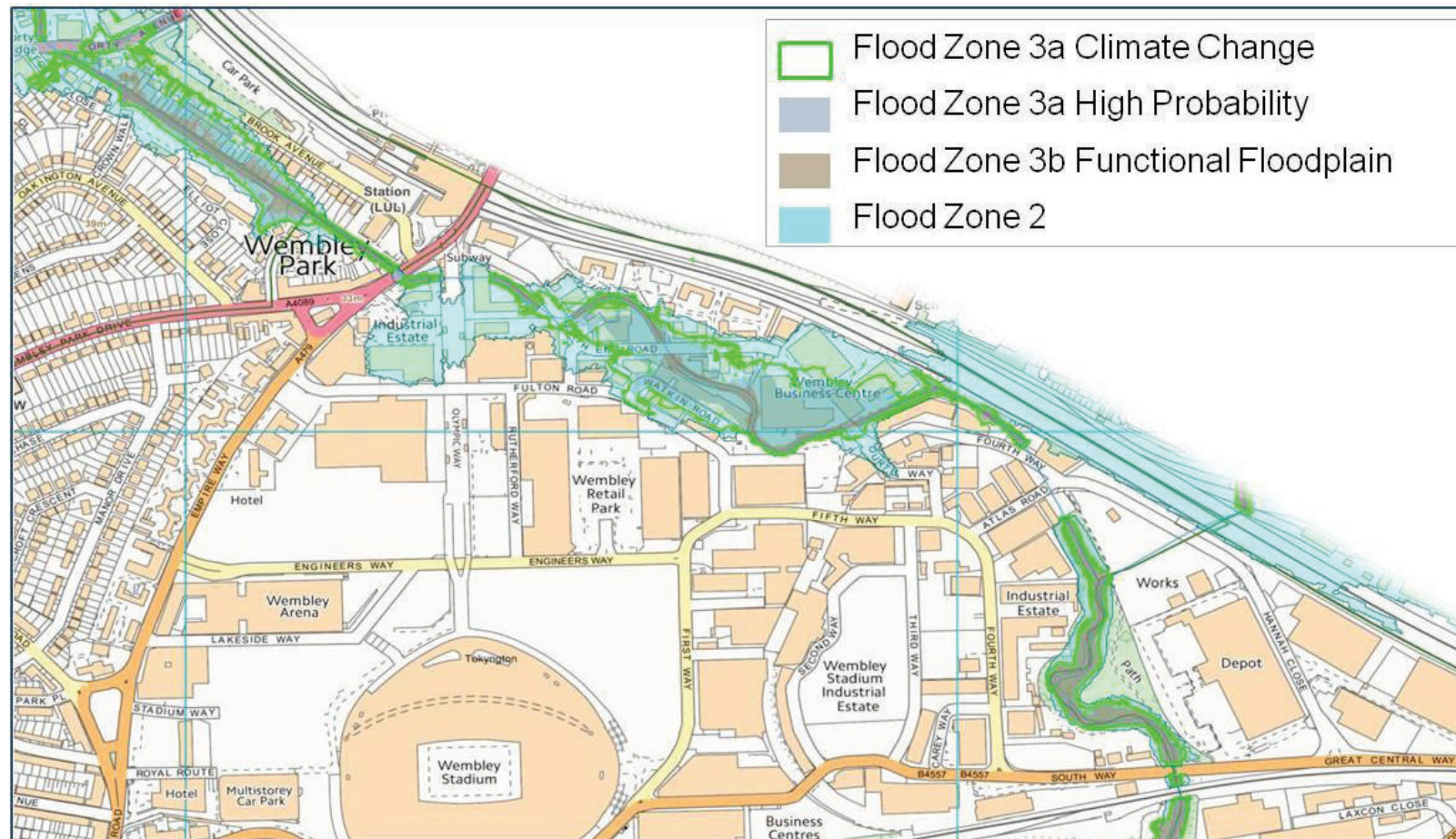
Developments will be required to implement SUDS to ensure that runoff from the site (post redevelopment) does not exceed Greenfield runoff rates. In order to reduce surface water flood risk in the area, all major proposals will be required to apply SUDS in accordance with Brent Surface Water Management Plan.

Developers will also be required to demonstrate whether there is sufficient capacity both on and off site in the foul sewer network to support development. Where insufficient capacity exists developers will be required to identify how any necessary upgrades will be delivered ahead of the occupation of development.

Evidence Base - Climate Change

- WAAP Flood Risk Analysis for Site Proposals (LBB, December 2012)
- Mayor's Climate Change Mitigation and Energy Strategy (GLA, October 2011)
- Brent Surface Water Management Plan (Hyder, October 2011)
- Brent Strategic Flood Risk Assessment (SRFA) Level 2: Wembley Masterplan (Jacobs, November 2008)
- Brent Sustainable Energy Infrastructure: Wembley Feasibility Study (Arup, September 2008)
- Brent Strategic Flood Risk Assessment (SRFA) Level 1 (Jacobs, December 2007)

Response to climate change 10



Map 10.1 Flood Zones in Wembley

11 Open space, sports and wildlife

Strategic Policy

11.1 There is a lack of open space in Wembley and access to existing open spaces is limited. Biodiversity and the natural environment can lead to opportunities, not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality of life. The strategic policies set out in the London Plan support the protection of local open space and require open space deficiencies to be addressed (policy 7.18). The River Brent forms part of the Blue Ribbon Network, London Plan policy 7.24 recognises the Blue Ribbon Network as an important series of linked spaces and policy 7.28 seeks the restoration and enhancement of rivers. Improving people's accessibility to nature and the protection of wildlife habitats is supported in London Plan policy 7.19, whilst policy 7.22 protects existing allotments and supports identification of spaces for community food growing and innovative approaches to providing space to grow food. Furthermore, access to good quality play and informal recreation provision for children and young people is supported in London Plan policy 3.6. Although Wembley Stadium is home to international and national football, Brent has one of the worst participation rates in England for sport and physical activity (Sport England's Active People Survey 2011-12 2005-6). London Plan policy 3.19 encourages the enhancement and increased provision of sports facilities.

11.2 Wembley's deficiency in open space and lack of participation in sports is reflected in the Brent Core Strategy objectives to protect and enhance Brent's environment and to promote sport and other recreational activities with new facilities in areas of deficiency, including at least one new pool. Policy CP18 Protection & Enhancement of Open Space, Sports & Biodiversity seeks new parks in Wembley and contributions from development will be sought towards sports facilities. The Core Strategy policy CP7 Wembley Growth Area identifies the need for a new park (1.2ha) and 3 pocket parks (0.4ha each), improve quality & accessibility of existing open spaces, a new community swimming pool, indoor & outdoor sports facilities, play areas and the planting of a minimum of 1,000 trees. The Core Strategy Wembley Growth Area Key Diagram shows existing open spaces and indicates the location of 4 new public open spaces and proposed pedestrian links to open space.

Policy Context

11.3 The majority of the Wembley area is more than 400m walking distance from either King Edward VII Park or Brent River Park and is therefore considered to be deficient in public open space. There are also few small public open spaces in the Wembley area. The nearby Sherren's Farm and Chalkhill open spaces are separated from the main regeneration area by the Metropolitan, Jubilee

and Chiltern railway lines. The nearest playgrounds at King Edward VII and Brent River Park are outside the area. The area south of the High Road and Harrow Road is a priority area for new play provision.

11.4 Sports facilities are available at King Edward VII Park (tennis, football and bowls) and the new sports hall, synthetic turf pitch, netball, basketball and tennis courts are located at Ark Academy school are available for community use. In addition, Power League 7 a-side and 5-a-side football pitches are situated next to Wembley Arena. The council is supportive of the provision of commercial owned sports and recreational facilities. Brent Planning for Sports and Active Recreation Facilities Strategy 2008-2010 identifies a significant lack of swimming pool provision in the borough and recommends a new pool is needed to serve central areas of the borough. Other sport facility improvements also sought in Wembley include:

- New and upgraded sports halls
- Pitch and changing facilities at King Edward VII Park and Chalkhill open space
- New multi use games areas (MUGAs) at King Edward VII Park, Sherren's Farm and Chalkhill Youth Centre
- Refurbished BMX track at Chalkhill

Open space, sports and wildlife 11



Map 11.1 Existing Open Spaces

11 Open space, sports and wildlife



Picture 11.1 King Edward VII Park

Open Space in Wembley



Picture 11.2 New park - artists impression

Page 25

The Wembley Masterplan identifies the future role of Olympic Way as the centrepiece to the open space network with good pedestrian links to the rest of the area. The provision of open space at Olympic Way would help meet the open space needs for the Wembley area.

11.6 There has been some progress towards the increase of open space in Wembley. In 2011, an outline planning permission which was granted to Quintain Estates and Development PLC at the former Palace of Arts & Palace of Industry Site included a new public open space of 0.4 hectares. The expected population growth within Wembley will require new public open space and sports provision. Anticipated facilities needs are set out in the Infrastructure and Investment Framework.

11.7 A new 1.2ha park will be the principal new open space in the Plan area. It is required to meet the needs of the increased resident and working population of the area. The expected population growth would normally require a 2ha public open space. However, it is recognised that this would be impractical to deliver. The Core Strategy therefore states that the new park should be at least 1.2ha in size. In addition to the new 1.2ha park, a series of well connected pocket parks are required to provide sufficient open space within a densely populated area.

WEM 36

Open Space Provision

The council will require a new park in Wembley to be at least 1.2 ha in size, located adjacent to Engineers Way, orientated East to West. The new park will provide for a range of sporting activities and play facilities. It should create pedestrian links/strong physical connections between the eastern and northern districts, linking with Olympic Way and other major spaces. A further three pocket parks of 0.4ha each will be sought in the Wembley area.

Development proposals which fall within an area of open space deficiency will be expected to provide new open space in line with the requirements set out in the council's Infrastructure and Investment Framework document.

11.8 The Infrastructure and Investment Framework document sets out infrastructure requirements principally in the borough's housing growth areas and some of its key regeneration areas, specifying open space provision required to support new housing growth.

Open space, sports and wildlife 11

Open Space Improvements

11.9 The need to enhance and improve public open space in Wembley is established in the Core Strategy. Open space improvements will also have wider health and well-being benefits providing opportunities for active and informal recreation. Chalkhill Park, is a new park where community consultation played a key role in the design of the development and is currently under construction. This area was previously used as a health centre and car park. As part of the redevelopment of these temporary facilities, a community park was required under a Section 106 Agreement. The new public open space will provide amenity green space, formal recreational areas, play area, a sculpture area, along with habitat creation and enhancement of the wildlife corridor.



Picture 11.3 Green Flag award

11.10 There are a number of options for achieving this including creating new public open space and improving access to existing open spaces ([shown on Map 11.2](#)). Any improvements will require [consultation with key stakeholders](#), initial investment and ongoing maintenance and management. Development contributions towards open space improvements will be included in appropriate site allocations.

WEM 37

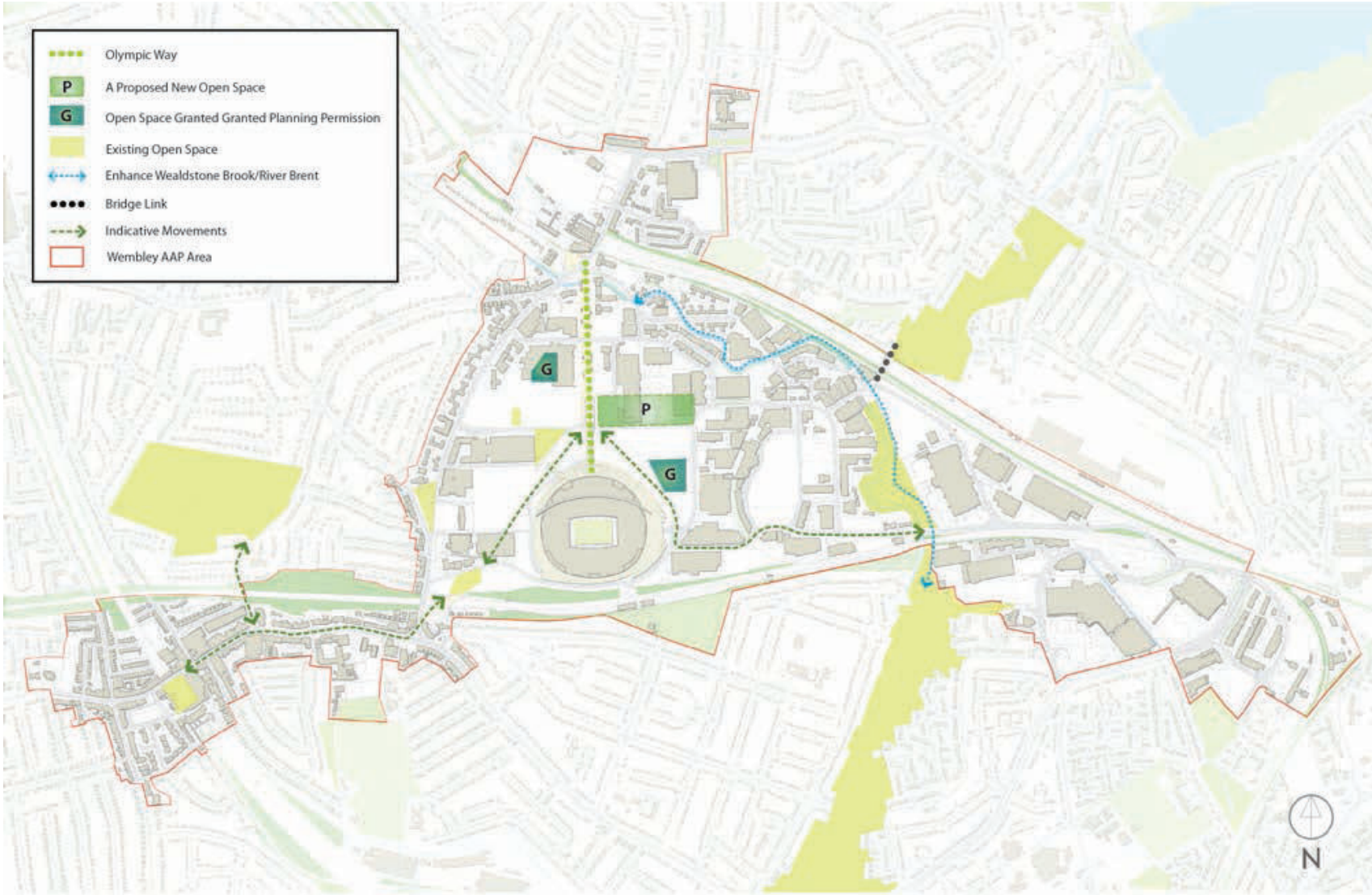
Open Space Improvements

The council will support the enhancement and improvements of open space in the Wembley area including:

- Creation of public access to Copland playing fields
- Creation of a new woodland walk along Chiltern Embankments
- Semi-naturalisation of the Wealdstone Brook and the creation of a linear open space for informal recreation
- A new pedestrian bridge across the Metropolitan, Jubilee and Chiltern railway lines to link to Chalkhill Open Space at St David's Close

Where appropriate, contributions from development proposals will be sought towards local open space improvements.

11 Open space, sports and wildlife



Map 11.2 New Public Open Space Links

Open space, sports and wildlife 11

Food Growing

11.11 Local food growing supports healthy living and has environmental and community benefits. In the Wembley area, there are public allotments available at Cecil Avenue, Lyon Park Avenue, Bovington Avenue and a small number of private allotments at Vivian Avenue. However, these allotments have long waiting lists, are not located within the Wembley AAP boundary and so consequently are not easily accessible to much of the area. Limited development is promoted at Vivian Avenue to enable improvements to the allotments and existing tennis courts and club house (SSA25 of the Site Specific Allocations DPD). The Brent Open Space Report – PPG17 Assessment identifies a local standard of 1 new allotment plot per 200 new residents. The report recognises the constraints in providing new allotment plots and promotes allotment gardens in new housing developments that can be placed on flat roof spaces where large beds can provide for food growing and recreational use.

for food growing will be encouraged. The council will seek contributions from development at Vivian Avenue to enable allotment expansion.



Picture 11.4 Example of food growing

Sports Facilities

11.12 The council has secured a new community swimming pool and health and fitness centre as part of the redevelopment of Dexion House, Empire Way. The council's Sports department is implementing the priorities of the Facilities Strategy and has recently laid out football pitches at King Edward VII park and installed a new MUGA. Other sports facilities will be needed and these could be

delivered in a number of ways including council capital investment, access to school facilities and funding from development.



WEM 39

Sports Facilities

The council will seek contributions from development and use these to improve the provision of sports facilities in Wembley and will work in partnership with schools to make new or upgraded sports facilities available for the local community use out of school hours, e.g. Copland Community School.

WEM 38

Food Growing

The council will promote local food growing by encouraging major new residential development, to include space for residents to grow their own food and/or for the establishment of gardens for community food growing. The use of vacant spaces temporarily

11 Open space, sports and wildlife

Play Provision

11.13 As with other forms of open space, there is a shortage of play provision in Wembley. The only existing equipped play areas are at King Edward VII and Brent River parks. However, there are other opportunities for informal play such as the water fountains at Arena square. New development will increase demand for play facilities. In line with the Mayor of London Providing for Children and Young People's Play and Informal Recreation SPG (2008), the Infrastructure and Investment Framework identifies the need for 5 new neighbourhood play areas by 2026. It highlights the importance of links to open space and play areas critical in an area of high density in the absence of certainty regarding open space provision. It will be further supplemented by formal play provision in public open space.

WEM 40

Play Provision

The council will require new, major housing development to provide children's play space according to the following standards:

- A minimum of 10m² per child (5-17 years) of 'neighbourhood playable space'.
- A minimum of 10m² per child (0-5 years) of 'doorstep playable space'.

11.14 The standards required in the Play Provision policy are in line with the Mayor of London's Providing for Children and Young People's Play and Informal Recreation SPG (2008) and set out in the Wembley Masterplan. With the expected density level, a minimum of 10m² per child (5-17 years) of 'neighbourhood playable space', could be partly accommodated within the three district open spaces of at least 0.4 hectares. However, the provision of 'doorstep playable space' should be an integral part of development proposals.

Access to Nature

11.15 There are limited areas of nature conservation value in Wembley, reflecting its built up urban character. The main areas of habitat are the Chiltern line embankments, Wealdstone Brook and Brent River Park. There are also smaller wildlife pockets at St John's churchyard, Oakington Manor Primary School, Copland Community School, Ark Academy and the Metropolitan Line embankment. Much of Wembley is considered to be When improving areas for wildlife, a careful balance should be struck between ensuring separate undisturbed habitat zones and areas that people can enjoy and relax in.



Picture 11.5 Example of a green roof

WEM 41

Access to Nature

The council will seek public access on the northern side of the Chiltern railway line embankments to enhance the nature conservation value. Naturalisation of the River Brent and the Wealdstone Brook will also improve access to nature (see Policy WEM 42 River Brent and Wealdstone Brook). Where appropriate, the council will require new development proposals to include wildlife enhancements, e.g., green roofs, living walls, tree planting, landscaping, bat and bird boxes.

Open space, sports and wildlife 11

11.16 Detailed requirements for providing or improving public access to nature conservation is set out in the site proposal W 3 Chiltern Line Cutting North in the Wembley High Road chapter and site proposals; W 25 Amex House, W 26 Watkin Road and W 27 Euro Car Parts in the Wembley Eastern Lands chapter.

The River Brent and Wealdstone Brook

11.17 The River Brent and the Wealdstone Brook natural open spaces have an important role in providing open space provision, increasing biodiversity and reducing flood risk. They provide a natural landscape in an urban setting and offer a different type of open space in Wembley. The enhancement and improvement of these natural open spaces will contribute towards combating the deficiency in the provision of open space in Wembley.

11.18 The River Brent is a Site of Borough Nature Conservation Importance Grade I and the Wealdstone Brook is a Site of Borough Nature Conservation Importance Grade II. The River Brent open space is poorly connected to the surrounding area and is under used. Opportunities to improve links and naturalise the River Brent will be considered through the development management process. The Brent Feeder, which is partly culverted underground, is owned and managed by landowners across the AAP area. It is essential that the Feeder is maintained appropriately. Historically the Wealdstone Brook has been canalised and culverted along its length to make

way for development. Future regeneration should use the opportunity to restore the natural river corridor by partial naturalisation.

11.19 The Wealdstone Brook is a Site of Borough Nature Conservation Importance Grade II. Historically the Wealdstone Brook has been canalised and culverted along its length to make way for development. The Wealdstone Brook Restoration Study contains proposals for the improvements and restoration of the Wealdstone Brook. The proposals include the partial naturalisation of the Wealdstone Brook, tree planting to identify its location, a brook side walk, and ecological improvements. These proposals are accompanied by an indicative costing for each one put forward. Future regeneration should use the opportunity to restore the natural river corridor by partial naturalisation.

11.20 Improvements to the River Brent and the Wealdstone Brook would help meet the requirements of the Thames River Basin Management Plan and the need to improve water quality. Under the Water Framework Directive (WFD), rivers and river bodies are assessed on their water quality. The assessment classified the River Brent as having a poor ecological status and the Wealdstone Brook as having a moderate status. The WFD has set the objective for these to achieve a good status or good potential by 2027.

11.21 The London Rivers Action Plan includes restoration projects for the Wealdstone Brook and River Brent. Two of these projects are within

Wembley and any improvements to the rivers should be in line with this plan and the Brent River Valley chapter of Natural England's publication London's Natural Signatures.

WEM 42

River Brent and Wealdstone Brook

The council will work in partnership with the Environment Agency and use development contributions to aid the restoration of the River Brent and the Wealdstone Brook. The development of sites adjacent to the Wealdstone Brook should undertake the opportunities to provide amenity space, improve biodiversity, public access, and semi naturalisation. Development proposals adjacent to the River Brent and Wealdstone Brook should contribute to the naturalisation of the river ~~have regards to its natural setting~~ and enhance biodiversity.

11.22 The flood risk policy in the Climate Change chapter should be referred to in conjunction with this policy. In addition the detailed requirements of sites located in close proximity to the Wealdstone Brook are set out in site proposal W 21: 21- 31 Brook Avenue in the Wembley Park/Empire Way Corridor chapter and site proposals: W 25 Amex House, W 26 Watkin Road and W 27 Euro Car Parts in the Wembley Eastern Lands chapter.

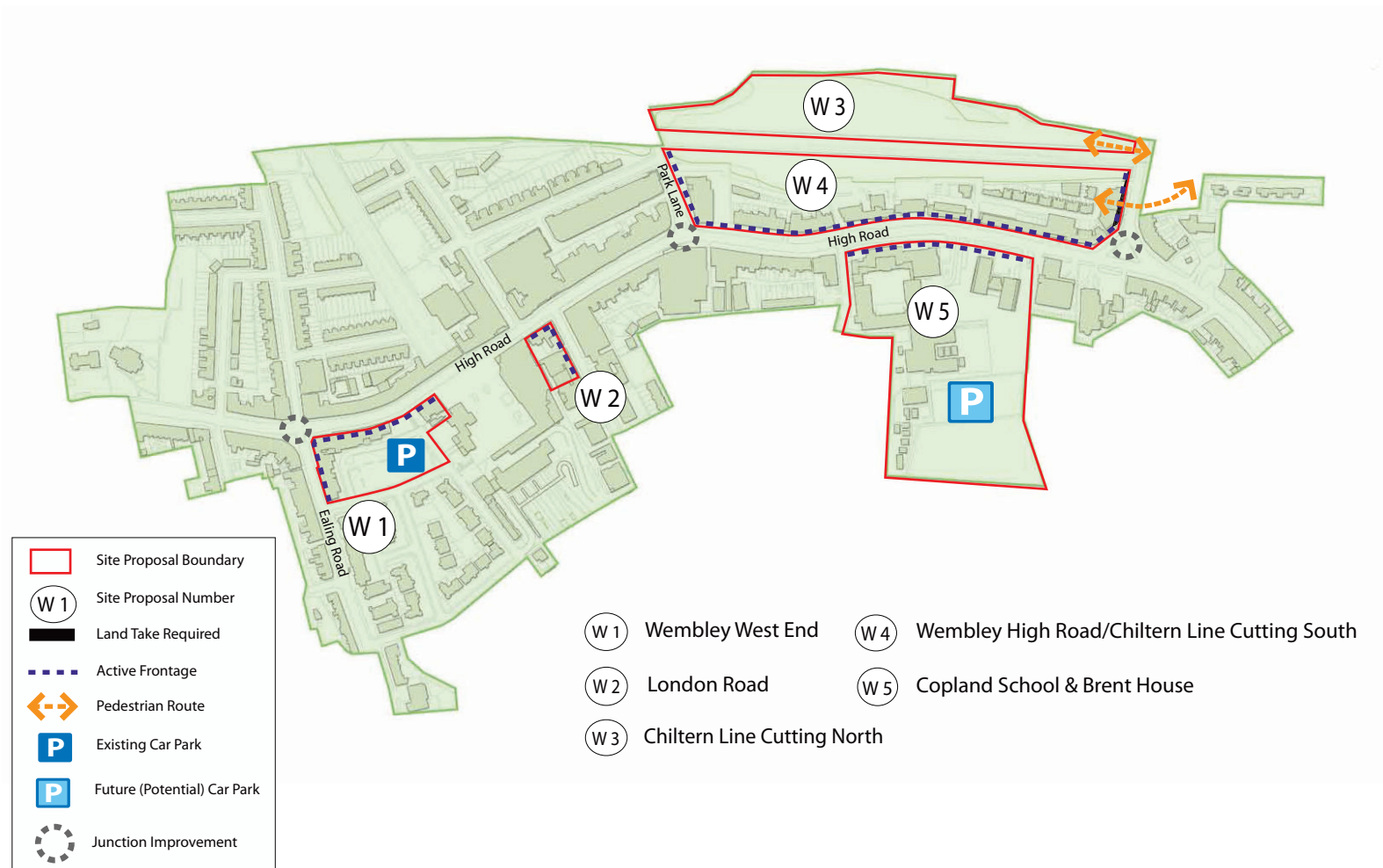
11 Open space, sports and wildlife

11.23 The London Rivers Action Plan includes restoration projects for the Wealdstone Brook and River Brent. Two of these projects are within Wembley and any improvements to the rivers should be in line with this plan and the Brent River Valley chapter of Natural England's publication London's Natural Signatures.

Evidence Base - Open Space

- Active People Survey (Sport England, December 2011)
- Infrastructure and Investment Framework (LBB, October 2011)
- London's Natural Signatures (Natural England, January 2011)
- Thames River Basin Management Plan (Environment Agency, December 2009)
- Brent Open Space Report: PPG17 Assessment (LBB, 2009)
- Wembley Masterplan (LBB, June 2009)
- London Rivers Action Plan (Rivers Restoration Centre, January 2009)
- Brent Planning for Sports and Active Recreation Facilities Strategy 2008-2010 (LBB, 2008)

Wembley High Road: Site Proposals



Map 12.1 Wembley High road

12 Wembley High Road

12.1 Wembley High Road forms a vital connection between the new Wembley Masterplan areas and Wembley town centre. At the same time as the development within the Masterplan area builds out, the High Road link will be developed in a way which provides an improved public realm and pedestrian environment, and reducing the effects of through traffic. By doing this, pedestrian movement will be facilitated between the stadium area and attractions within the existing town centre, thereby retaining the vitality and viability of the town centre. The route needs to accommodate a number of different movements along its length, including movement of spectators for Wembley events between Wembley Central and Wembley Stadium.

12.2 To support these objectives, the eastern section will be developed for street cafés and restaurants, and high quality retail and leisure facilities, with more local retail and local attractions being offered along the western stretch. Preference will be given to development which supports the objectives of maintaining vitality and developing a vibrant town centre, as they will benefit from the good quality public transport access and space for people afforded by the improvements to public realm.

Wembley West End

Context

12.3 The western end of Wembley town centre is not subject to the same development pressures as the masterplan area, but is a designated

Opportunity Area, and is seen to be key to the continued improvement of the town centre. Due to the complexity of the site, the change in levels between the High Road and Montrose Crescent (up to two storeys) and the multiplicity of ownership, a series of development schemes have not been progressed, resulting in steady decline over a number of years.

12.4 Wembley West End site has a Supplementary Planning Document to support development on the site at the junction of Wembley High Road and Ealing Road. Although the site is not the only potential for regeneration, it is the next major potential development site within the town centre.

12.5 The council considers this area to be suitable for a mixed use redevelopment scheme, incorporating new residential and retail uses. This will develop the site as a key gateway to the town centre and create sufficient development to stimulate the regeneration of the west end of Wembley High Road, complementing the development of Central Square.

Planning History

12.6 No relevant planning history exists for this site.

Site W 1

Wembley West End

(0.8 hectares)

This site is suitable for comprehensive mixed use development including retail or other town centre uses and residential. A replacement town centre car park and amenity/open space should be provided. The development should improve and diversify Wembley's retail offer and include active frontages to Wembley High Road and Ealing Road.

Land for a bus lane and an improved footway is required along Wembley High Road to provide better pedestrian access along the High Road to Wembley Central Station. Provision for pedestrian access between the High Road and Ealing Road should either be provided along the alignment of the High Road or Ealing Road, or be incorporated within the ground floor design for any new development on this site. The provision of improved highway access by providing easier turning movement left from High Road into Ealing Road should be built into the development design, and potential use of the land behind the development to provide increased capacity at the Montrose Crescent car park, serving the western gateway to the town centre.

Indicative Development Capacity - 250 units

Wembley High Road 12

Justification

12.7 The site is identified within the adopted Wembley West End Supplementary Planning Document 2006. The council's 2006 retail capacity study concluded that Wembley Town Centre is suffering decline and identified this site as a retail opportunity. In line with national and regional policy, the site proposal promotes the mixed use redevelopment of a brownfield site for uses that are suitable for a town centre location. This is an opportunity to establish a regenerative anchor at the western end of Wembley town centre.

12.8 The Ealing Road section has been included to encourage a comprehensive approach to development. The transport and mobility elements of the allocation are a critical element of providing a western gateway into the town. Better pedestrian access between Ealing Road onto High Road and up to Wembley Central will help cater for the large volume of pedestrian movements in this area, and connects into the pedestrian route onward to Wembley Stadium. Providing this, in combination with improved highway accessibility, and potential improved parking to cater for demand at this western end of the town, will help enhance the effectiveness of public realm enhancements within the town centre.

London Road**Context**

12.9 The northern part of this site is situated on the High Road and consists of a 3 storey building which contains five ground floor units made up of retail, financial/professional services, take away and restaurant uses. There is some office space available on the first floor and residential use on the second floor. Adjacent to this building is a mixed use development forming part of Wembley Central square. The eastern side of the site is located along London Road and there are eight single storey units making up Sevenex Parade. They are used for a mixture of retail, financial/professional services, take away, cafe and restaurant uses.

Planning History

12.10 There is no relevant planning history for this site.

Site W 2**London Road**

(0.19 hectares)

Mixed use development. Appropriate uses include retail and other town centre uses on the ground floor and residential uses above. There should be active frontages to both the High Road and London Road.

Indicative Development Capacity - 50 units

Justification

12.11 This site is currently underused and could accommodate higher density development. The site is suitable for housing as well as town centre uses because it is located in a town centre close to a predominantly residential area and in an area of very good public transport accessibility. The provision of housing on this site will support the council's growth policy.

Chiltern Line Cutting North**Context**

12.12 The site comprises steep railway embankments to the north of the Chiltern Line tracks. It is adjacent to existing dwellings along Mostyn Avenue. Much of the embankment is covered by vegetation, including woodland, and is identified as a Site of Importance for Nature Conservation as well as a Wildlife Corridor in Brent's UDP 2004. Consequently, the site can support only a very limited amount of new development.

12.13 More detailed planning guidance for the site is contained within the Wembley Link SPD adopted in July 2011

12 Wembley High Road

Planning History

12.14 There is no relevant planning history for the site.

Site W 3

Chiltern Line Cutting North

(2.3 hectares)

This area would support only a very limited amount of new housing development. The scale of any new development should relate to, and respect the adjacent existing neighbourhoods to the north of this area. The Council will seek to maintain and enhance the nature conservation value of the site and mitigation and compensation measures will need to be provided to ensure that there is no overall net loss to biodiversity value and a continuous wildlife link is provided through the site. Public access through part of the site will be sought on development.

Site W3 is in a Local Flood Risk Zone (LFRZ) in the Wembley Stadium Critical Drainage Area (CDA) which has several areas of surface water flooding affecting property and critical infrastructure. Brent's Surface Water Management Plan (SWMP) identifies mitigation measures for the LFRZ which include road side rain gardens, detention basins and re-profiling ground levels.

Measures to alleviate surface water flooding will be required as part of the development of this site.

Indicative Development Capacity - 15 units

Justification

12.15 As the whole of the cutting on the north side is identified as an Area of Nature Conservation Importance as well as a Wildlife corridor, then significant development would be appropriate only if there were substantial benefits in terms of the regeneration of the town centre as well as major compensatory provision for the loss of habitat. The existing residential areas to the north are predominantly two storey which limits also the scale of development that would be appropriate. Consequently, only a limited development can be accommodated.

High Road/Chiltern Line Cutting South

Context

12.16 This site covers the section of land set alongside the north side of Wembley High Road currently occupied by small office blocks (some vacant) and small retail units, as well as the southern portion of the Wembley Chiltern Embankments site, behind the existing office and retail units along the High Road. The cutting is

designated as a Site of Nature Conservation Importance in Brent's UDP 2004, and development at the site needs to take account of this.

12.17 More detailed planning guidance for the site is contained within the Wembley Link SPD adopted in July 2011.

Planning History

12.18 For the Chesterfield House site, planning permission renewal (LPA ref: 06/1864) was given in February 2008, for demolition of the existing building and erection of part 11-storey and part 17-storey building, comprising retail/restaurant use on ground and first floors fronting the High Road and Park Lane, and remaining accommodation as Class B1 offices, with basement parking for 28 cars.

Site W 4

High Road / Chiltern Line Cutting South

(4 hectares)

A key aspect of the development of the High Road area is maintaining viability and vitality of Wembley town centre. Development should support these objectives and will need to be in keeping with providing improved public realm and pedestrian access through this area.

Wembley High Road 12

Development should also support the objective of creating a link to encourage movement to and from the new Wembley re-development via the White Horse Bridge and the forthcoming Wembley City Boulevard.

The council's objective is to transform the Wembley Link area into a sustainable mixed use community. This would be best delivered through developing the concept for cafés, restaurants and bars and appropriate retail along the frontage, potentially with office above these, and residential above this, where appropriate. Student accommodation or hotel would also be appropriate within this site. Development proposals should include active frontages.

Land will be required at Wembley Triangle for road widening on redevelopment of the site, as shown on the Proposals Map. In the longer term, if there was comprehensive re-development on this site, the council would seek to acquire this small portion of land to facilitate additional junction improvements beyond those already identified for Wembley Triangle as part of existing permissions.

Part of Site W4 is in a Local Flood Risk Zone (LFRZ) in the Wembley Stadium Critical Drainage Area (CDA) which has several areas of surface water flooding affecting property and critical infrastructure. Brent's Surface Water Management Plan (SWMP) identifies mitigation measures for the LFRZ which

include road side rain gardens, detention basins and re-profiling ground levels. Measures to alleviate surface water flooding will be required as part of the development of this site.

Indicative Development Capacity - 890 units

Justification

12.19 The existing units are located within a prime position between the emerging Wembley City and the existing town centre. They currently present, however, a disparate environment and a low quality townscape. A high quality redevelopment, having regard for other local proposals, will contribute to the regeneration of Wembley at a prominent site within the town centre. New retail activity and vitality will help to secure the regeneration of the existing town centre in the light of activity around the Wembley Stadium. New affordable offices can provide local employment and enterprise opportunities. The site benefits from excellent public transport accessibility with a selection of rail and bus services within walking distance

12.20 Development along the Wembley Chiltern Embankments needs to have careful regard to existing dwellings. It should be subject to an assessment of the nature conservation value of the embankments and include mitigation measures for its loss, including public access and a green link through the site.

Copland School and Brent House

Context

12.21 The site comprises Copland School, including a small northern part of the playing fields, together with the adjacent Brent House office building and car park.

12.22 More detailed planning guidance for the site is contained within the Wembley Link SPD adopted in July 2011.

Planning History

12.23 Outline planning consent (LPA ref: 02/2699) for

Site W 5

Copland School and Brent House

(4 hectares)

Mixed use development on the High Road frontage with new / rebuilt school to the rear.

The ground floor on the High Road frontage should be commercial retail development, potentially including a medium sized food store (approximately 6000m²) with associated car parking. Residential development either above or adjacent to the retail should include a high proportion of family housing.

12 Wembley High Road

Development of the school to the rear of the site should accommodate, if possible, an additional form of entry on current capacity.

The scale of new development near to Cecil Avenue should respect the adjacent suburban character.

Car parking on the retail site should have shared use for town centre parking. There should be an active retail frontage with servicing off Wembley High Road. Access from Cecil Avenue will be limited to residential access only.

In the event of the school not coming forward as part of a joint scheme, proposals may be brought forward for the Brent House site as a standalone development.

Indicative Development Capacity - 370 units

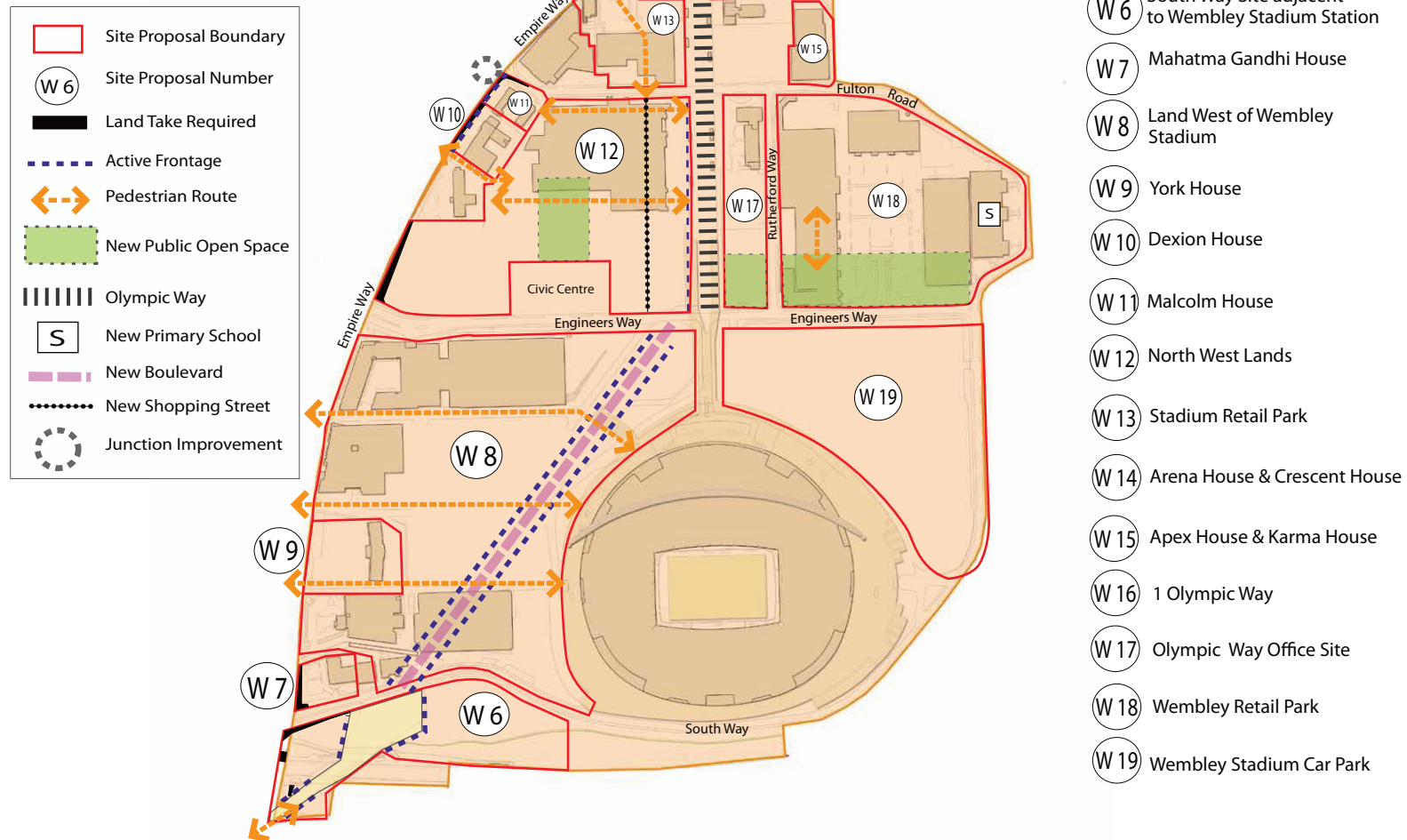
as residential. A large foodstore with parking for the town centre is the favoured option for the Brent House site.

Justification

12.24 Copland Community School buildings are badly in need of renewal and, consequently, are best re-provided at the rear of the existing buildings. This provides an opportunity to regenerate with an active frontage on the High Road helping to link the existing town centre with the regeneration area into the east. Brent House is also to be vacated by the council in 2013. This creates an opportunity for a comprehensive development of both sites to include uses appropriate to a town centre location as well

Comprehensive Development Area 13

Comprehensive Development Area: Site Proposals



Map 13.1 Comprehensive Development Area: Site Proposals

13 Comprehensive Development Area

13.1 This section deals with sites within the main regeneration area around the Stadium west of the industrial estate and east of Empire Way/Wembley Hill Road/Wembley Park Drive. It comprises of about 40 hectares of land and buildings and most of the new development in Wembley is focused here and a number of sites are already built-out, under construction or have planning consent. The Stadium itself, including its operation particularly on event days, has a major influence on how nearby sites can be developed. All of these sites are within the Wembley Growth Area. The sites within this comprehensive development area have been further divided up into distinct districts.

LAND AROUND WEMBLEY STADIUM STATION/HIGH ROAD LINK

Context

13.2 These sites present one of the more challenging issues relating to the regeneration and development of Wembley - how to effectively link the High Road and Town Centre to the Stadium and surrounding development sites. This link is vital to ensure that event day pedestrian traffic can be properly accommodated at both Wembley Central and Wembley Stadium stations and to properly integrate new town centre development to the east with the High road. All the sites are within the defined town centre and the Wembley Growth Area. Many of the sites are in the Strategic Cultural Area in which major leisure, cultural and tourism uses are encouraged.

13.3 The Land Around Wembley Stadium Station site includes a number of potential development areas which are under different ownerships. This, together with the irregular shapes of some of the development sites constrains potential development.

13.4 There is potential to re-align South Way to enable a larger development parcel including both the LDA Land and Mahatma Gandhi House.

13.5 A key requirement for the site is to ensure that it forms one of the gateways to the new development and stadium while integrating it with the existing town centre and high road.

13.6 As developments progress in the immediate and wider area, road junctions adjacent to this site are likely to come under pressure. Therefore, it will be necessary to identify and safeguard suitable land to widen the road at the bridge and improve the junction layouts at Wembley Triangle and between South Way and Wembley Hill Road.

South Way Site adjacent to Wembley Stadium Station

Planning History

13.7 Outline planning permission (LPA ref: 04/0379) granted in 2004 for mixed-use redevelopment to include:

- Business and employment uses: up to 21,747sqm
- Retail and Food and Drink: up to 7,475sqm

- Residential apartments: up to 43,160sqm (up to 495 units)
- Community cultural and leisure facilities: up to 12,961sqm

13.8 The proposal also included new station facilities at Wembley Stadium Station including a new bridge and platform access, and a new public square.

13.9 Phase 1 of the work, which provided a new town square and a new pedestrian bridge link, "The White Horse Bridge", over Wembley Stadium Station with new stairs and lifts to platforms, was completed in 2006. The rest of the site remains cleared and vacant.

13.10 Alternative proposals to that detailed above will be considered equally acceptable by the council providing that they are in accordance with the site proposal below and with other policies in the Plan.

Site W 6

South Way Site adjacent to Wembley Stadium Station

(1.29 hectares)

The location of this site means that it is ideally suited for major mixed use development, with a limited scale of development on the south side of White Horse Bridge. A retail component will be important in providing a link between the High Road and Wembley Park

Comprehensive Development Area 13

Boulevard. Pubs, bars or cafés would also be appropriate along with other town centre uses such as residential and student accommodation. Residential uses would be best suited to areas away from the main pedestrian thoroughfare while an employment hub would be encouraged for the land to the east of the square. Consideration would need to be given to access arrangements to this part of the site on event days due to the need for the public square to act as a holding area for passengers boarding rail services from Wembley Stadium railway station.

Active frontage should be provided at ground floor level on both the public square and the pedestrian link between The Triangle and Wembley Stadium. Car park access to the site should not conflict with pedestrian movements and the closure of South Way on event days.

New station facilities, including ticket office, should be provided together with an improved bus interchange

The height of buildings should not block the view of the stadium from Wembley Triangle with a 6-7storeys maximum height on the south side of site.

Land is required for bridge/road widening and junction improvement as shown on the Proposals Map and in Appendix C.

Site W6 is in a Local Flood Risk Zone (LFRZ) in the Wembley Stadium Critical Drainage Area (CDA) which has several areas of surface water flooding affecting property and critical infrastructure. Brent's Surface Water Management Plan (SWMP) identifies mitigation measures for the LFRZ which include road side rain gardens, detention basins and re-profiling ground levels. Measures to alleviate surface water flooding will be required as part of the development of this site.

Indicative Development Capacity - 341 units

Mahatma Gandhi House

Context

13.11 Mahatma Gandhi House is an office building on the north side of the junction of South Way and Wembley Hill Road which is to be vacated by the council early in 2013. It is to be available for re-occupation, conversion or redevelopment.

Planning History

13.12 No recent, relevant planning history.

Site W 7

Mahatma Gandhi House

(0.29 hectares)

Suitable for redevelopment or conversion for residential or office use. Any redevelopment should include an active ground floor onto South Way.

This site is adjacent to the Ibis Hotel therefore a building of a similar scale is appropriate.

Land is required to improve South Way/Wembley Hill Road junction, as shown on the Proposals Map, and Appendix C.

Indicative Development Capacity - 76 units (if residential)

Justification

13.13 The land around Wembley Stadium station is well served by public transport and provides a vital link and opportunity for development along the High Road and around the Stadium. It is therefore suitable for mixed-use development with a retail component to provide a link between the High Road and Wembley Park Boulevard retail areas.

13.14 Most of the land is vacant and White Horse Bridge provides a new high quality pedestrian link over the railway alongside a new public space.

13 Comprehensive Development Area

13.15 Mahatma Ghandi house provides an opportunity for conversion or redevelopment. There has been little demand for offices therefore alternative use is considered appropriate.

Land West of Wembley Stadium

Context

13.16 Quintain Estate and Development's Wembley City Scheme, which covers the largest part of this area, is currently being built out. It is creating a number of new employment and leisure opportunities and helping to create a year-round destination in the heart of Wembley. Forum House and Quadrant Court on Empire Way, providing housing as part of mixed use schemes, were completed in 2008 and 2010 respectively whilst a new student block and a Hilton Hotel were completed in summer 2012. Currently under construction is a further phase which will provide a major new designer outlet shopping centre and new leisure complex including a multi-screen cinema, due to open in 2013. Prior to this the Arena was completely refurbished and re-orientated to face onto a new Arena Square at the northern end of a new pedestrian boulevard. It hosted its first concert in April 2006.

Planning History

13.17 In 2004 the London Borough of Brent granted outline planning permission (LPA ref: 03/3200) for a major mixed-use regeneration scheme covering 42 acres of land surrounding the

new Wembley Stadium. The permission covered land to the west and east of the stadium; this site deals only with the area west of the Stadium.

Site W 8

Land West of Wembley Stadium

(8.4 hectares)

A key component of this area is the Boulevard connection which runs from the north east to the south west through the development site. This is critical in ensuring a connection to, and therefore integration with, the High Road as well as to Wembley Park to the north. The Boulevard connection should enable the use of buses, taxis and cycles. To integrate the Boulevard with the rest of the development area and existing developments to the west, it is important that pedestrian links are provided east/west through the site to ensure permeability.

Outstanding parcels of undeveloped land should provide a mix of uses appropriate to a town centre location such as retail, leisure, office, community and residential. At ground level there should be active frontages to the boulevard. Development of sites to the east of the boulevard should allow for easy pedestrian access to the stadium.

The council will support proposals to relocate the existing 5-a-side football centre should be relocated to a nearby site on development of its current site.

Royal Route should provide an at-grade crossing with the boulevard to provide for public transport access.

The grade II listed Empire Pool (Wembley Arena) is one of the most significant historic buildings in Wembley. Any new development within close proximity of this building must provide a full and adequate assessment of potential impacts as part of a planning application.

Indicative Development Capacity (remaining)
- 1,500 units

Justification

13.18 Most of this area has been built out or is under construction. It is important that the development of remaining parcels is in accordance with a town centre location and maintains the boulevard connection through the area, thus building upon the huge changes that are being made to ensure that Wembley is a destination 365 days a year. Development in the area should also continue to contribute towards meeting the new housing target figures for the borough.

Comprehensive Development Area 13

York House

Context

13.19 The York House office building is immediately adjacent to the Designer Outlet centre development currently under construction. It is currently occupied and is unlikely to come forward for development in the near future. It has a large open car park fronting onto Empire Way

Planning History

13.20 Planning permission (LPA ref: 08/0827) granted in July 2008 to integrate the outlet centre into York House.

Site W 9

York House

(0.76 Hectares)

It is unlikely that York House will be redeveloped in the timescale of this Action Plan. However, there may be an opportunity to build on the car park. Any proposed development on the car park should be relatively low rise, mixed use and include a substantial area of open space. It should integrate with public realm improvements in the vicinity.

Indicative Development Capacity - 60 units

Justification

13.21 There is an opportunity to take advantage of the large open car park in front of York House to enhance the area and to provide new commercial space or to meet housing need.

NORTH WEST DISTRICT

Context

Area: 9.7 hectares

13.22 The North West District of Wembley's main regeneration area will provide a new heart for Wembley, with the 21st century Civic Centre and a major new shopping street linking through to the existing district centre at Wembley Park. It will be a new residential quarter forming part of a major mixed commercial and residential development supported by new public open space, car parking and good links to public transport. The northern part of the area, being close to Wembley Park station, is well located for business development where new purpose-built offices are an appropriate part of the mix.

13.23 Although much of the area is available for development, and there are existing planning consents for most of it, there are also some existing buildings which are unlikely to come forward for development in the foreseeable future such as the Fountain TV studios and the Quality Hotel. Additionally, the new Civic Centre is under construction and will be completed early in 2013.

Dexion House

Context

13.24 A part-occupied office building with potential for redevelopment. Within the designated Wembley Growth Area and town centre.

Planning History

13.25 Planning permission (LPA ref: 11/0142), granted in June 2011, for the development of a building ranging in height from 9 - 18 storeys, consisting of 661 bed spaces of student accommodation, 2,499sqm of community swimming-pool and fitness facilities and 530sqm of commercial units.

13.26 The council would support a comprehensive approach to the redevelopment of Dexion House and Malcolm House together should development of each site individually not come forward.

Site W 10

Dexion House

(0.37 hectare)

Mixed use development. Appropriate uses include retail, office, leisure, residential, student accommodation and hotel. The provision of a community swimming pool is a requirement for the site. Active frontage should

13 Comprehensive Development Area

be provided at ground level onto Empire Way. Height should not exceed 18 stories. Public pedestrian access from Empire Way to the rear of the site should be provided on redevelopment. Some landtake will be required at this site along Empire Way for the footway widening, as shown on the Proposals Map and in Appendix C.

Indicative Development Capacity (if residential)
– 129 units.

Justification

13.27 Although currently part occupied, the building is no longer attractive for occupation for office use and is appropriate for redevelopment meeting a variety of needs. Brent Planning for Sports and Active Recreation Facilities Strategy 2008-2010 identifies a significant lack of swimming pool provision in the borough and recommends a new pool is needed, including substantial need arising at Wembley associated with population growth from new housing, to serve central areas of the borough. The outstanding planning consent commits the community pool to this site.

Malcolm House

Context

13.28 Cleared site which was formally an office building at the junction of Fulton Road with Empire Way. Within the designated Wembley Growth Area

and town centre. It is very close to Wembley Park station so benefits from excellent public transport accessibility. It is, therefore, within the area identified as appropriate for purpose-built office development.

Planning History

13.29 Detailed planning permission (LPA ref: 08/2633) granted in 2008 for a part 7-storey and part 11-storey hotel with 262 rooms and ancillary restaurant/bar/meeting room with basement parking for 53 spaces, totalling a 10,791sqm of floor space.

13.30 As stated above, the council would support a comprehensive approach to the redevelopment of Dexion House and Malcolm House together.

Site W 11

Malcolm House

(0.21 hectare)

Mixed use development. Appropriate uses include retail, office, leisure, residential, hotel and community use. Active frontage should be provided at ground level onto Empire Way. Land will be required on redevelopment of the site for the junction improvement as shown on the Proposals Map.

Indicative Development capacity (if residential)
– 62 units.

Justification

13.31 It is a vacant site in need of development which could meet a range of needs. The junction improvement is necessary to help facilitate the density of development proposed for the area.

North West Lands

Context

13.32 This site comprises the formerly listed Palace of Arts and Palace of Industry, most of which have been demolished. Part of the site, fronting onto Engineers Way, is being developed as Brent Council's new Civic Centre, including an open space at the western end, scheduled to open in April 2013. Much of the remainder of the site is laid out as temporary car, with temporary accommodation for the Olympics also erected on the Engineers way frontage. The remaining development area, at 5 hectares, is the largest single development site outstanding in Wembley.

Planning History

13.33 Outline planning permission (LPA ref: 10/3032) granted in 2011 for 160,000sqm of mixed use development across 5.71 hectares including:

- Retail/financial and professional services/food and drink: 17,000sqm to 30,000sqm
- Office: up to 25,000sqm
- Hotel: 5,000sqm to 20,000sqm
- Residential: 65,000sqm to 100,000sqm (815 to 1,300 units)

Comprehensive Development Area 13

- Community: 1,500sqm to 3,000sqm
- Leisure and Entertainment: up to 5,000sqm
- Student accommodation/ serviced apartments/ apart-hotels: 7,500sqm to 25,000sqm

Site W 12

North West Lands

(5 hectares)

Mixed use development. Appropriate uses include retail, office, leisure, residential, student accommodation, hotel and community use.

A key element of the development of the North West Lands is the provision of the shopping street parallel to Olympic Way to the east of the Civic Centre to ultimately extend north of Fulton Road. It is important also that pedestrian links are provided east / west through the site to provide permeability between areas and onto Olympic Way. Active frontages should be provided at ground level to Olympic Way. A public open space of at least 0.4 hectares should be provided in the centre of the area. Development should include a publicly accessible car park.

Proposals should be accompanied by a flood risk assessment.

Land is required for the junction improvement at Engineers Way / Empire Way, as shown on the Proposals Map and in Appendix C.

Indicative Development Capacity - 815 units.

Justification

13.34 This is a key development site which will contribute to creating, alongside the Civic Centre, a new heart for Brent. A major new shopping street and park will give a focus to the area as well as providing new shops and services meeting the needs of the local community as well as visitors. It will also make a big contribution to meeting housing need.

Stadium Retail Park

Context

13.35 The site is dominated by two relatively large retail sheds and is adjacent to the Fountain TV studio complex. To the north of the site is Crescent House, a part of the College of North West London. There is also a McDonald's restaurant within the retail park. The buildings form a perimeter around a large car park that services the shops and the restaurant. There is potential to redevelop with a range of uses at significantly higher densities. The site is within the designated Wembley Growth Area and town centre.

Planning History

13.36 The Stadium Retail Park has no outstanding planning permissions and is currently occupied by retail and restaurant uses. There is no relevant planning history for this site.

Site W 13

Stadium Retail Park

(1.1 hectares)

Mixed use development with predominantly commercial uses. Appropriate uses include retail, office, leisure, student accommodation, hotel and community use with a limited amount of residential.

It is important that redevelopment of the site should allow for the extension of the pedestrian route from the shopping street to be developed in the North West Lands site south of Fulton Road. Active frontages should be provided onto Olympic Way.

Development should contribute towards environmental improvements, including road and junction adjustments on the gyratory at the junction of Wembley Park Drive, Empire Way and Bridge Road. Landscape improvements fronting onto Empire Way, and especially Olympic Way, should also be included.

13 Comprehensive Development Area

The site is in flood zones 1 and 2. All proposed development will require a detailed Flood Risk Assessment (FRA), in accordance with Section 6.7 of the Brent Borough SFRA. The 'sequential approach' at site level should be applied to steer more vulnerable development such as residential, student accommodation, hotels, and certain community uses towards areas of lowest risk within the site; north west area and southern edge. Density should be varied to reduce the number of vulnerable units in high risk areas. Further site-specific details are set out in the sequential test assessment for the WAAP.

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Indicative Development Capacity - 50 units

Justification

13.37 The site offers substantial development potential albeit in the longer term. The Wembley Masterplan suggests that there are a number of mixed use options where creative office and other accommodation can be combined with educational and commercial accommodation at lower levels with residential development in upper storeys. Proposals should maximise opportunities for development that would benefit from a town centre location with excellent public transport access and the close proximity to bus, rail and underground transport interchanges.

Arena House and Crescent House

Context

13.38 Arena House is located on the northern side of North End Road and is currently used by the College of North West London. It is a former office block converted to educational use in 1994. The site is close to Wembley Park station and therefore has good public transport links. The site is set back from Bridge Road on the western side, is bordered by the Metropolitan and Jubilee Lines to the rear and the new student accommodation block to the east. It is within both the designated Growth Area and the town centre.

13.39 Crescent House is currently vacant as the College has consolidated in nearby Arena House. The intention of the College now is to reoccupy the building without redevelopment and to vacate Arena House. Should redevelopment proposals come forward then account needs to be taken of Flood Risk Zone 2 across most of the site and the opportunity that may be presented to semi-naturalise, and provide better access to, the Wealdstone Brook which runs through the site in a concrete channel.

Planning History

13.40 Crescent House has detailed planning permission (LPA ref: 08/2672) granted in 2009 for the erection of an 8 and 9 storey educational facility. There is no relevant recent planning history for Arena House.

Site W 14

Arena House and Crescent House

(Arena House - 0.29 hectares and Crescent House - 0.37 hectares)

This site lies within the Strategic Cultural Area where leisure, tourism and cultural uses are particularly encouraged.

At least one of the buildings should be retained in educational use.

On redevelopment or conversion of either building appropriate uses include offices, education, student housing or hotel, providing active frontages on the ground floor.

Arena House is a suitable location for a tall building subject to preserving views of Wembley Stadium from Barnhill. A small area of land on North End Road and Bridge Road is required, as shown on the Proposals Map and Appendix C, to allow North End Road to be re-opened. Any new development should create a main entrance on Bridge Road.

The site is in flood zones 1-3. All proposed development will require a detailed Flood Risk Assessment (FRA), in accordance with Section 6.7 of the Brent Borough SFRA. While the council considers that developing the site provides wider sustainability benefits to the community that outweigh flood risk, a

Comprehensive Development Area 13

'sequential approach' at site level should be applied to steer more vulnerable development such as education, student accommodation and hotels uses towards areas of lowest risk within the site; to the western area. None of the proposed uses are compatible with flood zone 3b. Density should be varied to reduce the number of vulnerable units in high risk areas. A minimum 8 metres buffer zone must be provided for the waterway and development should contribute to the re-naturalisation of Wealdstone Brook. Further site-specific details are set out in the sequential test assessment for the WAAP. Any redevelopment of Crescent House should have regard to flood risk and flood risk assessment will be required. Opportunities to semi-naturalise the Brook and provide for public access will be sought on redevelopment of the site.

Justification

13.41 Because of the noise generated by the railway and station, ~~and the limited residential amenity, long term residential development of Arena House is not~~ will only be considered appropriate on the site if it meets outdoor amenity space requirements and provides sufficient noise and vibration attenuation against the railway line. Potential heights set out in the Wembley Masterplan need to be considered in the light of protection of local stadium views. The North End Road

connection is justified by the scale of development in the regeneration area and is a priority for funding from existing and new planning obligations/CIL.

13.42 Opportunities to enhance the brook by giving it a more natural appearance and improving tree cover should be taken. Providing public access alongside the brook will enhance open space provision locally as well.

NORTH EAST OLYMPIC WAY

13.43 The area includes a number of sites / land parcels which vary in terms of their potential for redevelopment. The most advanced is the former Shubette House site where a major scheme for a 225 bed hotel and 158 residential units is now under construction. South of this, Olympic House (0.28ha) is a recently refurbished 1980's office building with a large undeveloped space to the south whilst to the east there is Apex House (0.14ha), an industrial premises in multiple occupation by businesses, Karma house (0.17ha) which is currently occupied for business use but has planning consent for major redevelopment and to the north, at 1 Olympic Way, is the Olympic Office Centre (0.68ha) which is considered unlikely to come forward for redevelopment in the short to medium term.

13.44 The council is keen to retain office floor space, particularly on the well-located northern part of this area in order to maintain important employment generating floor space in a very accessible location. The council is also looking to

support employment generating and active uses for the east side of Olympic Way, limiting retail uses so that there is not a distraction from the new main shopping street on the west side of Olympic Way. There should also be active uses on to Engineers Way and Albion Way.

Apex House & Karma House

Context

13.45 These two adjoining industrial buildings are to the east of the former Shubette House site and face onto Albion Way. They are close to Wembley Park station and therefore they can benefit from higher densities enabled by very good public transport access. The site is within the Wembley Growth Area.

Planning History

13.46 Karma House has an unimplemented permission for a 120 bed hotel and 108 room apart-hotel (LPA ref: 05/0626).

Site W 15

Apex House & Karma House

(0.3 hectares)

This site lies within the Strategic Cultural Area where leisure, tourism and cultural uses are particularly encouraged.

13 Comprehensive Development Area

The Apex House and Karma House sites are suitable for hotel or residential development, providing commercial uses such as affordable work space on the ground floor. In spite of the extant permission on Karma House a courtyard type development, as illustrated in the Wembley Masterplan, is favoured for the site.

The site is in flood zones 1 and 2. All proposed development will require a detailed Flood Risk Assessment (FRA), in accordance with Section 6.7 of the Brent Borough SFRA. The ‘sequential approach’ at site level should be applied to steer more vulnerable development such as residential, and hotel uses towards areas of lowest risk within the site; area from north west to south. Density should be varied to reduce the number of vulnerable units in high risk areas. Further site-specific details are set out in the sequential test assessment for the WAAP.

Indicative Development Capacity (if residential)
- 85 units

Justification

13.47 A well-located site outside the designated SIL. Two relatively low-grade industrial buildings with ancillary offices which could be redeveloped at substantially higher densities.

1 Olympic Way

Context

13.48 1 Olympic Way is a prominent, refurbished 14 storey office building at the northern end of Olympic Way close to Wembley Park station and, consequently, with excellent public transport access. The proximity of Wealdstone Brook at the rear means that it is in flood zone 2.

Planning History

13.49 None relevant.

Site W 16

1 Olympic Way

(0.68 hectares)

This site lies within the Strategic Cultural Area where leisure, tourism and cultural uses are particularly encouraged.

Any redevelopment of the existing offices is expected to follow the form set out in the masterplan in order to maintain Olympic Way as an internationally recognised processional route to the stadium. Redevelopment should re-provide office floor space.

The site is in flood zones 1-3. All proposed development will require a detailed Flood Risk Assessment (FRA), in accordance with Section

6.7 of the Brent Borough SFRA. While the council considers that developing the site provides wider sustainability benefits to the community that outweigh flood risk, a ‘sequential approach’ at site level should be applied to steer more vulnerable development towards areas of lowest risk within the site; to the north. None of the proposed uses are compatible with flood zone 3b. Density should be varied to reduce the number of vulnerable units in high risk areas. A minimum 8 metres buffer zone must be provided for the waterway and development should contribute to the re-naturalisation of Wealdstone Brook. Further site-specific details are set out in the sequential test assessment for the WAAP.

~~The council would wish to improve the setting of the Wealdstone Brook and the tree belt through the north of the site. Opportunities to semi-naturalise the Brook and provide for public access will be sought on any redevelopment of the site. Redevelopment proposals must be accompanied by a flood risk assessment.~~

Development of this site should contribute to an upgrading of the northern part of Olympic Way including the underpass to Wembley Park underground station.

A small area of land on North End Road is required, as shown on the Proposals Map, and in Appendix C, to allow the road to be re-opened at the junction with Bridge Road.

Comprehensive Development Area 13

Justification

13.50 The building is ideally located for continued use as offices.

Olympic Way Office Site**Context**

13.51 The site includes the Olympic office block with a significant area of car parking to the south. It is a prominent site on the eastern side of Olympic Way and is within the Wembley Growth Area and the office block, which has recently been refurbished, is within the designated town centre.

development, while residential development should be confined to upper floors as set out in the Wembley Masterplan. The council will strongly encourage active ground floor uses such as cafés, restaurants and bars on the Olympic Way side. The building at the southern end should complement the park and the plot should provide a generous open space connecting to the new public open space on Engineers Way.

Development of this plot should also ensure that buses can be accommodated on Rutherford Way, turning in and out of Engineers Way and Fulton Road.

Indicative Development Capacity: 250 units

Justification

13.52 The main departure from the Wembley Masterplan is that the council is now proposing that buses are run up and down Rutherford Way and, therefore, the council accepts that a more formal building at the southern end of the Olympic office block site that marks the end of plot would be acceptable with a clear, generous and formal public open space link to the main park that will be laid out on the other side of Rutherford Way.

Wembley Retail Park**Context**

13.53 The site comprises the main retail park, containing retail and restaurant uses along with car parking, together with the Wembley Industrial Park to the east. The site is located on the north side of Engineers Way, to the east of Rutherford Way and to the south of Fulton Road. The site is almost equidistant from Wembley Stadium and Wembley Park stations. Development will come forward as leases on the retail park expire. The proposals are long term as the current leases have a long unexpired term. The council will shortly complete an option to secure the Wembley Industrial Park for a new primary school (to be provided when leases expire in 2017).

Planning History

13.54 The retail park was substantially re-built after consent was granted in 2004 (LPA ref: 04/2158). A further planning consent granted in 2011 (LPA ref: 11/1566) removed the restriction of bulky goods retail to the eastern part of the retail park subject to certain requirements which included a limit on the sub-division of units.

Site W 18**Wembley Retail Park**

(4.9 hectares)

Site W 17**Olympic Way Office Site**

(1.2 hectares)

This site lies within the Strategic Cultural Area where leisure, tourism and cultural uses are particularly encouraged.

The redevelopment of this site should largely mirror the development pattern on the western side of Olympic Way in scale and form - these are detailed and illustrated in the Wembley Masterplan. This requires the pulling back of taller elements to secure an 80m zone with maximum projections of 25m separated by 'outdoor rooms'. Office and hotel development would be acceptable throughout the

13 Comprehensive Development Area

This site will provide a new residential district supplying a high proportion of family sized housing including dwellings at ground level. The Wembley Masterplan sets out general 4-6 storey heights with taller elements (8-12 storeys) on identified corner plots on key junctions. Development should include a new public open space orientated east/west and facing onto Engineers Way. The emphasis is on a much more domestic scale and character than the regeneration area to the west of Olympic Way.

A new primary school will be provided on the site of the Wembley Industrial Park. If the site is not required for a new school then it will provide affordable housing as an alternative.

Indicative Development Capacity - 500

Justification

13.55 The council is looking to provide a mix and balance of housing types, hence the emphasis on family housing closer to the main open space and the potential provision of a new school. The retail businesses will be moved westwards into the defined town centre and the area best served by public transport, thus freeing up this site for lower density family housing. The Infrastructure and Investment Framework identified the need for new public open space, as well as a new school, to help develop and provide for a new community.

WEMBLEY STADIUM CAR PARK

Context

13.56 This site is currently the main Stadium car / coach park. It is immediately adjacent to the Stadium to the south of Engineers Way and west of First Way. It also accommodates Wembley Sunday Market on the northern part next to Engineers Way.

Planning History

13.57 Outline planning permission (LPA ref: 03/3200) granted in 2004 as part of Quintain's Stage 1 proposals to include major office and residential development and public space over a basement car / coach park.

Site W 19

Wembley Stadium Car Park

(4.5 Hectares)

This site lies within the Strategic Cultural Area where leisure, tourism and cultural uses are particularly encouraged. The site currently has permission for mixed use development including residential. A major leisure attraction as part of the mixed use regeneration is also sought to complement and add to Wembley's offer on stadium non event days. The Wembley Masterplan seeks the development of a major leisure attraction that will

~~complement and add to Wembley's offer on stadium non event days.~~ It is likely that the site is large enough, and in such close proximity to the Stadium, that a multi use complex can be accommodated and serviced. The physical and operational relationship between any new development and the Stadium will require careful policy management and planning.

Any development on the site which would result in the loss of coach and car parking would need to provide replacement coach and car parking elsewhere nearby (see policy WEM 17).

Justification

13.58 Since outline planning permission was granted for this site, concerns about the the security of basement coach parking being situated so close to the Stadium have arisen; this means that the consented basement coach / car parking is no longer suitable for this site. There is also no certainty that, without an upturn in demand for offices, major new office development will come forward on this site given that sites closer to Wembley Park station, because of the high level of public transport access, are more appropriate for offices.

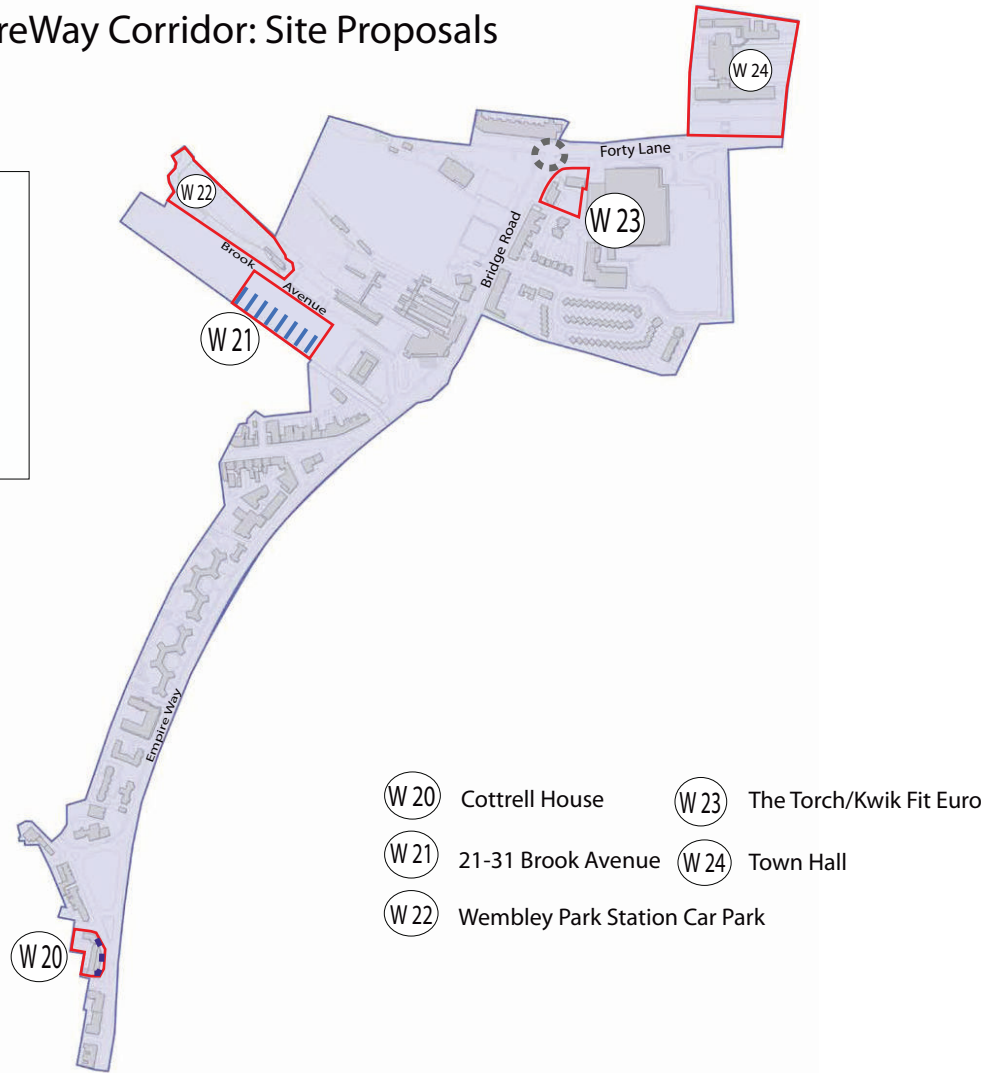
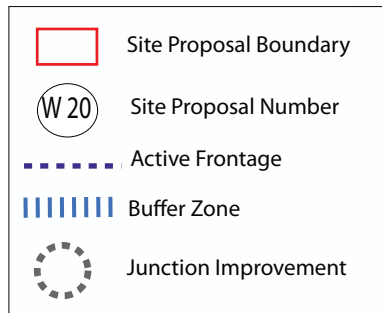
13.59 The scale of the stadium adjacent suggests building that may be up to 9 or 10 commercial storeys which would keep the majority of any new buildings mass beneath the lip of the main bowl of

Comprehensive Development Area 13

the Stadium. The site is a particular opportunity within Stage 1 of the Wembley Masterplan and the nature of the potential future uses means that the building form and scale will have to respond to the volumetric requirements of the use that it is intended to accommodate. A new attraction is important in keeping Wembley a busy and economically sustainable area. Events at the Stadium have helped to develop the local economy but Wembley needs to be attractive to potential visitors all day every day. A new complex may provide a snow or surf dome, a free fall wind tunnel or other sports facility. A major attraction of this type is appropriate to the east of Olympic Way because of the potential availability of sites and ease of access from the North Circular Road for the likely traffic generation. The site offers a significant challenge to designers but with innovative approaches there may be a potential, subject to access and servicing, for a new form of residential development above a large volume podium.

14 Wembley Park/Empire Way Corridor

Wembley Park/EmpireWay Corridor: Site Proposals



Map 14.1 Wembley Park/Empire Way Corridor: Site Proposals

Wembley Park/Empire Way Corridor 14

14.1 This section deals with potential development sites located outside of the comprehensive development area from Wembley Park towards Wembley Triangle.

Cottrell House & Norman House

Context

14.2 This site is located to the west of Wembley Hill Road. It comprises of Cottrell House which has residential, office and restaurant uses with a disused forecourt located on the ground floor and a car park at the rear. Adjacent to Cottrell House, is the Norman House office building which is located on the corner of Wembley Hill Road and Dagmar Avenue. There is an empty parcel of land located to the rear of this building. It is within the Wembley Growth Area.

Planning History

14.3 There is no relevant planning history for this site.

should provide amenity space. The design of new development on this site could be integrated with Norman House.

Indicative Development Capacity - 55 units

Justification

14.4 This site is currently underused and could be redeveloped or refurbished. It is suitable for housing because it is located in a residential area with good transport accessibility. The provision of housing will support the council's growth policy.

21-31 Brook Avenue

Context

14.5 These are detached and semi-detached houses opposite the station car park of Wembley Park which backs onto the Wealdstone Brook, hence part of the land is at risk from flooding. To the east is the major new residential development of 5-7 storeys. The proximity of Wembley Park station presents an opportunity to redevelop suburban housing at significantly higher density.

Planning History

14.6 In June 2011, planning permission was granted for a part 5,6 and 7 storey buildings comprising of 33 flats (planning ref: 10/2814).

Site W 21

21-31 Brook Avenue

(0.6 hectares)

Redevelopment for residential use including at least as many family sized units as would be lost and associated amenity space. ~~Development should provide a buffer to the brook of at least 8 metres and semi-naturalisation of the brook will be sought.~~

The site is in flood zones 1-3. All proposed development will require a detailed Flood Risk Assessment (FRA), in accordance with Section 6.7 of the Brent Borough SFRA. While the council considers that developing the site provides wider sustainability benefits to the community that outweigh flood risk, a 'sequential approach' at site level should be applied to locate homes towards area of lowest risk within the site; along Brook Avenue. The proposed use is not compatible with flood zone 3b. Density should be varied to reduce the number of vulnerable units in high risk areas. A minimum 8 metres buffer zone must be provided for the waterway and development should contribute to the re-naturalisation of Wealdstone Brook. Further site-specific details are set out in the sequential test assessment for the WAAP. Proposals in Flood Zones 2 and 3 must be accompanied by a flood risk assessment and the sequential test and

Site W 20

Cottrell House & Norman House

(0.2 hectares)

Mixed use development. Appropriate uses include residential, retail, commercial and community facilities. Residential development

14 Wembley Park/Empire Way Corridor

exception test should be applied. Development should not impede flood water flows and should not increase surface water run-off or reduce water storage. Basement dwellings will not be allowed in flood Zone 3.

Indicative Development Capacity - 160 units

Justification

14.7 This site is currently under used and it has excellent public transport accessibility, it is therefore suitable for high density residential development. Redevelopment of this site can contribute towards an improved setting for the Wealdstone Brook, including the delivery of open space and river restoration work to improve ecological diversity and climate change adaptation and help meet the requirements of the Water Framework Directive. This is supported by policy on Flood Risk in the Climate Change chapter and the Wealdstone Brook and River Brent policy in the Open Space chapter.

Wembley Park Station Car Park

Context

14.8 The site borders the railway line to the north, the remainder of the car park to the east, Brook Avenue to the south and Forty Avenue to the west. There are a number of mature trees along the southern and north western boundaries. Beyond

the site's north western boundary stands the Origin Housing Association three storey apartment block Pargraves Court.

Planning History

14.9 The site has no relevant planning history.

Site W 22

Wembley Park Station Car Park

(0.92 hectares)

The site is considered suitable for residential development including a significant proportion of family housing and appropriate amenity space. Mitigation for noise and vibration from the railway line to the north will be necessary.

Indicative Development Capacity - 100 units

Justification

14.10 The site is located in a predominantly residential area, outside the Wembley town centre, and is, therefore, considered suitable for residential development, which will contribute towards delivery of the council's growth strategy.

The Torch/Kwik Fit Euro

Context

14.11 This site is located on the corner of Bridge Road and Forty Lane. The Torch public house fronts Bridge Road and Kwik Fit Euro fronts Forty Lane. The Torch is located opposite the Ark Academy, with a pay and display car park located to the rear and to the south is a small parade of shops. Adjacent to Kwik Fit Euro is the Asda supermarket.

Planning History

14.12 There is no relevant planning history for this site.

Site W 23

The Torch/Kwik Fit Euro

(0.37 hectares)

Mixed use development. Appropriate uses include residential with retail at ground floor level. An active frontage should be provided at ground level on Bridge Road and Forty Lane. Any residential development should have regard to the neighbouring uses and provide amenity/open space. Proposals should take account of potential junction improvements.

Indicative Development Capacity - 100 units

Wembley Park/Empire Way Corridor 14

Justification

14.13 This site is suitable for housing because it is located in a predominantly residential area and in an area of good transport accessibility. Retail or other town centre uses on the ground floor is appropriate within the town centre. The provision of housing on this site will support the council's growth policy.

Town Hall**Context**

14.14 The site comprises of a Grade II Listed Building and is situated in a residential suburban area. There are outbuildings to the rear which have been added over time and these are not subject to the Listing. To the east, the site is bounded by The Paddocks, which is lined by two storey large suburban houses. Kings Drive runs along the western boundary, which is flanked by four storey apartment blocks. To the South are new multi storey housing units in Chalkhill.

14.15 More detailed guidance on the redevelopment of this site is contained in the Draft Town Hall Planning Brief 2011.

Planning History

14.16 The Town Hall was built in 1940 and was built in a modern art deco style. Planning permission was granted for a single storey detached building facing Kings Drive, planning ref: 05/0011.

Site W 24**Town Hall**

(2.1 hectares - 0.5 assumed developable area)

Mixed use development. Appropriate uses include offices, retail (for local needs only), residential, hotel and community facilities ensuring the retention of the Listed Building. Any change of use and/or development should enhance and not detract from the character and importance of the Town Hall, and have regard for existing traffic problems to surrounding residential areas and seek to improve these conditions. Due to the Listed Building status, the entire area has not been used to estimate the indicative development capacity. The area to the rear of the building could possibly be used for development. Height should not exceed the current height of the Town Hall of 5 storeys. A Flood Risk Assessment will be required as the site area is over 1 hectare.

Indicative Development Capacity - 156 units

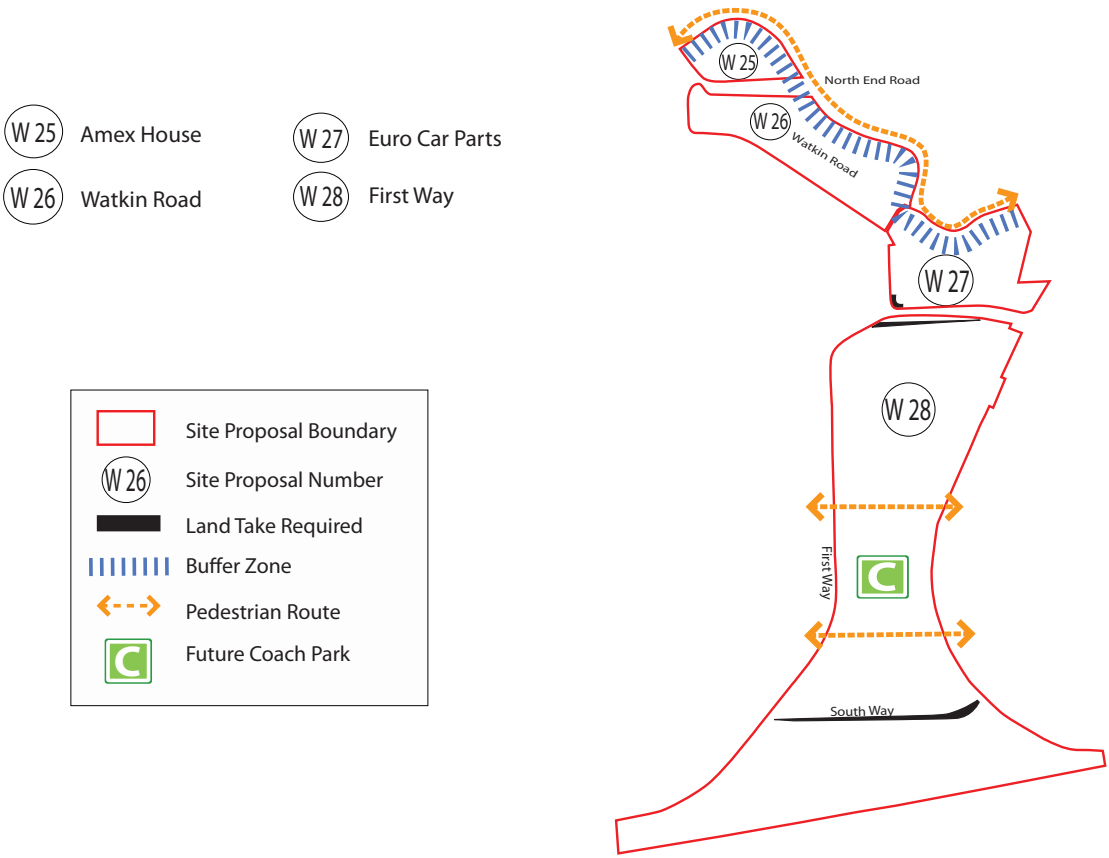
Justification

14.17 Brent Council is currently building a new Civic Centre on land off Engineers Way in Wembley and plans to vacate the Town Hall by mid 2013. The site allocation for the Town Hall is in keeping with the planning guidance set out in the Draft Brent

Town Hall Planning and Development Brief 2012 and with the council's adopted Site Specific Allocation W3. Brent Town Hall in the Site Specific Allocations DPD.

15 Wembley Eastern Lands

Wembley Eastern Lands: Site Proposals



Map 15.1 Wembley Eastern Lands: Site Proposals

Wembley Eastern Lands 15

15.1 These sites are mainly industrial in character but are outside the designated Strategic Industrial Location (SIL) and, being adjacent to the main regeneration area with relatively good access to public transport, provide an opportunity for sustainable redevelopment. Amex House, Watkin Road and Euro Car Parts sites have a common feature – the Wealdstone Brook which is part of the Blue Ribbon Network as designated in the London Plan. Currently the concrete channel is hidden and forgotten. The canalised brook, a tributary of River Brent, divides this site and the residential area, Dane and Empire Courts. The London River

Restoration Action Plan has identified this as an opportunity to restore and enhance the Blue Ribbon Network and, additionally the council have commissioned a study called 'Wealdstone Brook Restoration Proposals'. The Wealdstone Brook should be opened up so that it can become a focus and valuable asset to the area. The development of sites adjacent to the Brook will offer a significant opportunity for the creation of a “green network” to provide a continuous footpath system – a riverside walk and wildlife corridor. The improved setting will provide a better environment for those who are going to live or work there.

Amex House

Context

15.2 A mix of industrial storage, ancillary office buildings and car repair garages adjacent to the Wealdstone Brook within the northern section of

the Wembley regeneration area and within the Wembley Growth Area. The whole site is in Flood Zones 2 and 3.

Planning History

15.3 There is no relevant planning history for this site.

Site W 25

Amex House

(0.5 hectares)

Amex House site is appropriate for mixed use development, including residential, office and managed affordable workspace for creative industries, to support the wider regeneration of the Wembley Park area. Family housing should form part of the housing mix.

Biodiversity improvements and flood risk adaptation measures will be sought when development proposals come forward. A buffer strip of at least 10 metres wide should be retained for a publicly accessible brook-side park to allow for a cycle way/footpath, associated landscaping, tree planting and street furniture, as agreed in consultation with the Environment Agency and Brent Council.

Development should allow for a nodal point on the brook where the buffer strip should be widened to about 20 metres. Removal of part

of the canalised wall and regrading of the bank to provide a more natural setting will be sought. The site would be suitable for housing facing the brook providing the restoration work is carried out.

The site is in flood zones 2-3. All proposed development will require a detailed Flood Risk Assessment (FRA), in accordance with Section 6.7 of the Brent Borough SFRA. While the council considers that developing the site provides wider sustainability benefits to the community that outweigh flood risk, a 'sequential approach' at site level should be applied to steer more vulnerable development such as residential uses towards areas of lowest risk within the site; northern and southern areas. None of the proposed uses are compatible with flood zone 3b. Density should be varied to reduce the number of vulnerable units in high risk areas. Further site-specific details are set out in the sequential test assessment for the WAAP.

~~Proposals in Flood Zones 2 and 3 must be accompanied by a flood risk assessment and the sequential test and exception test should be applied. Development should not impede flood water flows and should not increase surface water run-off or reduce water storage. Basement dwellings will not be allowed in flood Zone 3.~~

Indicative Development Capacity - 150 units

15 Wembley Eastern Lands

Justification

15.4 This is an opportunity for a mixed use scheme in an important location delivering a mix of employment opportunities and meeting residential need. The site is well served by public transport and is close to existing and planned shops and services. Development at this site can bring forward an improved setting for the Wealdstone Brook including the delivery of open space and river restoration work to improve ecological diversity and climate change adaptation and help meet the Water Framework Directive.

Watkin Road

Context

15.5 The site is dominated by car repair garages, accompanied by a mix of industrial, storage and ancillary office buildings. It is in the Wembley Growth Area. The site is adjacent to Wealdstone Brook and predominantly in Flood Zones 2 and 3.

Planning History

15.6 There is no relevant planning history for this site.

Site W 26

Watkin Road

(1.5 hectares)

Watkin Road is appropriate for mixed use development including office, leisure, residential, managed affordable workspace (including for creative industries), and community use. Extra care housing or family housing could form part of any housing mix.

The site lies within the Strategic Cultural Area where leisure, tourism and cultural uses are particularly encouraged.

Biodiversity improvements and flood risk adaptation measures will be sought when development proposals come forward. A buffer strip of at least 10 metres wide should be retained for a publicly accessible brook-side park to allow for a cycle way/footpath, associated landscaping, tree planting and street furniture, as agreed in consultation with the Environment Agency and Brent Council.

Development should allow for two nodal points on the Brook where the buffer strip should be widened to about 20 metres. Removal of part of the canalised wall and regrading of the bank to provide a more natural setting will be sought. The site would be suitable for housing facing the brook providing the restoration work is carried out. Development of parts of the site outside of Flood Zone 3a will be required to contribute towards the restoration work.

The site is in flood zones 1-3. All proposed development will require a detailed Flood Risk Assessment (FRA), in accordance with Section

6.7 of the Brent Borough SFRA. While the council considers that developing the site provides wider sustainability benefits to the community that outweigh flood risk, a 'sequential approach' at site level should be applied to steer more vulnerable development such as residential, residential care homes, and certain community uses towards areas of lowest risk within the site; western and southern areas. None of the proposed uses are compatible with flood zone 3b. Density should be varied to reduce the number of vulnerable units in high risk areas. Further site-specific details are set out in the sequential test assessment for the WAAP. ~~Proposals in Flood Zones 2 and 3 must be accompanied by a flood risk assessment and the sequential test should be applied. Development should not impede flood water flows and should not increase surface water run-off or reduce water storage. Basement dwellings will not be allowed in flood Zone 3.~~

Indicative Development Capacity - 400 units

Justification

15.7 This is an opportunity for a mixed use scheme in an important location delivering a mix of employment opportunities and meeting residential need. The site is well served by public transport and is close to existing and planned shops and services. Development at this site can bring forward an improved setting for the Wealdstone

Wembley Eastern Lands 15

Brook including the delivery of open space and river restoration work to improve ecological diversity and climate change adaptation and help meet the Water Framework Directive.

Euro Car Parts

Context

15.8 The site consists of the retail warehouse of Euro Car Parts, its car park and the adjacent vehicle /skip site for Generay. The site is adjacent to Wealdstone Brook and is within the Wembley Growth Area.

Planning History

15.9 There is no relevant planning history for this site.

Site W 27

Euro Car Parts

(1.35 hectares)

The site is appropriate for mixed use development including office, leisure, residential, student accommodation, managed affordable workspace (including for creative industries), hotel and community use. The creation of an appropriate buffer between the existing industrial and new non-industrial uses will be required.

The site lies within the Strategic Cultural Area where leisure, tourism and cultural uses are particularly encouraged.

Biodiversity improvements and flood risk adaptation measures will be sought when development proposals come forward. A buffer strip of at least 10 metres wide should be retained for a publicly accessible brook side park to allow for a cycle way/footpath, associated landscaping, tree planting and street furniture, as agreed in consultation with the Environment Agency and Brent Council.

Development should allow for a nodal point on the brook where the buffer strip should be widened to about 20 metres. Removal of part of the canalised wall and regrading of the bank to provide a more natural setting will be sought. The site would be suitable for housing facing the river providing the river restoration work is carried out. Development will be required to contribute towards the restoration work.

The majority of the site is in flood zone 1; however there are small sections of flood zone 2 adjacent to the Wealdstone Brook. The buffer strip will remove the developable area of the site wholly into flood zone 1. Proposals must be accompanied by a Flood Risk Assessment. Development should not impede flood water flows and should not increase surface water run-off or reduce water storage.

Land is required for junction improvement at Fulton Road / Fifth Way / Engineers Way on redevelopment of the site as shown on the proposals map, and in appendix C.

Indicative Development Capacity - 360 units

Justification

15.10 This is an opportunity for a mixed use scheme in an important location delivering a mix of employment opportunities and meeting residential needs. The site is directly opposite the proposed primary school site. Development at this site can improve the setting for the school and the Stadium and can contribute towards an improved setting for the Wealdstone Brook, including the delivery of open space and river restoration work to improve ecological diversity and climate change adaptation and help meet the requirements of the Water Framework Directive.

First Way

Context

15.11 A mix of industrial, storage, warehouse uses and a waste facility to the east of Wembley Stadium. The site is in Wembley Growth Area and borders the Wembley Strategic Industrial Location. It is currently accessed at various points from the one way, gyratory system.

15 Wembley Eastern Lands

Planning History

15.12 A full planning application (12/1293) was received on 22 May 2012 for the redevelopment of Kelaty House at the northern end of the site. Proposals comprise the erection of 5 buildings ranging in height from 4 to 13 storeys for a mix of uses including hotel/serviced apartments, student accommodation and flexible business/retail/community/leisure uses and ancillary development including basement car park.

15.13 A full planning permission (10/2680) was granted to Generay on 18 January 2011 for the construction of an extension to existing waste transfer station to enclose existing operations.

Site W 28

First Way

(9 hectares)

The site lies within the Strategic Cultural Area where leisure, tourism and cultural uses are particularly encouraged.

The site is appropriate for mixed use development including leisure, hotels, offices, amenity/open space, residential development and student accommodation. The council is seeking the delivery of complementary land use relationships across the site. Alternatively, the creation of an appropriate buffer between the existing industrial and new non-industrial

uses will be sought. In particular, new development will be required to have careful regard for the relationship with, and impact of, the waste facility on Fifth Way and industrial units set along Second Way. Public transport accessibility improvements will be sought for development of this site. New streets/pedestrian routes are sought to create east-west links through the site. Short stretches of land, as shown on the Proposals Map and in Appendix C, will be required to enable the introduction of two way traffic on South Way/ First Way and improvements on Fifth Way and junction improvement at Fifth Way / Fulton Road / Engineers Way.

A Transport Assessment will be required to assess the impact of trip generation on the local and wider road network.

As the site is within easy walking distance of the Stadium, part of the site may be appropriate to meet the need for coach parking. Any new coach park should be used for non parking activities outside of event days to maximise job opportunities.

Proposals must be accompanied by a Flood Risk Assessment as the site is over 1ha in size.

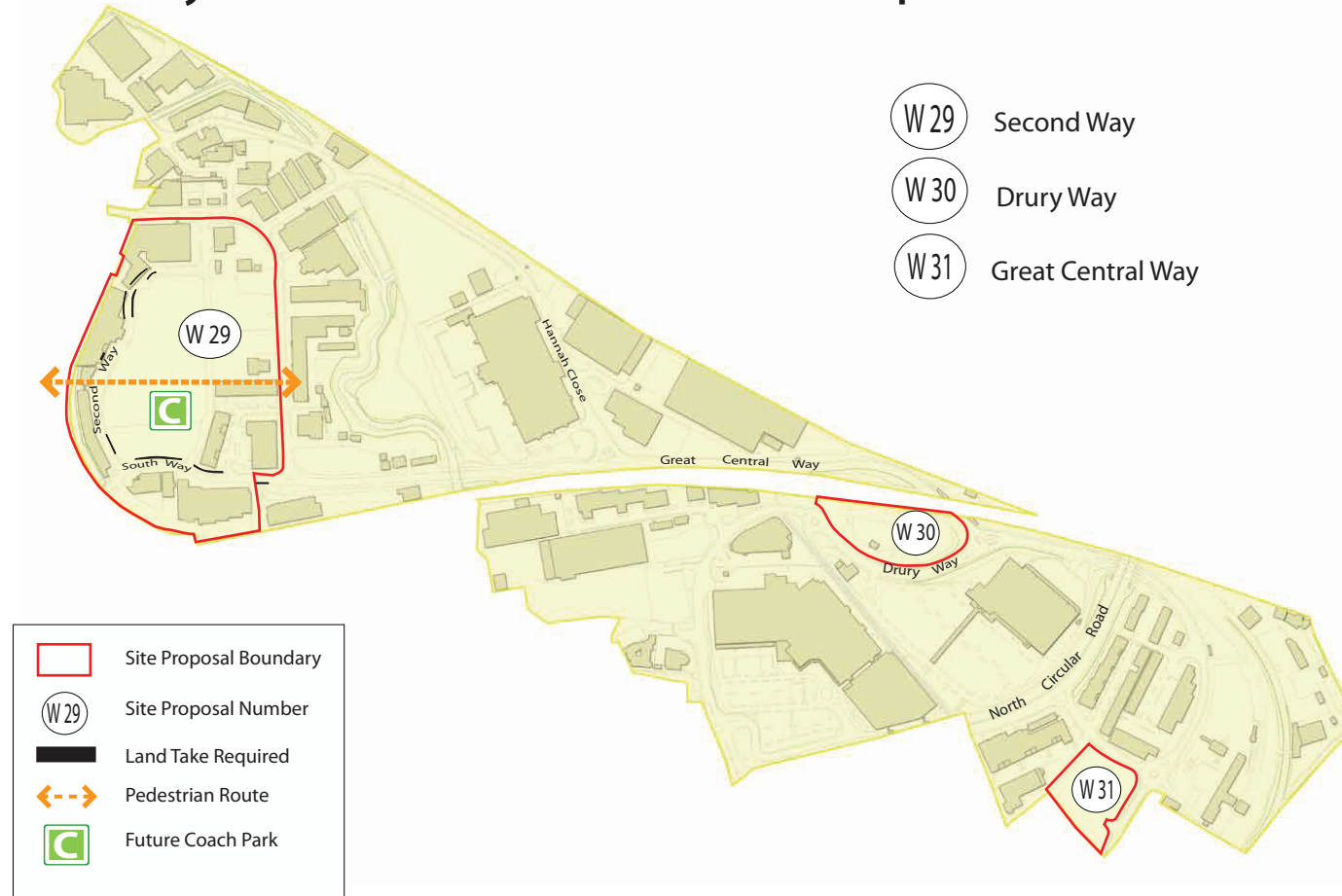
Indicative Development Capacity - 1,500 units

Justification

15.14 Wembley is the main focus for growth and economic development in the borough. This is a major opportunity for a new urban quarter with new floor space for jobs, new homes and hotel bedrooms, taking advantage of the new Stadium and public transport accessibility. A mix of uses will deliver jobs and homes and bring about greater movement for pedestrians and cyclists. Development will help to define a regenerated employment area to the east and deliver a managed land use relationship between higher and lower value land uses.

Wembley Industrial Estates 16

Wembley Industrial Estates: Site Proposals



Map 16.1 Wembley Industrial Estates: Site Proposals

16 Wembley Industrial Estates

16.1 All three sites in this section fall within the SIL so there are constraints on the type of uses that are acceptable in accordance with policy CP21 of the Core Strategy and Policy 2.17 of the London Plan. Additionally the specific location of two of the sites gives rise to further constraints on the nature of uses acceptable. The sites do benefit from good access to the North Circular Road.

Second Way

Context

16.2 The main feature dividing the First Way site and the Second Way site is the former railway loop which was constructed for the British Empire Exhibition held at Wembley in 1924 -1925 but which has since been partly used for waste management. The site once had an important regional and local function when major food manufactures were located here. Apart from light industry and offices occupying Metro Trading Centre, Pyramid House and the Tower Business Park, the rest of the area is used for open storage, depot, car parks and storage for recycling materials. The site is within the area proposed as a business park.

16.3 This site should continue to provide jobs whilst capitalising on the development potential of industrial plots. It is the Eastern Gateway to the Stadium. A large proportion of people coming to Wembley by car travel directly past this site, and first impressions are likely to be lasting. It is Brent Council's aspiration to see the site transformed so that it provides a better setting and environment for

workers and visitors. South Way was once proposed to be straightened and widened to improve traffic flow on event days. However circumstances have changed and now only minor road alignments are needed to return the road to two way operation.

Planning History

16.4 In January 2011 planning permission (10/2367) was granted for a change of use of Unit 4, Second Way, from warehouse to waste transfer station for a limited period of five years.

Site W 29

Second Way

(10.21 hectares)

The site is considered suitable for uses in line with CP20 including offices, light industrial and higher value general industrial, utility and transport functions, wholesale markets, small scale distribution and Sui Generic uses that are closely related offices, light industry, storage and distribution, some transport related functions, utilities and wholesale markets. Given the proximity of potential residential uses on First Way, the site is not considered suitable for long term occupation by waste management uses, including aggregate storage and transfer. The relocation of such uses to the Preferred Industrial

Location (PIL) north and east of Fourth Way will be encouraged. In view of the site being within walking distance of the Stadium, part of the site is maybe appropriate as a "satellite" coach park if replacement or additional coach parking is needed. Any new coach park should be used for non parking activities on non event days. If part of the site were to be used as a coach park then a dedicated, safe pedestrian route to the Stadium should be created. Several short stretches of land (as shown on the Proposals Map and in Appendix C) would be required to enable the introduction of two way traffic on South Way and wider highway improvements within the area.

Justification

16.5 This site is in a SIL and currently designated as a Preferred Industrial Location (PIL) in the London Plan. The council is proposing a change of designation to Industrial Business Park which is more in keeping with its location adjacent to a non-industrial area of regeneration. ~~It is also designated as a business park.~~ The proposed uses are compatible with ~~these~~ this designations.

Drury Way

Context

16.6 The site, currently used as a builder's storage yard and depot, is located within a designated SIL and is on a main route to the

Wembley Industrial Estates 16

Stadium an regeneration area. To the north of the site is the Chiltern Railway Line, Metropolitan and Jubilee lines. There is a small area of open space to the west and is a road junction where Great Central Way meets Drury Way to the east of the site. To the south of the site is Tesco super store and Ikea.

Planning History

16.7 There is no relevant planning history for this site.

sidings is supported by the London Plan Policy 6.14 which requires the protection of existing sites which enable transfer of freight to rail or water. Waste management use is inappropriate because of the environmental impacts on one of the main access routes to the Stadium and the rest of the regeneration area.

Great Central Way

Context

16.9 The site, located east of the North Circular Road on the corner of Great Central Way and Yeats Close, is currently vacant. It is diamond shaped and borders Great Central Way and the North Circular Business Park to the north east, Brent Trading Estate to the north west, allotments to the south west and the residential Lynton Close and Yeats Close to the south east. Access to the site is via a roundabout off Yeats Close. The site is in a Strategic Industrial Location. The western part of the site is of Borough (Grade II) Nature Conservation Importance.

Planning History

16.10 In 2004, a planning application granted for the erection of two buildings for B1, B2 and B8 use, a single large industrial unit of 3,730sqm, and a smaller 600sqm two storey building.

Site W 31

Great Central Way

(0.96 hectares)

The site is considered suitable for industrial, warehousing or other business uses, subject to a full ecological appraisal and appropriate mitigating measures. Given the proximity of residential uses on Lynton Close and Yeats Close to the south east of the development, the site is not considered suitable for waste management use.

Justification

16.11 The site is in a SIL and designated for employment uses, but proximity to residential uses constrains the range of uses that are appropriate. It is also on a major route to the Stadium and regeneration area.

Site W 30

Drury Way

(1.21 hectares)

Industrial and employment uses are suitable for this site. Waste management will not be acceptable in this location. This site is adjacent to protected railway sidings and proposals could make use of these railway sidings. The site is not within an identified flood zone however proposals must be accompanied by a Flood Risk Assessment as the site area is over 1ha.

Justification

16.8 This site is in a SIL. The council is seeking industrial or other employment development uses for this site. The promotion of the use of the railway

17 Delivery and Monitoring

Delivery

17.1 Achieving the council's vision for Wembley will mean that the area is transformed from that which pre-dates the rebuilding of the Stadium. This transformational change is already well underway with substantial major development completed, under construction or committed. Also important in delivering regeneration, and new development in particular, is the provision of the necessary infrastructure, both to meet the needs of the increasing resident population but also to meet the needs of the increasing number of visitors to the area. Much of this new infrastructure has been completed, such as the rebuilding of Wembley Park station and improvements to the Jubilee line which have increased capacity. A much needed new secondary school, the Ark Academy, has also been provided. However, much remains to be done as outlined in this Plan.

17.2 The section of Brent's Core Strategy which deals with Monitoring and Implementation explains how the strategy for development in the borough as a whole is to be delivered. This obviously applies to Wembley so it is unnecessary to repeat it all here. However, it is worth highlighting again that an Infrastructure and Investment Framework (IIF) was produced alongside the Core Strategy. This sets out the requirements resulting from the implementation of the growth and regeneration strategies of the LDF as a whole. There is a section on Wembley within the IIF which details the infrastructure requirements of the Wembley Growth Area. It includes information about potential funding sources. Opportunities will be sought from a variety of these sources to complement the private sector development funding to help facilitate the delivery of enabling infrastructure. The IIF was updated in 2011 to take account of changing circumstances and it will be reviewed periodically during the plan period.

17.3 As the council has very few land or property holdings in the area aside from its own offices, achieving the vision is reliant upon implementation of the Plan by private sector developers and landowners. The council has formed and will continue to form therefore, partnerships with key developers such as Government Agencies, the Mayor of London, neighbouring boroughs and RSLs as well as helping to facilitate development by the private sector. Key to this are the plans and planning guidance for Wembley which form part of the borough's Local Development Framework.

Monitoring

17.4 In order to assess progress in the delivery of the Plan it is necessary to monitor development in the area against the objectives that have been set. This involves the setting of targets and measuring progress against those targets in the council's Annual Monitoring Report. Given that Wembley is providing half of the borough's new housing growth and most of the commercial growth, nearly all of the monitoring indicators set out in the Core Strategy are relevant to Wembley and, therefore, development in Wembley is monitored as part of those measures. There are also some targets and performance measures that have been specifically established for Wembley in the Core Strategy. These are set out below:

Delivery and Monitoring 17

STRATEGIC OBJECTIVE 1

Promoting Economic Performance & Regeneration - by creating five main growth areas of mixed use, mixed tenure development, the largest being Wembley which will be the main focus of new retail and town centre uses (expanding the town centre eastwards into the Stadium area).

Delivery Agencies: Developers, Brent Council

Performance Measure	Target	Monitoring Point	Specific Policies to be monitored
Local Indicators:			
Local employment change.	10,000 new jobs within Wembley to 2026.	Net increase of 500 jobs p.a. in Wembley area. When: Annually	Policies CP1, CP3 and CP7
Amount of new retail floorspace developed by type in Wembley.	30,000 m ² increase in the new retail floorspace in Wembley, on that currently existing or consented, by 2026.	Percentage and amount of completed gross retail floorspace by type in Wembley. When: Annually	Policies CP1, CP7 and CP16

STRATEGIC OBJECTIVE 8

Reducing the Need to Travel and Improved Transport Choices – by completing first class retail and other facilities in Wembley that reduces the need to travel to other centres. Improving key transport interchanges of Wembley, Alperton, First Central and Queen's Park. Promoting access by public transport, bicycle or on foot and reducing car parking standards for growth areas because of their relative accessibility. Reducing modal share of car trips to Wembley from 37% towards 25%. Completing at least 5 car- free schemes per annum in the Plan period.

Delivery Agencies: Brent Council, Greater London Authority (GLA), Highways Agency & Transport for London (TfL)

Performance Measure	Target	Monitoring Point	Specific Policies to be Monitored
Local Output Indicators:			

17 Delivery and Monitoring

Proportion of trips made by public transport. <u>Reducing proportion of car trips.</u>	Reducing proportion of car trips as a result of Wembley development from a baseline (currently estimated at 37%), <u>towards 25%</u> by a minimum of 10% over the life of the development.	MVA model currently calculates modal share if no intervention of 37% car use. Re-run model to refine estimates as land uses become more certain. Monitor targets through the travel plan process. <u>The transport target to reduce the mode share of car trips from 37% towards 25% will be monitored using the outcomes of travel plan monitoring which is undertaken annually as part of the obligation on developers to report on progress made towards their travel plan targets.</u> When:<u>annually</u> every 3-5 years	CP7
Secure interchange improvements.	Secure major improvements at Wembley Stadium and Wembley Central stations by 2017.	Record Planning Obligations and direct works that secure improvements. When: Annually	CP14 and CP15

STRATEGIC OBJECTIVE 9

Protecting and Enhancing Brent's Environment - by preserving the borough's open spaces for recreation and biodiversity and creating new and enhanced open spaces to address deficiencies where possible, but particularly to meet the needs of additional population commensurate with current levels of provision. To increase the amount of public open space in the borough (and at least 2.4ha within Wembley) and the amount of land with enhanced ecological value. Enhance the borough's green and blue infrastructure by tree planting, returning rivers to their more natural courses and mitigating the pollution effects of development. To protect the borough's built heritage.

Delivery Agencies: Brent Council, Greater London Authority (GLA), Environment Agency, Developers.

Delivery and Monitoring 17

Performance Measure	Target	Monitoring Point	Specific Policies to be Monitored
Local Output Indicators:			
Provision for new or extended public open space.	To meet open space targets in growth areas Wembley - 2.4ha.	Measure new open spaces created and laid out as a result of development. When: Annually	CP7, CP8, CP9, CP11, CP12 and CP18
New Tree Planting for new neighbourhoods.	To meet tree planting targets in growth area set out in IIF, by 2017 Wembley 1,000.	Count of new trees planted in growth areas. When: Annually	CP7, CP8, CP9, CP10, CP11 and CP12

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STRATEGIC OBJECTIVE 10

Achieving Sustainable Development including mitigating and adapting to climate change - By promoting mixed use, mixed tenure development in growth areas integrating infrastructure and housing provision, reducing energy demand in the growth areas from current building regulation standards and by achieving exemplar low carbon schemes and CHP plants.

Delivery Agencies: Brent Council, Greater London Authority (GLA), PCT

Performance Measure	Target	Monitoring Point	Specific Policies to be Monitored
Local Output Indicators			
Secure district wide CHP in Wembley Area.	Complete one CHP plant.	To meet GLA energy hierarchy on very large regeneration schemes. When: Annually	CP7

17.5 In addition, the council will monitor the following indicators which relate to policy / proposals which are specific to the Wembley AAP which are not covered by indicators set out in the Core Strategy.

17 Delivery and Monitoring

OBJECTIVE

Promoting Wembley as a global and distinctive tourist destination -To provide a world class setting for a world class Stadium by creating a distinctive place with high quality building design and a positive sense of identity that is sustainable and enables progress to a low carbon future.

Promoting new public art to support regeneration.

Delivery Agencies: Brent Council, Greater London Authority (GLA)

Performance Measure	Target	Monitoring Point	Specific Policies to be Monitored
Output Indicators			
Tagged buildings	None in areas deemed inappropriate.	Measure number of consents When: Annually	WEM5

OBJECTIVE

Promoting improved access and reducing the need to travel by car - To create a well connected and accessible location where sustainable modes of travel are prioritised and modal share of car trips to Wembley is reduced from 37% towards 25%.

To ensure that the infrastructure of Wembley is upgraded so that it supports new development and meets the needs of the local community.

To complete first class retail and other facilities in Wembley that reduces the need to travel to other centres and improving key transport interchanges.

To promote access by public transport, bicycle or on foot and reduce car parking standards because of Wembley's relative accessibility.

Delivery Agencies: Brent Council, Greater London Authority (GLA), TfL

Performance Measure	Target	Monitoring Point	Specific Policies to be Monitored
Output Indicators			

Delivery and Monitoring 17

Road / Junction Improvements	All those proposed implemented in lifetime of the Plan.	Number of schemes completed. When: Annually	WEM13 & 14
Roads pedestrianised or with shared surface	Provided with redevelopment in Comprehensive Development Area.	Length of street pedestrianised or with shared surface When: Annually	WEM17

OBJECTIVE

Housing Needs - To achieve housing growth and meet local housing needs by promoting development that is mixed in use, size and tenure.

To achieve 50% (approx.) of new housing as affordable.

Delivery Agencies: Brent Council, Greater London Authority (GLA)

Performance Measure	Target	Monitoring Point	Specific Policies to be Monitored
Output Indicators			
Family-sized units	Achieve at least 25% of total new units in Wembley.	Number of units consented When: Annually	WEM21
Extra care housing	At least 1 scheme delivered in Wembley by 2017.	Number of units consented When: Annually	WEM22
Student accommodation	No more than 5,000 student bedspaces by 2026.	Number of beds consented When: Annually	WEM25

OBJECTIVE

17 Delivery and Monitoring

People's needs and associated infrastructure - To meet social infrastructure requirements by securing provision for needs arising from new housing development, especially the provision of new education, health and community facilities.

To provide community facilities to meet the needs of Brent's diverse community.

To promote sports and other recreational activities by placing particular emphasis on the provision of new facilities to address existing deficiencies and to meet the needs of new population.

To promote healthy living and create a safe and secure environment.

Delivery Agencies: Brent Council, Greater London Authority (GLA)

Performance Measure	Target	Monitoring Point	Specific Policies to be Monitored
Output Indicators			
Hot food take-aways	No more than 7% in any length of frontage.	Shop unit survey When: Annually	WEM28

OBJECTIVE

Protecting and enhancing the environment - To preserve open spaces for recreation and biodiversity and create new and enhanced open spaces to address deficiencies where possible, but particularly to meet the needs of additional population commensurate with current levels of provision.

To increase the amount of public open space (at least 2.4ha within Wembley) and the amount of land with enhanced ecological value.

To enhance green and blue infrastructure by tree planting, returning rivers to their more natural courses and mitigating the pollution effects of development.

To achieve sustainable development, mitigate & adapt to climate change.

To reduce energy demand from current building regulation standards and achieve exemplar low carbon schemes and a combined heat and power plants.

Delivery Agencies: Brent Council, Greater London Authority (GLA), West London Waste Authority, Environment Agency

Delivery and Monitoring 17

Performance Measure	Target	Monitoring Point	Specific Policies to be Monitored
Output Indicators			
Energy from waste	1 energy from waste plant in Wembley in the plan period.	Planning permission When: Annually	WEM33
Improvements to access to open space	Various proposals implemented in the plan period.	Completed schemes When: Annually	WEM36
Food growing	At least 1 scheme established as part of new development by 2017.	Completed schemes When: Annually	WEM38
Semi-naturalisation of Wealdstone Brook	150 metres semi-naturalised by 2022.	Completed schemes When: Annually	WEM42

17.6 Monitoring of site proposals will also be measured in the Annual Monitoring Report. No phasing of development has been estimated. The vast majority of sites are privately owned and will be brought forward for development by private developers so there is little opportunity for the council to intervene directly to ensure implementation. Where it is apparent that development is not being brought forward as anticipated then the council will seek to establish with land owners or agents what the obstacles to delivery are.

17.7 Sites will be monitored to not only establish whether development is being brought forward but also whether it is in accordance with the guidance set out in this Plan.

18 Appendix A: Superseded Policies

18.1 Chapter 14 of Brent UDP 2004, Wembley Regeneration Area, will be replaced in its entirety (i.e. policies WEM1 - WEM31) by the Wembley Area Action Plan when it is adopted.

18.2 In addition, the table below sets out those allocations in the Site Specific Allocations DPD, July 2011, of the Local Development Framework that will be superseded by new site proposals in the Wembley Area Action Plan

Site Specific Allocations DPD, July 2011. Allocations Superseded	Superseded by Wembley Area Action Plan Policy/Proposal
W1. Wembley West End	Site W1 Wembley West End
W3. Brent Town Hall	Site W24 Town Hall
W4. Shubette House/Karma House/Apex House	Site W15 Apex House & Karma House
W5. Wembley Eastern Lands	Site W28 First Way
W6. Amex House	Site W25 Amex House
W7. Chesterfield House	Site W4 High Road / Chiltern Line Cutting South
W8. Brent House and Elizabeth House	Site W5 Copland School & Brent House
W9. Wembley High Road	Site W4 High Road / Chiltern Line Cutting South
W10. Wembley Chiltern Embankments	Site W3 Chiltern Line Cutting North

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Affordable Housing

Housing, whether for rent, shared ownership or outright purchase, provided at a cost considered affordable in relation to incomes that are average or below average, or in relation to the price of general market housing.

Amenity Space

External amenity space comprising gardens (private and communal), roof terraces and balconies should normally have some sunlight, and should normally be directly accessible from a room other than a bedroom. The ground level amenity space should be mainly grassed and landscaped. For family housing and category 1 elderly person's accommodation, amenity space should mainly be provided in the form of gardens (in the latter case wheelchair accessible planting bays should be provided).

Areas of Low Townscape & Public Realm Quality

Priority design areas where a higher level of positive design policy and development control is required to ensure improvement of areas which currently have a low quality of architecture and landscape.

Blue Ribbon Network

Mayor's spatial policy which includes the Thames, the canal network, the other tributaries, rivers and streams within London and London's open water spaces such as docks, reservoirs and lakes. It includes culverted (or covered over) parts of rivers, canals or streams.

Brownfield Sites (see also previously developed land)

Previously developed urban land. Government strategy is to maximise new development on Brownfield sites.

Community Infrastructure Levy (CIL)

As set out in the Planning Act 2008, it is a levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area. The rates are set locally and are charged on new developments on the basis of £ per square metre. It would normally be charged on developments which result in a net increase of more than 100sqm on a site, or the creation of one or more new dwellings.

Density (Housing)

The number of dwellings per net residential area, normally measured in Habitable rooms per hectare but sometimes by dwelling per hectare.

Development Plan

It sets out the objectives, policies for development in an area. Prior to the commencement of the Planning Compulsory and Purchase Act 2004, London boroughs were required to prepare a Unitary Development Plan for their areas under the Town and Country Planning Act 1990. The London Plan now forms part of Brent's Development Plan.

Family Housing

A self-contained dwelling that is capable of providing 3 or more bedrooms.

Green Chains

These are areas of linked but separate open spaces and the footpaths between them. They are accessible to the public and provide way- marked paths and other pedestrian and cycle routes.

Industrial Business Park (IBP)

Strategic Industrial Locations that are particularly suitable for activities that need better quality surroundings including research and development, light industrial and higher value general industrial, some waste management, utility and transport functions, wholesale markets and small scale distribution. They can be accommodated next to environmentally sensitive uses. These are areas of linked but separate open spaces and the footpaths between them. They are accessible to the public and provide way- marked paths and other pedestrian and cycle routes.

Key Diagram

The diagrammatic interpretation of the spatial strategy as set out in the Core Strategy. (As distinct from a Structure Plan Key Diagram prepared to explain its policy content).

Kyoto Protocol

The Kyoto Protocol signed in 1992, was designed to take the United Nations Framework Convention on Climate Change (agreed in 1992) aspiration of stabilising greenhouse gas emissions a step further. It was the first ever international treaty to set legally binding emission reduction targets on developed countries that have ratified it. Developed countries agreed to targets that will reduce their overall emissions of six greenhouse gases (carbon dioxide,

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methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons and sulphur hexafluoride) by 5.2% below 1990 levels over the period 2008-2012.

Major Proposal

10 or more residential units, 1000sqm (or more) gross commercial space, also includes new schools and hospitals.

Major Retail Development

Development for retail use which provides for more than a purely local service such as a superstore (over 2,500sqm).

Major Town Centres

They are the principal centres in a local authority's areas which function as important service centres, providing a range of facilities and services for extensive catchment areas.

National Planning Policy Framework

Published in March 2012, it sets out the government's planning policies for England and how these are expected to be applied. It must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions.

Open Space

Open space is land, airspace, or a body of water or a combination of these elements which is relatively free of buildings and/or surface infrastructure. It can be both public or private. The broad range of open spaces that may be of public value include: parks and gardens; natural and semi-natural urban greenspace; green corridors;

outdoor sports facilities; amenity greenspace; provision for children and teenagers; allotments, community gardens, and city farms; cemeteries and churchyards; accessible countryside in the urban fringe areas; and civic spaces, including civic and market squares, and other hard surfaced areas designed for pedestrians. There is a general presumption against the loss of open space, and it will therefore be protected from inappropriate development. Inappropriate development in this context is defined to be any development harmful to the use or purpose as open space.

Opportunity Areas

Areas designated in the London Plan as offering opportunities for accommodating large scale development to provide substantial numbers of new employment and housing, each typically more than 5000 job and/ or 2500 homes, with a mixed and intensive use of land and assisted by good public transport accessibility.

Planning Permission

Formal approval given by a local planning authority for Development requiring planning permission, usually valid for three years for a full permission or three years for an outline permission in which details are reserved for subsequent approval.

Play Space

A dedicated safe area for children and young person's to play. New housing developments with family sized accommodation should provide external communal children play space, either

through new provision or enhancement of existing facilities as appropriate in relation to the scale of the family sized accommodation.

Public Realm

Public realm is the space between and within buildings that are publicly accessible, including streets, squares, forecourts, parks and open spaces.

Preferred Industrial Locations (PIL)

Strategic Industrial Locations that are particularly suitable for general industrial, light industrial, storage and distribution, waste management, recycling, some transport related functions, utilities, wholesale markets and other industrial related activities.

Public Transport Accessibility Levels (PTAL)

PTAL, as adopted by TfL, indicate public transport accessibility represented on Map 6.2. They assist boroughs in assessing appropriate parking provision. The PTAL score ranges from 1 (very poor) to 6 (excellent). 'Good' public transport is defined by TfL as being PTAL levels 4 and above.

Section 106

Is the section under the Town and Country Planning Act 1990 provides for the creation of 'Planning Obligations'. A Planning Obligation is a legal undertaking entered into in connection with a planning permission under Section 106 of the Town and Country Planning Act 1990. Such obligations may restrict development or use of land; require operations or activities to be carried out in, on, under or over the land; require the land to be used

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in any specified way; or require payments to be made to the planning authority either in a single sum or periodically. Planning obligations may be created by agreement or by unilateral undertakings on the part of the developer/ owner of the land.

Sequential Approach

The National Planning Policy Framework encourages the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. A sequential test should be applied to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up to date Local Plan. The sequential approach requires the allocation or development of certain types or locations of land before others e.g. town centre locations before edge of centre locations before out of town locations.

Sites of Importance for Nature Conservation

A series of sites identified by the Greater London Authority and Brent Council that represent the best wildlife habitats and nature conservation sites in the borough. Sites are classified into Sites of Metropolitan, Borough (Grade I and II) and Local Importance for Nature Conservation.

Social Infrastructure

Covers facilities such as health provision, early years provision, schools, colleges and universities, community, cultural, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities.

Strategic Cultural Area

An area with internationally important cultural institutions, which are also major tourist attractions.

Strategic Industrial Location (SIL)

Coherent areas of land within the main industrial estates which are, in terms of environment, road access, location, parking and operating conditions, well suited for retention in industrial use.

Supplementary Planning Document (SPD)

Guidance additional and supplementary to the Local Development Framework on how to implement its policies, similar to the former Supplementary Planning Guidance for the UDP.

Sustainable Development

Development which meets the needs of the present without compromising the ability of future generations to meet their own needs and aspirations (Resolution 42/187 of the United States General Assembly)

Sustainable Urban Drainage System (SUDS)

SUDS is an alternative approach to conventional urban drainage which have been developed to cope with drainage water in an environmentally save way. SUDS can reduce pressure on the existing

drainage systems, prevent or reduce the likelihood of flooding and may also help clean up pollutants in run-off.

Tall Buildings

Buildings or structures that are more than 30 metres in height or significantly taller than surrounding development.

Transport nodes

Major transport interchanges, where people can easily transfer from one mode of transport to another. i.e. where buses, mainline rail services, and tube lines meet.

Travel Plans (Sometimes called Green Travel or Commuter Plans)

A document submitted as part of a transport impact assessment setting down proposed measures by the developer to deliver sustainable transport objectives, including: measures for reducing car usage (particularly single occupancy journeys) & promoting and securing increased use of walking, cycling and public transport.

Waste Hierarchy

The order of the most desirable waste management options, in which the prevention and reduction of waste are prioritised, then the reuse and recycling options and lastly the optimisation of its final disposal. The concept is described by the "3Rs" – Reduce, Reuse, Recover – followed by unavoidable disposal.

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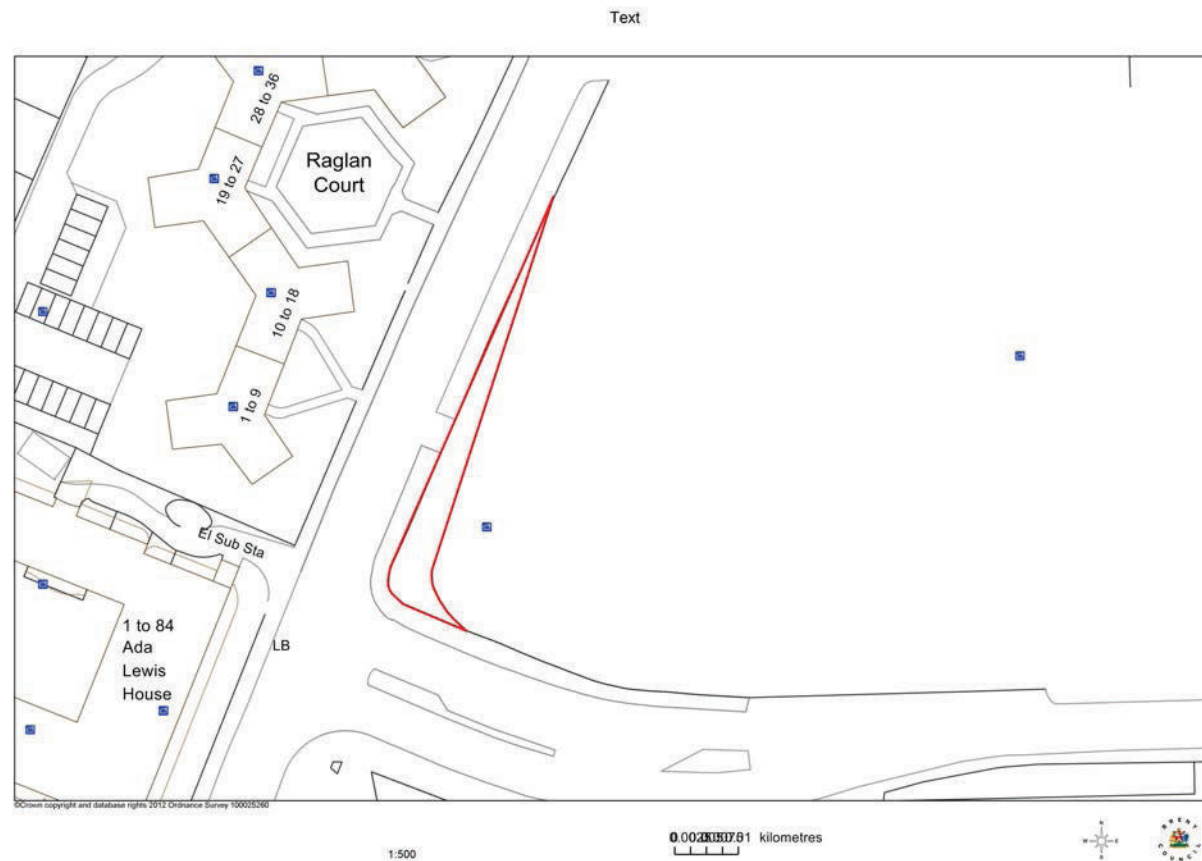
LIST OF ABBREVIATIONS

AAP Area Action Plan	NCR North Circular Road
BREEAM Building Research Establishment Environmental Assessment	NPPF National Planning Policy Framework
CHP Combined Heat & Power	LPA Local Planning Authority
CL Community Infrastructure Levy	S106 Section 106
CO2 Carbon Dioxide	SIL Strategic Industrial Location
DPD Development Plan Document	SPD Supplementary Planning Document
EA Environment Agency	SPG Supplementary Planning Guidance
FRA Flood Risk Assessment	SSA Site Specific Allocation
GLA Greater London Authority	SUDS Sustainable Urban Drainage System
GTANA London Boroughs Gypsy & Traveller Accommodation Needs Assessment	UDP Unitary Development Plan

LDA London Development Agency	WFD Water Framework Directive
LDF Local Development Framework	

Appendix C: Land Take Maps 20

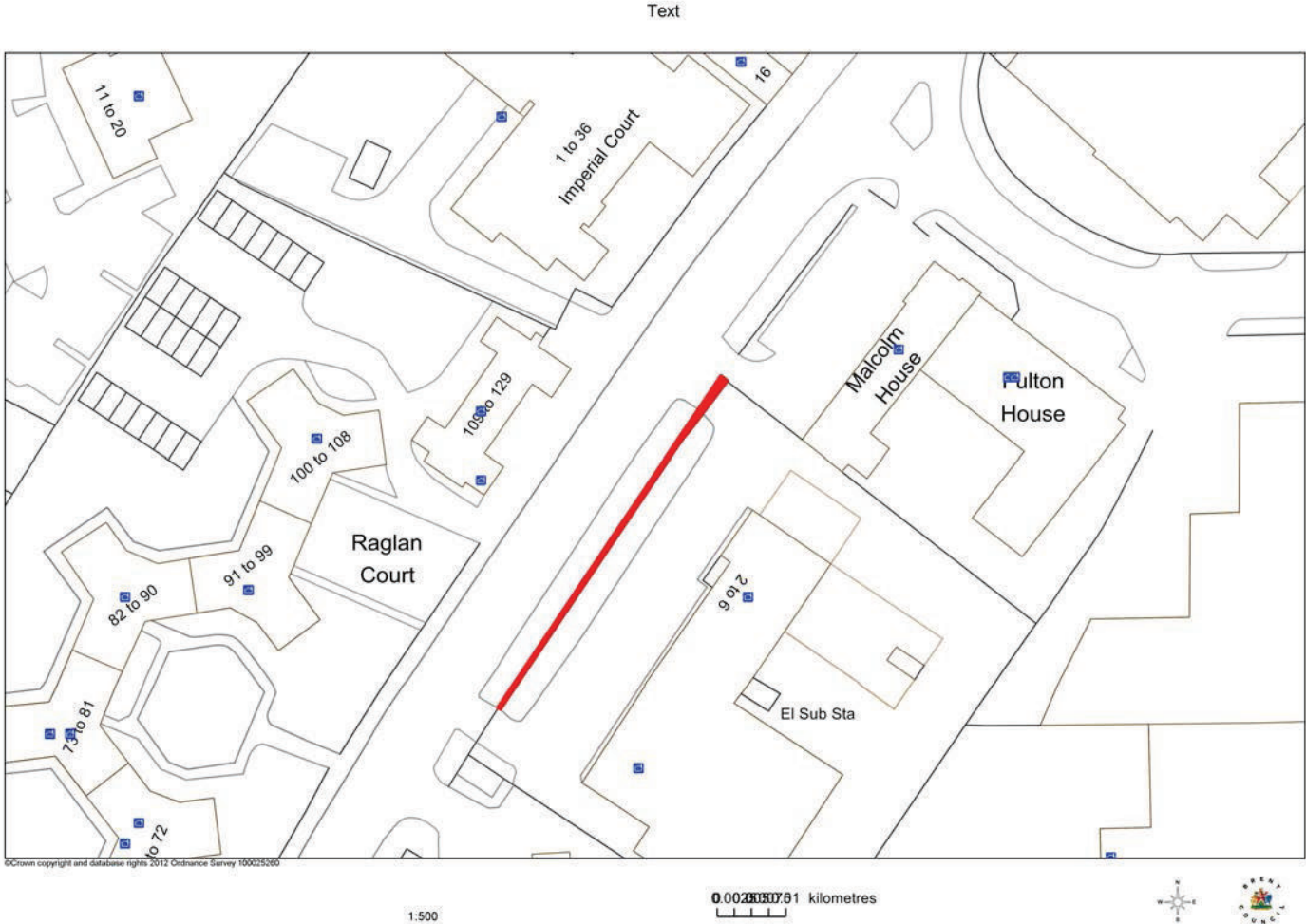
20.1 The following are maps detailing the land take requirements for highway and junction improvements which form integral parts of the longer term transport strategy for Wembley, which is required to facilitate development and regeneration within the action plan area. Certain land requirements are already being progressed, whilst others will be required on re-development of the sites. The specific details of the land required for transport improvements associated with each site are described in chapters 12-15. Map 20.1 shows the land required for the junction improvement at Empire Way / Engineers Way, which affects Site W12 (North West Lands).



Map 20.1 Land take required from W12

20 Appendix C: Land Take Maps

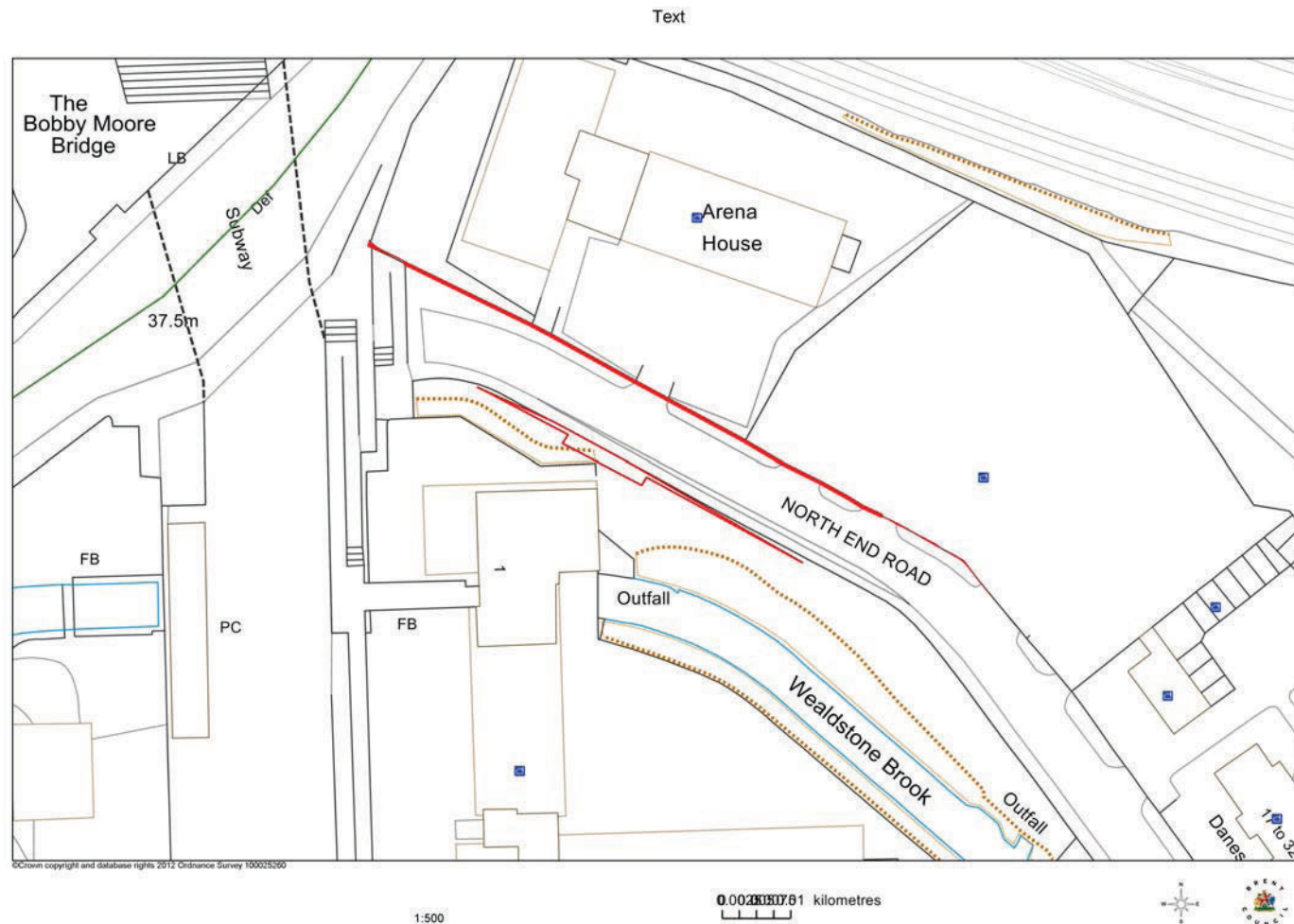
20.2 Map 20.2 shows land required to provide the widened pedestrian footway which affects Site W10 at Dexion House.



Map 20.2 Land take required at W10

Appendix C: Land Take Maps 20

20.3 Map 20.3 shows the land take required for improvements to North End Road as they affect Arena House (W14) and 1 Olympic Way (W16).

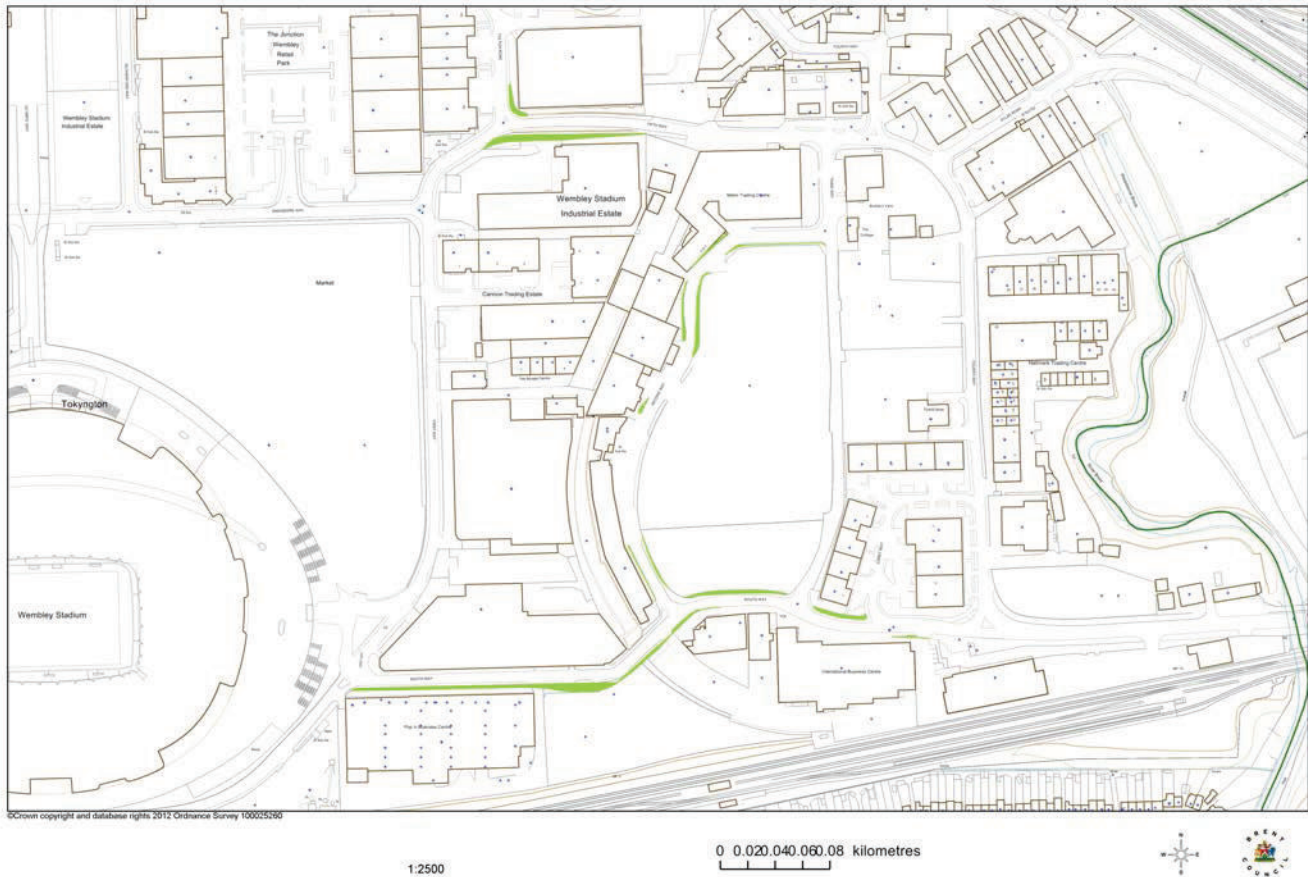


Map 20.3 Land take required at W14 and W16

20 Appendix C: Land Take Maps

20.4 Map 20.4 shows the land required to support a package of improvements within the eastern lands area of Wembley. These affect sites W27 (Euro Car Parts), W28 (First Way) and W29 (Second Way). This map shows alternative options, so that if development come forward in this location, then some flexibility if built in to providing the transport improvements.

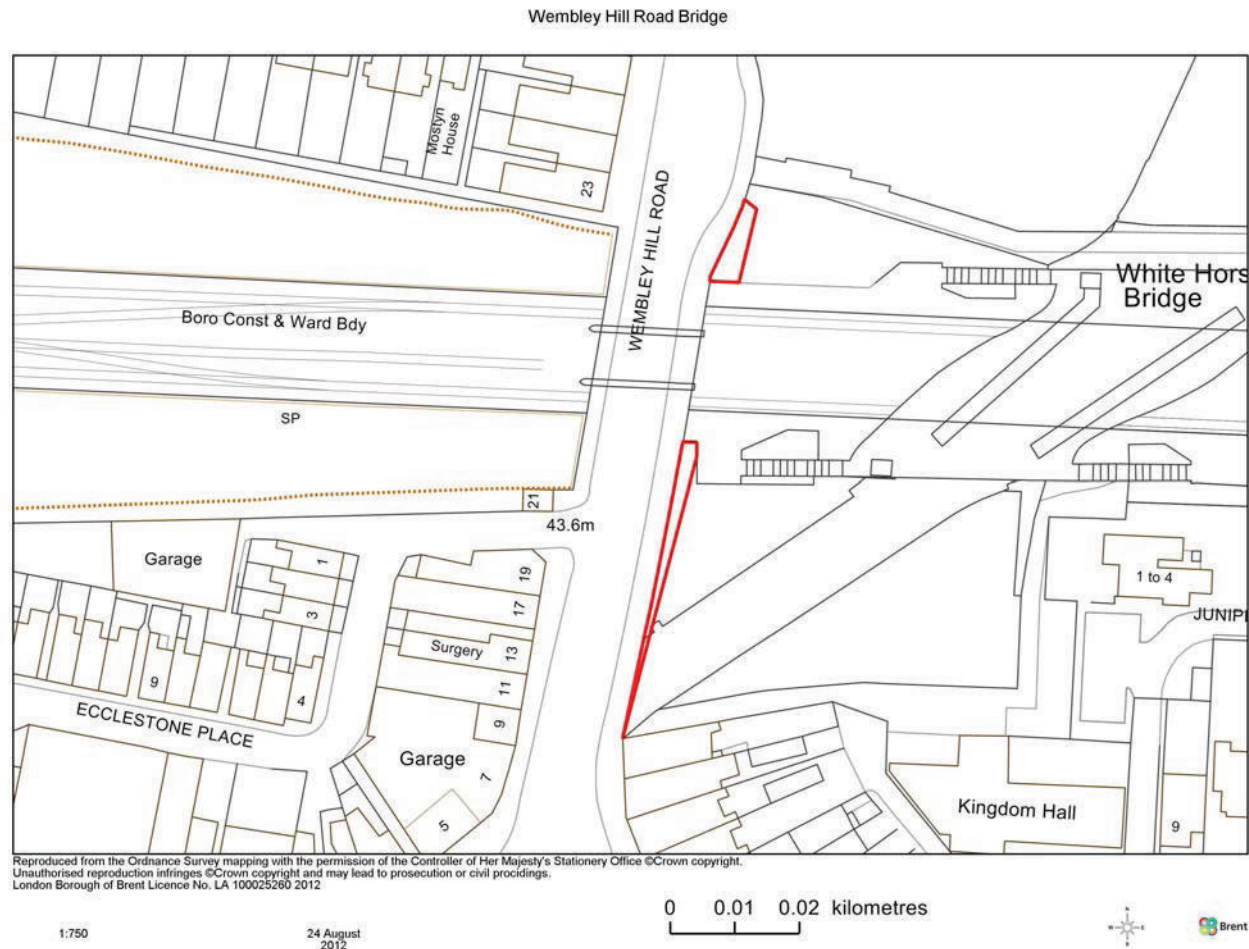
Text



Map 20.4 Land take required from W27, W28 and W29

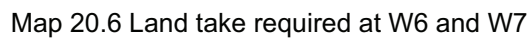
Appendix C: Land Take Maps 20

20.5 Map 20.5 shows the land required to support highway improvements on Wembley Hill Road, particularly the widening of Wembley Hill Bridge, as it affects Site W6 (South Way site adjacent to Wembley Stadium Station).



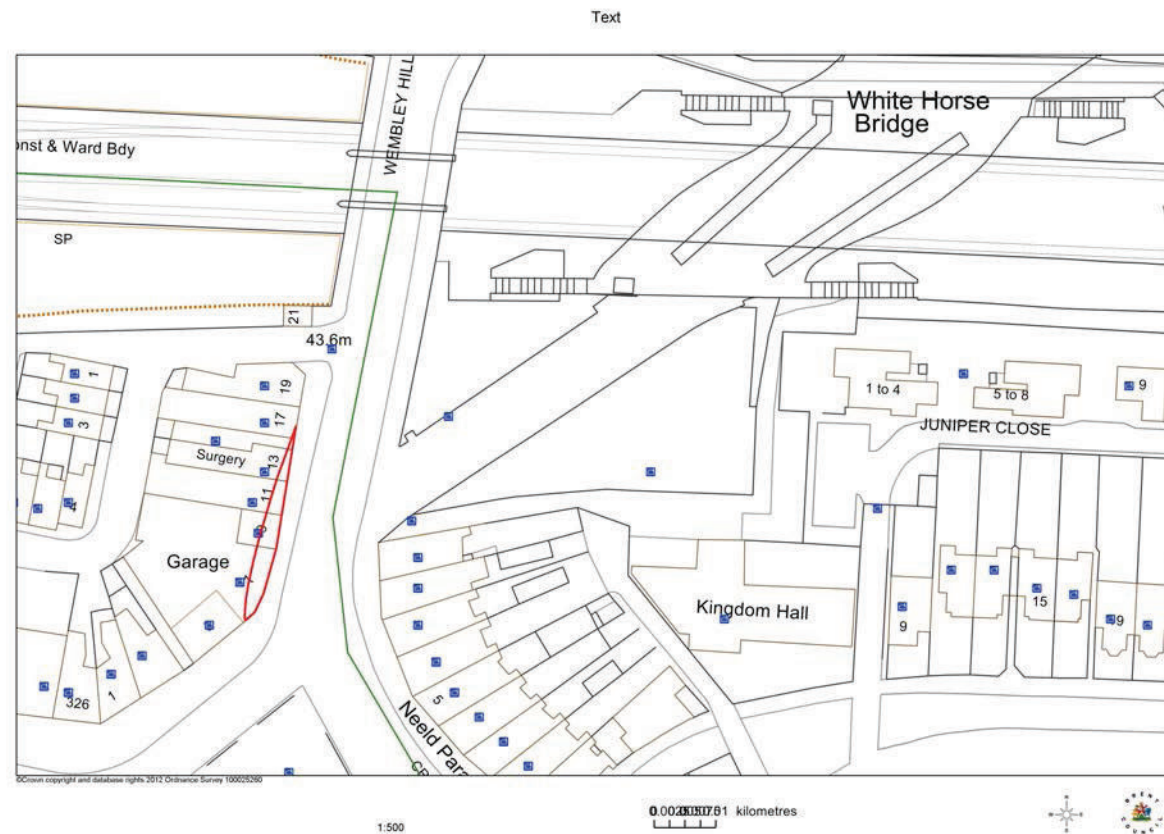
Map 20.5 Land take required at W6

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Appendix C: Land Take Maps 20

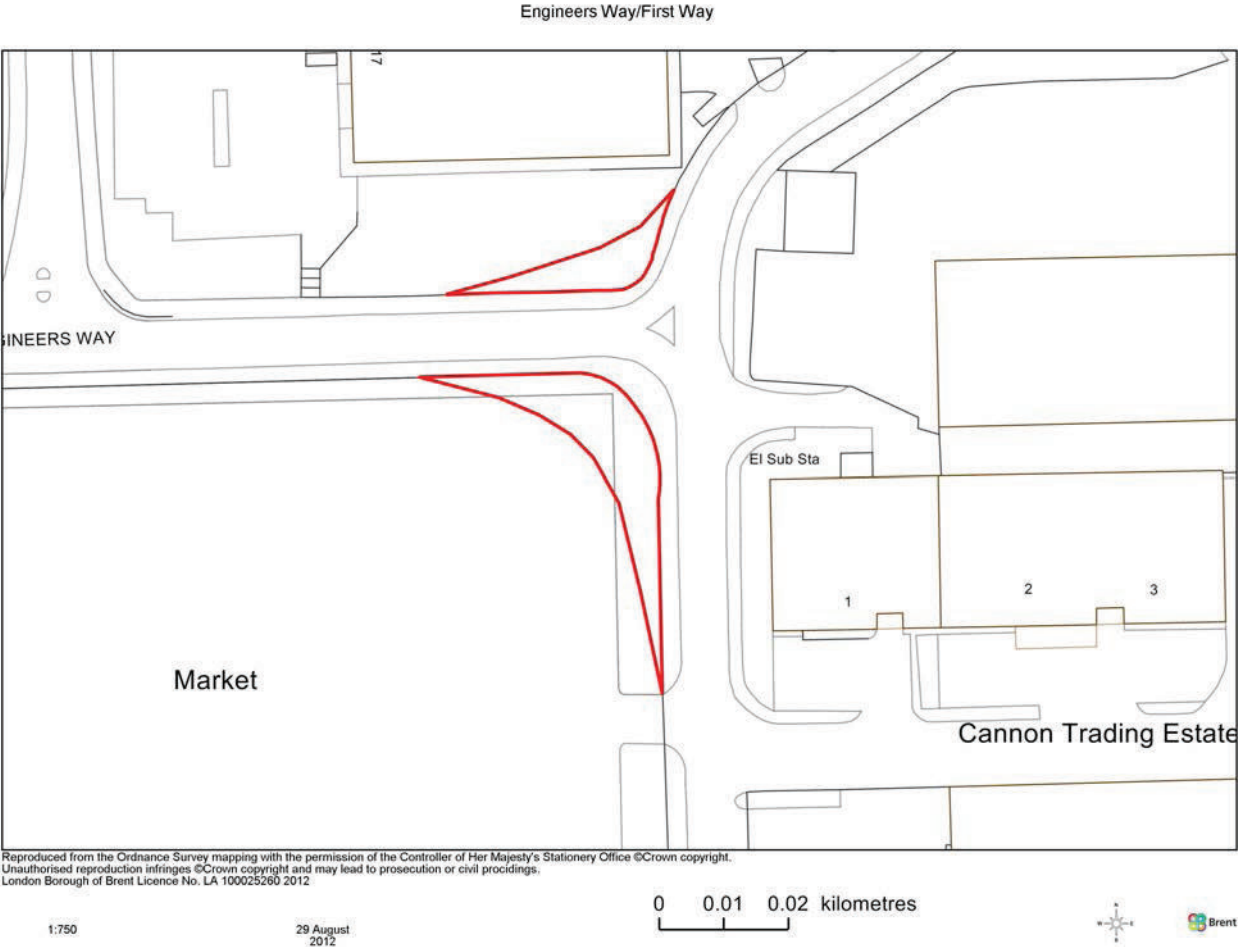
20.7 Map 20.7 below shows land required to support longer term improvements on Wembley Hill Road to provide additional capacity through Wembley Triangle junction, as this will affect Site W4 (High Road / Chiltern Line Cutting South). In the longer term, if there was comprehensive re-development on this site we would look to use this small portion of land (shown in red). This would be used to facilitate additional junction improvements beyond those already identified for the Wembley Triangle as part of existing permissions.



Map 20.7 Land take required at W4

20 Appendix C: Land Take Maps

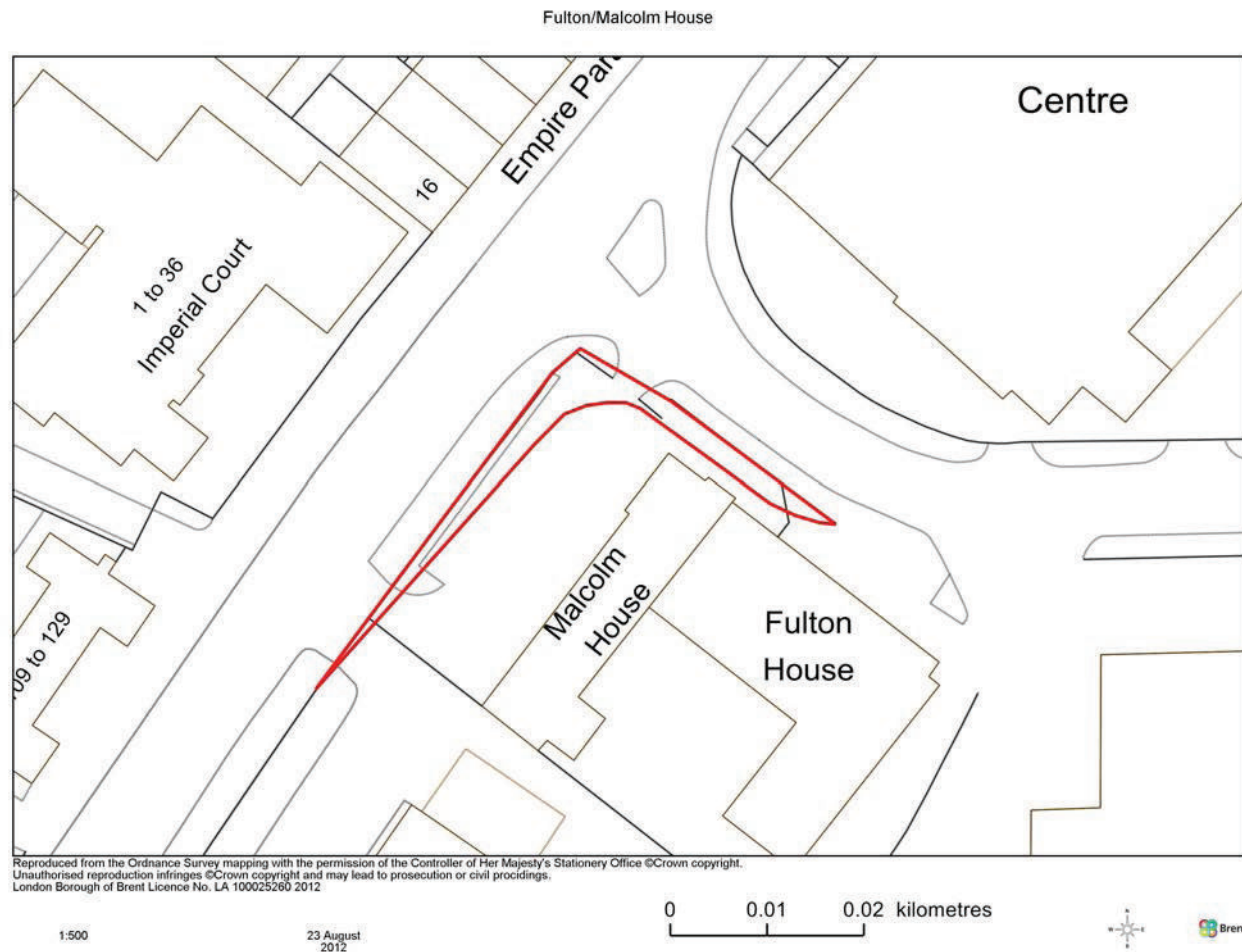
20.8 Map 20.8 below shows land required for junction improvements at Engineers Way/First Way on redevelopment of sites W 18 and W 19.



Map 20.8 Land take required at W18 and W19

Appendix C: Land Take Maps 20

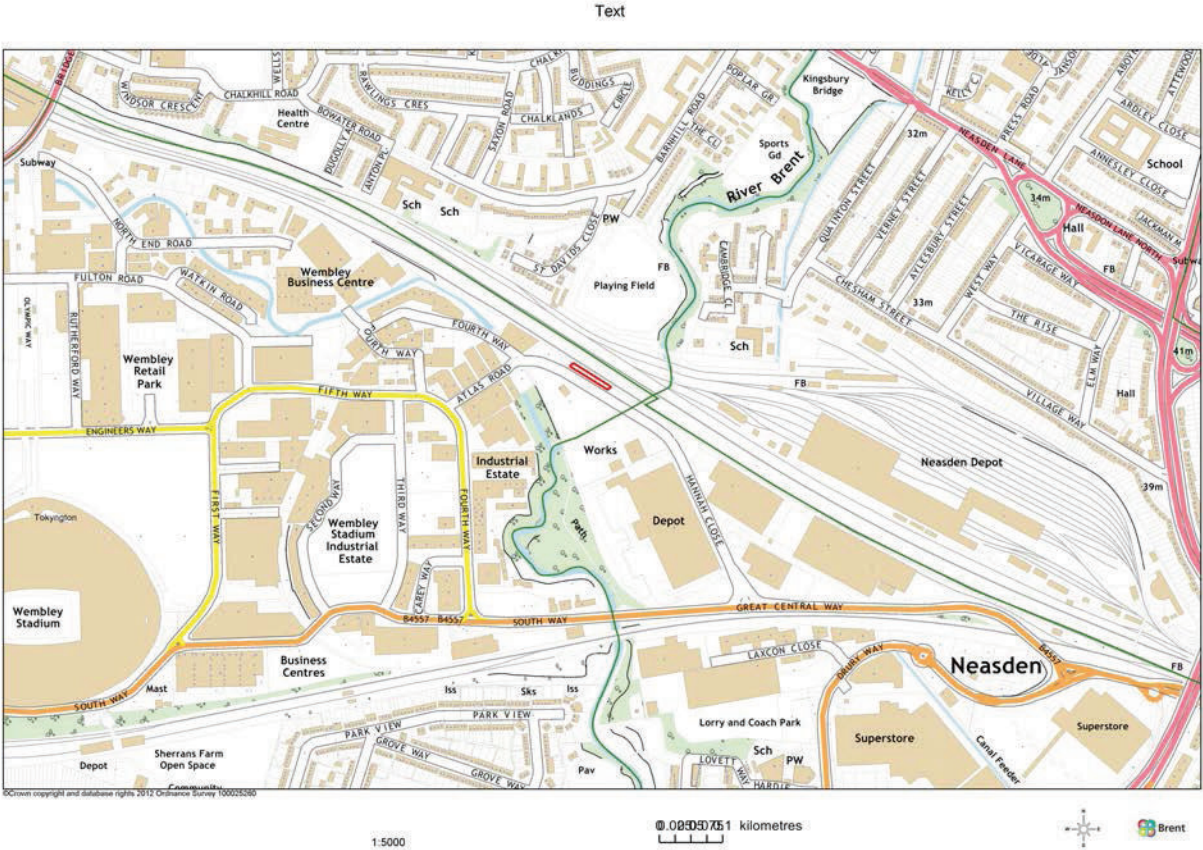
20.9 The map below shows the land take required at Malcolm/Fulton House, as this will affect site W11.



Map 20.9 Land Take Required at W11

20 Appendix C: Land Take Maps

20.10 Map 20.8 below is different from the maps shown above as it details the land take required for a pedestrian and cycle bridge crossing the railway lines (Underground and Chiltern) near St. David's Close, which will provide improved accessibility into the Wembley Area Action Plan area. Although this improvement does not affect a specific site, this land will be required as part of the Wembley Area Action Plan Transport Strategy.



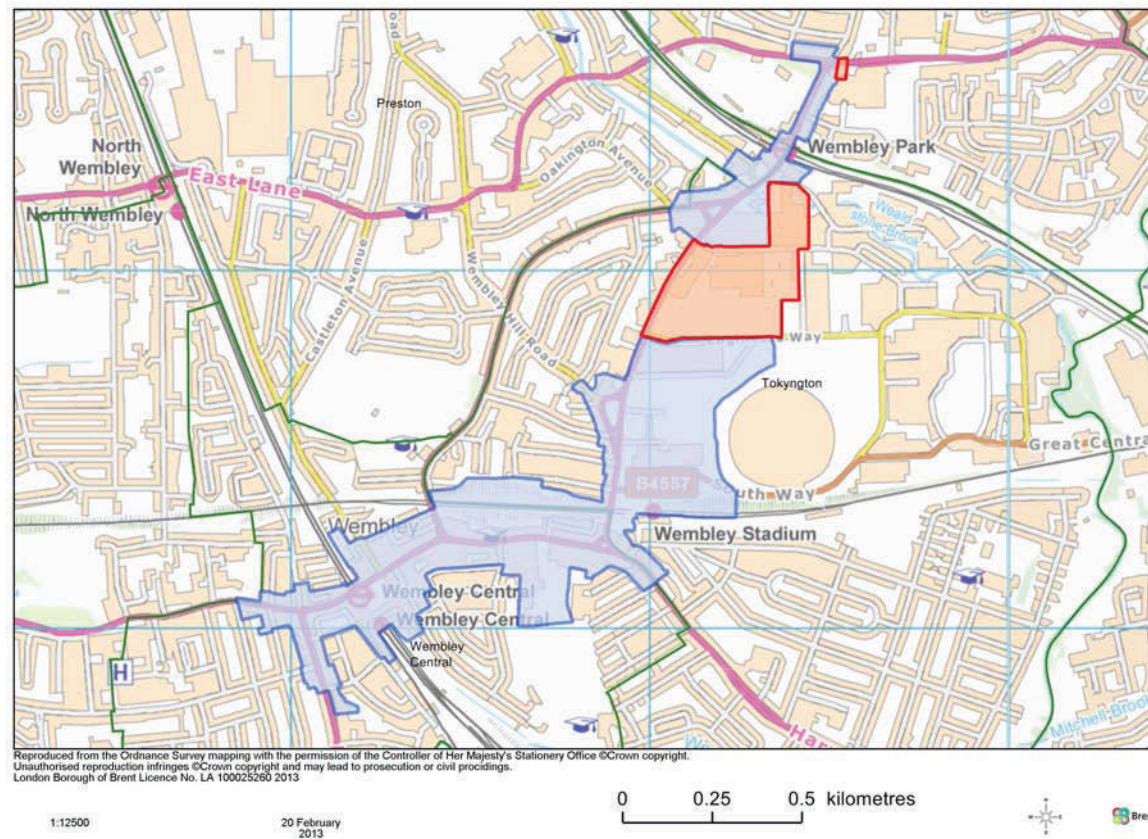
Map 20.10 Land take required at Fourth Way (East) Metropolitan Line

Changes to Proposals Map 21

21.1 The following maps show the detailed changes to the Proposals Map as a result of the Wembley Area Action plan. These include the town

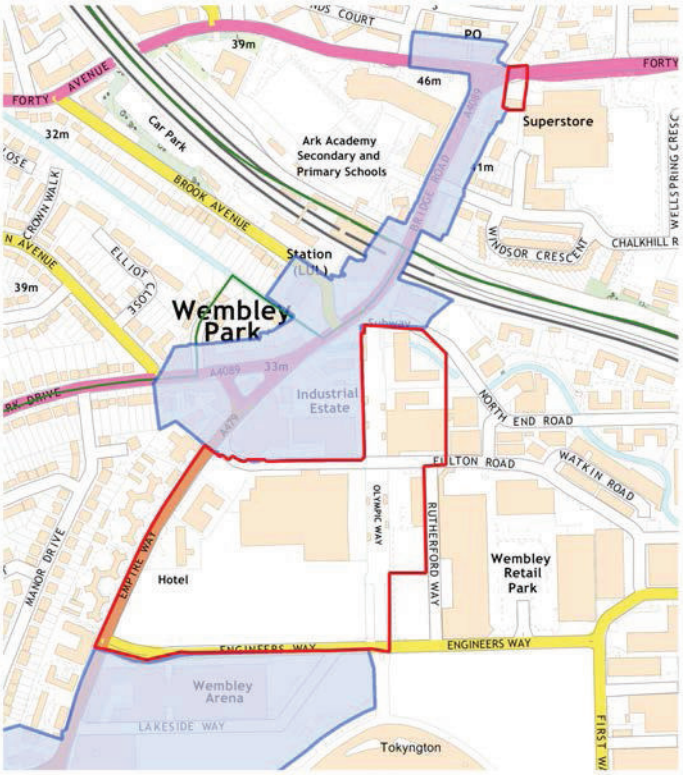
centre boundary extension which combines Wembley and Wembley Park into one town centre, release of two sites from the Strategic Industrial

Land (SIL), and the SIL area proposed for change from Preferred Industrial Land to Industrial Business Park.



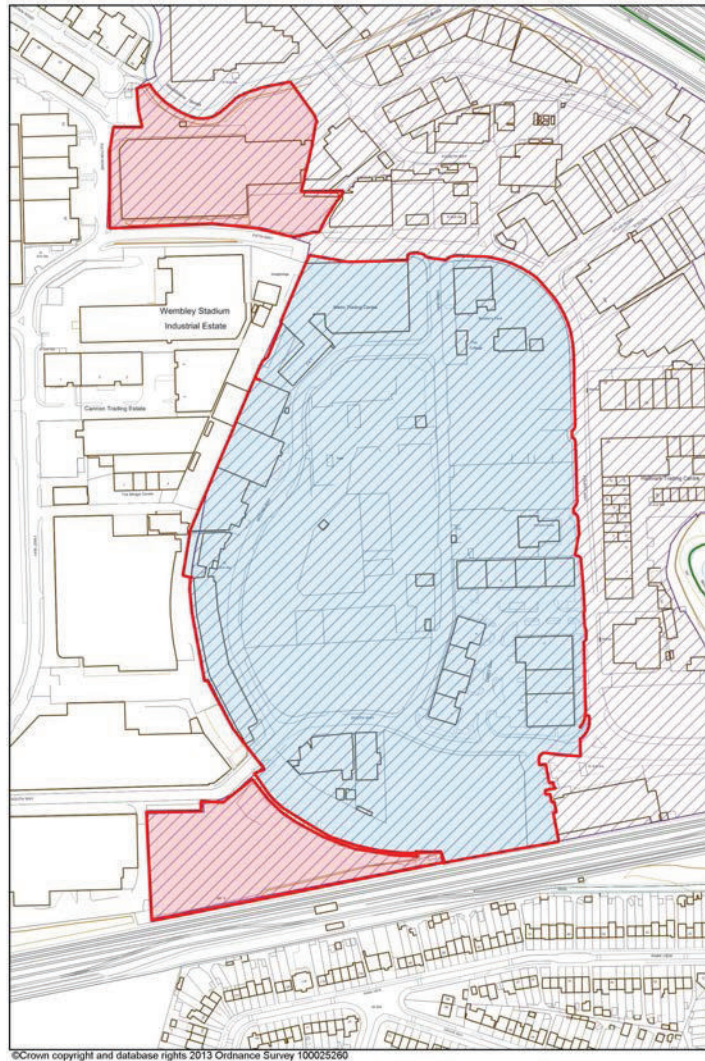
Map 21.1 Changes to Wembley Town Centre Boundary (additions in red)

21 Changes to Proposals Map



Map 21.2 Changes to Wembley Town Centre (Detail)

Changes to Proposals Map 21



Picture 21.1 Land for release from Strategic Industrial Land (SIL) and SIL area proposed for redesignation from Preferred Industrial Land (PIL) to Industrial Business Park (IBP)

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