



**Executive**  
14 March 2011

## **Report from the Director of Regeneration and Major Projects**

Wards affected:  
Wembley Central, Tokyngton

### **Wembley Link – Adoption of Supplementary Planning Document**

#### **1.0 Summary**

- 1.1 This report asks the Executive to consider the consultation responses to the draft Wembley Link Supplementary Planning Document (SPD) and proposed changes to the consultation draft. Executive is asked to adopt the Wembley Link as supplementary to the council's 2010 Core Strategy and 2011 Site Specific Allocations.

#### **2.0 Recommendations**

- 2.1 That Executive notes the views expressed on the council's consultation draft of the Wembley Link SPD and supports the responses and changes proposed as a result, set out in Appendix 1.
- 2.2 That Executive agrees to adopt the Wembley Link as a SPD supplementary to the council's 2010 Core Strategy and Site Specific Allocations subject to the Council's adoption to the DPD.
- 2.2 That Executive delegates authority to the Director of Regeneration and Major Projects to make minor text changes and illustration changes to the published document.

#### **3.0 Detail**

##### **Introduction**

- 3.1 Supplementary Planning Documents are intended to provide more detailed planning guidance. They are not intended to introduce new policy but expand on existing policy and they must supplement an adopted planning document such as the Core Strategy or an extant policy in the Unitary Development Plan. The Wembley Link SPD provides the detailed proposals that flow from the council's Local Development Framework Core Strategy, notably policies CP1, CP2, CP4, CP7 and CP16. The Core Strategy

was adopted by the council in July 2010 and sets out the spatial strategy for the whole borough. The LDF will eventually replace the former borough plan, the Unitary Development Plan (UDP) adopted in 2004. The site specific allocations (SSA) development plan document (DPD) allocates sites for specific land uses and sets out policies to guide their development. Site Allocations W10, W7, W8 and W9 are located in the Wembley Link area.

- 3.2 The Wembley Link SPD refers to the stretch of Wembley High Road from Wembley Triangle to Chesterfield House (at the corner of High Road and Park Lane). It provides a link between the new retail proposals approved and proposed in the Stadium area and the main shopping core around Wembley Central station. The LDF Core Strategy sets out a strategy to promote the expansion of the town centre eastwards towards the Stadium and this requires an improved retail presence in the Wembley Link. This SPD provides the detail to achieve the LDF Core Strategy.
- 3.3 As well as this Core Strategy imperative, there are other good reasons to promote development in the Wembley Link. The Wembley Link is made up of an incoherent patchwork of 1960's to 1980's office blocks that were built on existing two-three storey turn of the century and 1930's development. Many of these office blocks are no longer suited to modern needs and have significant amounts of vacancy. There is an opportunity to provide new residential development as part of the mix of development proposed in the SPD and thereby help meet the housing targets set out in the LDF Core Strategy. A number of design studies and market tests have been carried out on this area and a specific site boundary has recently been established for a zone that would form the key anchor to kick-starting regeneration.
- 3.4 The Wembley Link includes land on both sides of the Wembley High Road including the Brent House and Copland school sites on the south side. Copland School is badly in need of redevelopment and in order to facilitate bringing this forward, it is essential to provide clear guidance about acceptable land uses and development details such as building heights and access arrangements.
- 3.5 The Wembley area has a mix of different guidance and proposals applied to it. This includes policies and Site Specific Proposals in the 2004 UDP, draft Site Specific Allocations in the council's 2010 Development Plan Document and SPD in the form of the Wembley Masterplan (covering the Stadium Area). The intention ultimately is to consolidate the main planning policies and proposals in an Area Action Plan. This will be a Development Plan Document and will need to go through an Examination in Public. Although a DPD has more weight than an SPD, it takes considerably longer to adopt, usually at least a year. It is proposed to complete the Wembley Link document as a SPD in order to maximise the opportunities arising from current developer interest in some of the Wembley Link sites, particularly Brent House and Copland School. There will still be a need for this more detailed guidance, when the AAP is adopted.

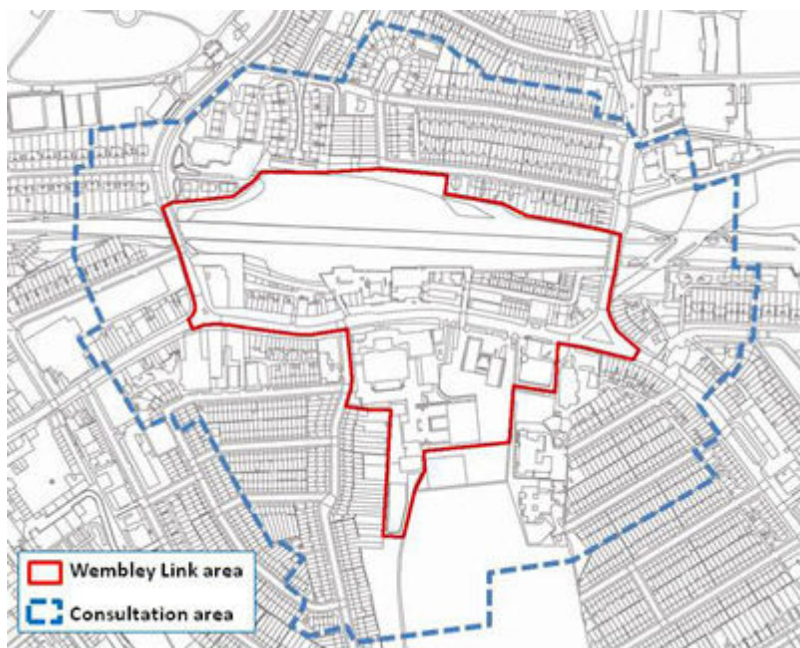
### **Key Features of the Missing Link SPD**

- 3.6 The Key points of the SPD are to:
  - Encourage new development along the Wembley Link that has retail and other town centre uses on the ground floor

- Retain some office floor space but allow for residential uses over the ground floor retail
- Bring forward good servicing arrangements for new shops while, limiting car parking for residential development and securing improvements to key junctions and bridges
- Limit development to between 4 and 8 storeys generally, except for key locations at either end of the study area.
- Show proposals with and without the Network Rail embankment on the north side of the High Road
- Limit development on the north side of the railway
- Promote a foodstore on the Brent House site that enables the redevelopment of Copland School to the rear
- Encourage family housing wherever possible.

## Consultation Process

3.7 Planning Committee approved the draft SPD for consultation on 20 October 2010 and public consultation took place from 1<sup>st</sup> November to 17<sup>th</sup> December. Officers carried out two evening public meetings (at Copland school and at Patidar House) and presented at the Wembley Area Consultation Forum. 22 consultees responded to the draft SPD making 88 comments. These are set out in more detail in Appendix 1 and they contain comments from respondents and the council's proposed response, including proposed changes to the SPD as a result.



## Summary of Key Responses

### Height restriction imposed on Chesterfield House

3.8 The landowner of Chesterfield House is concerned that an arbitrary height limit on tall buildings is proposed in the SPD where there is no justification and that it will affect viability. Response: The heights set out in the SPD give an indication of the level of development that will be appropriate based on thorough analysis conducted by the Council and the relationship between the Central Square tower and the rest of the area in a suburban setting. Your Officers recognise that members of the public have

expressed strong concerns over building heights in the Chesterfield House and Copland Village applications and recognise the suburban context of the area when providing comfortable living environments.

#### Adoption schedule in relation to the Site Specific Allocations

- 3.9 The adoption schedule included in the draft SPD implies the Wembley Link SPD will be adopted prior to the Council adopting the Site Specific Allocations DPD. Response: Members are asked to agree to adopt the Wembley Link supplementary to both the council's 2010 Core Strategy and Site Specific Allocations DPD, subject to the Council's adoption to the DPD in Spring 2011.

#### Proposals on Chiltern Railway embankment (Mostyn Ave side)

- 3.10 Some residents are concerned about the potential loss of open space and wildlife area on the embankment. They are worried that any development on the embankment will make the ground unstable. On the contrary, the developer on behalf of Network Rail is against the SPD proposal for only a very limited amount of new development on land the embankment. Response: An objective is now included in the SPD to minimise the impact of development on the nature conservation area where measures to mitigate impact on nature conservation could include improved access to open space for the local community. The SSA supports higher density development including residential along the south side and is clear that only a limited amount of residential development may be considered on the north side.

#### Other junction improvements should be included

- 3.11 Some residents suggest there should be plans to improve the Elm Road/Park Lane Junction as the road is gridlocked along Park Lane most of the day. Response: The proposed Wembley Area Action Plan covering the whole Wembley Regeneration Area will be produced in 2011/2012. Comprehensive transportation improvements for the whole area will be considered.

### **Conclusions**

- 3.12 The Wembley Link requires urgent action, none more so than at Copland School. The SPD attempts to bring forward guidance that encourages regenerative development at an appropriate scale. It provides options so that guidance can respond to market changes and flexibly adapt to different market conditions. Although an Area Action Plan for Wembley is to be completed next year, it is important that, in addition, there is more detailed guidance on design, the scale of development, layout, etc. It is also important that this guidance is in place early to help bring forward the regeneration of Wembley and support the overall growth strategy.

### **4.0 Financial Implications**

- 4.1 There is an existing budget to cover the production of the final document.
- 4.2 The intention of producing the Wembley Link SPD is to promote regeneration both in the town centre, and assist in the regeneration of wider Wembley City and provide a means of addressing the urgent need of redeveloping and improving Copland School.

- 4.3 The Wembley Link SPD is designed to establish a framework for determining application(s) for all of the sites within the SPD area. The assessment of planning applications will be undertaken in the normal way within existing budgets. The Council expects that the published document will improve pre-application understanding and negotiations with developers and contribute to improved application processing times.
- 4.4 The adopted SPD will clarify the Council's expectations upon developers for their contribution to infrastructure. The clearer expectations will provide clarity and certainty for developers proposing schemes for the area.
- 4.5 The realisation of the Wembley Link will require partnership and coordination and it is hoped that the future regeneration of the area can be secured through cooperation. However, the Council may need to use its powers under the Planning and Compulsory Purchase Act 2004, to acquire elements of land that are preventing the delivery of the Wembley Link and the associated community benefits. Such powers will be used where third parties meet the costs of such CPO activity

## **5.0 Legal Implications**

- 5.1 The preparation of the SPD is governed by Part 5 of the Town and Country Planning (Local Development)(England) Regulations 2004 which sets out the consultation procedures which must be carried out before its adoption. The SPD cannot be adopted until any representations made as a result of the consultation have been considered by the Executive. The Wembley Link SPD is in conformity with the policies in the adopted Core Strategy and the Site Specific Allocations DPD which is scheduled for adoption in Spring 2011. The SPD will be a material consideration for development control purposes
- 5.2 Any of the Council-led infrastructure proposals will have to go through the appropriate Council procedures e.g. obtaining approvals from the Planning Committee and the Executive if required.

## **6.0 Diversity Implications**

- 6.1 Full statutory public consultation has been carried out in preparing the draft SPD as shown in Appendix 1. An Equalities Impact Assessment of the Core Strategy 2010 has also been carried out.
- 6.2 The SPD provides a development framework in one of the most diverse communities in London. The regeneration of the area is set to embrace and celebrate this diversity through the securing of a range of facilities for the community to meet the needs of its diverse ethnic, cultural and religious groups. It also tries to create a broad base of employment opportunities for different sectors. The SPD also tries to create an environment which will be accessible to all.

## **7.0 Staffing/Accommodation Implications**

- 7.1 The SPD allows for future uses of Brent House when the council vacates it for the new civic Centre. The SPD does not compel a change in use but encourages regenerative investment in the site should the council wish to dispose of the site.

## **8.0 Environmental Implications**

8.1 The Wembley Link SPD sets out proposals to regenerate the eastern end of the town centre based on sustainable principles.

## **9.0 Background Papers**

- London Borough of Brent LDF – Local Development Scheme, 2010
- Brent UDP, 2004
- Brent Core Strategy, July 2010
- Site Specific Allocations Submission Draft, June 2010
- Planning Committee Report, 20 October 2010
- Brent Sustainable Energy Infrastructure-Wembley Feasibility Study, Arup 2008
- Brent Heat Mapping Study, May 2009
- The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008
- Consultation draft, Wembley Link SPD, October 2010

### **Contact Officers**

Any person wishing to inspect the above papers should contact Dave Carroll, Planning Service 020 8937 5202

**Andy Donald**  
**Director of Regeneration & Major Projects**

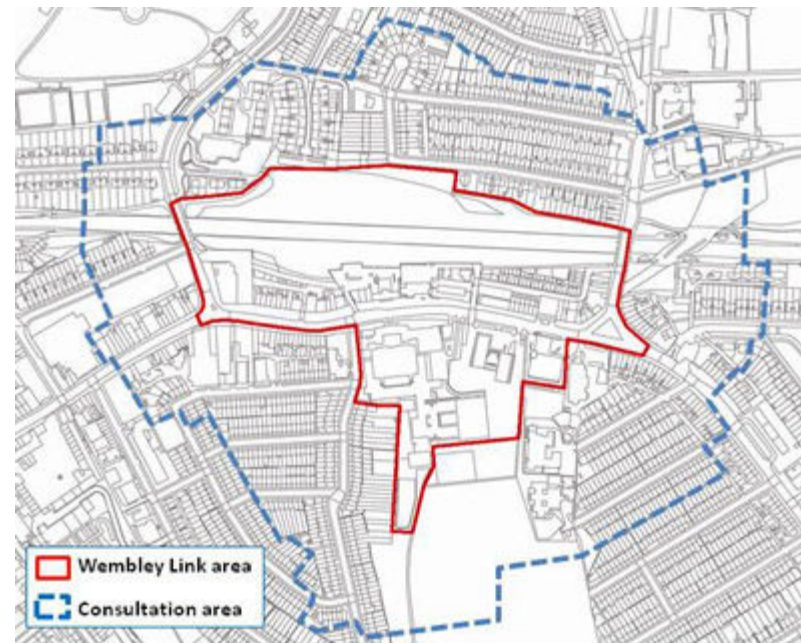


## Appendix 1

## Wembley Link Supplementary Planning Document

### Consultation Statement & Summary of Responses

- 1 On 20 October 2010, Brent Planning Committee ([www.democracy.brent.gov.uk/mgConvert2PDF.aspx?ID=1313&T=1](http://www.democracy.brent.gov.uk/mgConvert2PDF.aspx?ID=1313&T=1)) approved a public consultation on the emerging new Supplementary Planning Document.
- 2 Public consultation commenced on 1 November 2010 ended on 17 December 2010
- 3 Notification of the consultation was delivered by hand to 1,100 addresses which are within 100metres of the Wembley Link Area.
- 4 Consultation letters were posted to
  - 48 freeholders/leaseholders who do not live/occupy the premises within the SPD area.
  - 6 Tokyngton Ward and Wembley Central Ward Councillors
  - GLA Assembly Member.
- 5 Consultation letters emailed to 18 statutory consultees and major stakeholders.
- 6 The SPD was presented and discussed at the following open Forums
  - 20 October 2010 - Wembley Area Consultative Forum - Presentation to members of the public before consultation commenced to encourage all to attend consultation meeting and exhibition
  - 10 November 2010 - Public exhibition staffed by Brent officers was held at Copland School.
  - 24 November 2010 - Public consultation meeting took place at Patidar House
- 7 The Consultation was publicised in
  - Public notices in local papers – Wembley Observer and Willesden and Brent and Chronicle on 4 November





- Press release at [www.brent.gov.uk/pressreleases.nsf/News/LBB-1458](http://www.brent.gov.uk/pressreleases.nsf/News/LBB-1458) on 8 November 2010
- Wembley Way Newsletter November 2010. Copies of Wembley Way are normally distributed to 38,000 properties in the 7 Wembley wards including Wembley Central and Tokyngton

8 Notices about the consultation tied onto lamp posts inside the area and at the main junctions entering the SPD area

9 Copies of the draft SPD were available to view at:

- Brent Council One Stop Shop, Brent House
- Brent Council One Stop Shop, Town Hall, Forty Lane
- Ealing Road Library
- Tokyngton Library
- Town Hall Library

10 The details of the consultation were available online –

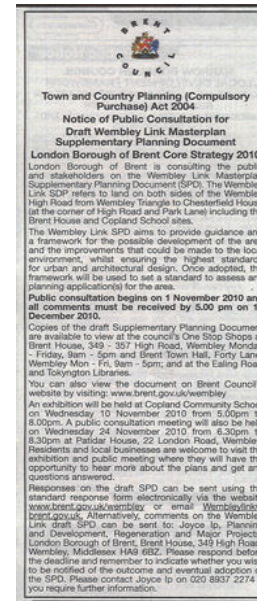
- Brent Consultation Tracker ([www.brent.gov.uk/consultations.nsf](http://www.brent.gov.uk/consultations.nsf))
- Wembley Regeneration homepage ([www.brent.gov.uk/wembley](http://www.brent.gov.uk/wembley))
- Brent Planning Service [www.brent.gov.uk/planning.nsf](http://www.brent.gov.uk/planning.nsf)

11 A special mailbox [wembleylink@brent.gov.uk](mailto:wembleylink@brent.gov.uk) was set up for respondents to email comments or queries regarding the Masterplan.

12 The Council received 22 representations which had been duly considered and the responses and proposed changes had been formulated which are described in detail in Appendix One.

13 The principal comments and concerns including:

- Height restriction imposed on Chesterfield House
- Adoption schedule in relation to the Site Specific Allocations
- Proposals on Chiltern Railway embankment (Mostyn Ave side) – objections to development vs objection to limited development
- Limiting car ownership raised the question of appropriateness for family housing
- Other junction improvements should be included.



- Sustainability should go further

## Wembley Link SPD - representations and the council's proposed responses

January 2011

Ref No.	Representation	Summary of Representation	Council's Response	How SPD has been altered
WL001	Mr. Shane McMahon	<p>a) Opposed to the height of proposed hotel on Chesterfield House site.</p> <p>b) There should be plans to improve the Elm Road/Park Lane Junction as the road is gridlocked along Park Lane most of the day.</p> <p>c) Supports Copland school with a community element</p> <p>d) Objects to more fast food outlets and gambling shops sited in front of Copland.</p> <p>e) Proposes a TFL Cycle Hire Scheme.</p> <p>f) Late night drinking venues should be carefully considered to avoid anti-social problem.</p> <p>g) Consideration should be given to fund extra Police Officers NOT Police Community Support Officers.</p> <p>h) Demands local jobs for local people and grants to attract small business to the area.</p> <p>i) Good CCTV coverage, lighting and active frontages to deter anti Social behaviour.</p> <p>j) Neighbourhood watch area established and funded by developers</p> <p>k) Proposes another fitness centre/gym to the development.</p> <p>l) Avoid conflict of pedestrians and bus passengers at bus stop outside shops</p> <p>m) Developers should contribute to improve Wembley Central Station.</p> <p>n) Demand green area and lots of new trees.</p> <p>o) The development should be a public area.</p> <p>p) Proposes a medical practice and a crèche</p>	<p>a) Objection noted.</p> <p>b) A development plan document, Wembley Area Action Plan covering the whole Wembley Regeneration Area will be produced in 2011/2012. Comprehensive transportation improvements for the whole area will be considered.</p> <p>c) Support noted.</p> <p>d) For new developments in front of the school, Brent will control the types of uses allowed through its planning powers. The Council will apply its normal planning policies to control non-retail uses such as A5 uses (takeaways) and A2 uses (which includes betting shops). However, it should be borne in mind that the Council's powers to control certain uses are limited. For example, a bookmaker who wants to open a new betting shop acquires premises that are already in the same planning Use Class as betting shops (ie A2 - such as banks, estate agents &amp; employment agencies.</p> <p>e) TFL Cycle Hire scheme operates across nine London boroughs covering the central fare zone (Zone 1). It may be rolled out to outer London in the future if demand and finance allow.</p> <p>f) Brent will practise its licensing power to tackle the issue.</p> <p>g) The decision lies with the Borough Commander, Metropolitan Police rather than Brent Council.</p> <p>h) Brent will ensure new jobs in the area will be advertised locally through planning obligations. Large food stores normally provide local employment.</p> <p>i) Secured by Design (a police initiative supporting the principles of 'designing out crime) principles are normally considered when planning applications are assessed.</p> <p>j) The requirement for setting up of a neighbourhood watch area is outside the remit of Planning, especially as there will not be a single developer to cover the</p>	<p>a)-d)No change necessary</p> <p>e) "Cycle hiring scheme" inserted in the Section 106 section.</p> <p>f)-g) No change necessary</p> <p>h) Local employment is emphasised in the text.</p> <p>i)-l) No change necessary.</p> <p>m) Contributions towards local public transport network are normally expected. Text included in the Planning Section 106 section.</p> <p>n) Text included in "Open Space" and 5.4 "Securing the Infrastructure" Sections.</p> <p>o)-p)No change necessary</p>



The Planning Service June 2009

Ref No.	Representation	Summary of Representation	Council's Response	How SPD has been altered
			<p>whole area.</p> <p>k) Brent welcomes mixed use development for the area, so a fitness centre/gym could be proposed alongside with other suitable uses.</p> <p>l) Similarly widths of the pavement currently owned by Brent will remain.</p> <p>m) Contributions towards local public transport network are normally expected.</p> <p>n) Replacement openspace will be provided alongside development as well as new trees being planted.</p> <p>o) Although private courtyards will be created, the majority of the area will be publicly accessible.</p> <p>p) Community facilities such as medical practices and crèches are encouraged to be located in the area. However, the provision of a GP surgery is subject to NHS funding being available.</p>	
WL002	Chad Collins, Chiltern Railways	No objections in principle to what is being proposed.	Noted	No change required
WL003	Debbie Nimblette	Objects to losing the sky and green that remains between her home and the railway tracks	Brent Council understands the concern of local people. Therefore, limited development will be allowed in the Nature Conservation Area subject to nature conservation value assessment being carried out.	See amendment below
WL004	Isabel Assaly, Natural England	<p>a) In principle, does not support development on Sites of Importance for Nature Conservation (SINC)- recommends an additional Planning Objective -that the nature conservation value of the site is protected and enhanced</p> <p>b) Advises to incorporate Natural Play into the SPD by improving the connectivity between parks and openspaces as part of the Wembley Link falls within an Area of Deficiency in Access to Nature.</p> <p>c) With regards to landscaping proposals, advises the council to consult Brent's Biodiversity Action Plan, The London BAP Habitat Suitability maps and The London Regional Landscape Framework for a steer on ecological soft landscaping enhancements</p> <p><u>Sustainability</u></p> <p>d) Advises the council to incorporate Green infrastructure such as parks, gardens, allotments,</p>	<p>a) Brent understands Natural England's concern. The Chiltern Line Cutting site has long been recognised as a potential development site which can contribute to much needed regeneration of the town centres well as contributing towards improved pedestrian access to the Stadium. It is recognised as a potential development site in the adopted Core Strategy as well as Site Specific allocations Development Plan Document (DPD).</p> <p>b) - d) Advice noted.</p>	<p>a) Note added to Planning Objectives section (p7) - a new objective in included</p> <p>b) Note added to Open Spaces section</p> <p>c) Note added to open spaces section</p> <p>d) Note added to 4.5 Environmental Sustainability section.</p>

Ref No.	Representation	Summary of Representation	Council's Response	How SPD has been altered
		cemeteries, trees, green roofs and natural habitats into proposed development to improve site resilience to climate change and the urban heat island effect.		
WL005	Dyar Lally, Hallmark Property Group	<p><u>Section 5, Page 20</u></p> <p>a) Objects to an arbitrary height limit on tall buildings especially there is a developer willing to deliver a new hotel with new jobs and shopping and business space. The Chesterfield House Site office block consent (part 11, part 17 storeys, max height 83m) is still live. The SPD should not place new obstacles in front of those who are best placed to implement development proposals. Agrees that tall buildings are needed to mark the beginning and end of the Wembley Link.</p> <p>b) There is no justification as why focal buildings should not be higher than buildings in Central square which is distinct from the gateway role of Chesterfield House. It will make any scheme unviable in the present fragile economic climate.</p> <p>c) Brent Core Strategy identifies Wembley Growth Area as a location for tall buildings and suitable for buildings over 30m high and primary location for new hotels.</p> <p><u>Page 32</u></p> <p>d) Requests for the removal of the words “bulkier building” as the designs of the consented office building and the proposed hotel application are different.</p>	<p>a) - b) The heights set out in the SPD give an indication of the level of development that will be appropriate based on thorough analysis conducted by the Council and the relationship between the Central Square tower and the rest of the area in a suburban setting. Brent recognises that members of the public have expressed strong concerns over building heights in the Chesterfield House and Copland Village applications and recognises the suburban context of the area when providing comfortable living environments.</p> <p>c) Tall buildings are acceptable in the Wembley Growth Area. However, as para 4.39 of Brent Core Strategy states, it is only the Wembley Masterplan area (covered the Stadium area not Wembley Link area), which identifies suitable locations for buildings over 30m. The Wembley Link SPD is now providing guidance on the height of buildings appropriate in the area it covers. Brent welcomes hotel development in the area it providing it meets planning requirements.</p> <p>d) Request acknowledged</p>	<p>a) - b) Justification notes and images added to support the council's review of approach to very tall buildings.</p> <p>d) Text amended.</p>

Ref No.	Representation	Summary of Representation	Council's Response	How SPD has been altered
WL006	Carmelle Bell Thames Water Utilities Ltd	<p><u>Paragraph 5 on page 25</u> The wording of paragraph 5 should be revised to read as follows: “All new development must fully consider water and wastewater infrastructure capacity both on and off site in order to avoid any potential problems for existing or new users. <b>Developers will be required to demonstrate that adequate capacity exists and</b> in some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water and sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the statutory undertaker, then the developer needs to contact the statutory undertaker to agree what improvements are required, <b>how</b> they will be funded <b>and when they will be provided. Any upgrades required will need to be delivered</b> prior to the occupation of development.”</p>	The Council acknowledges and agrees with the proposed amendments	Wording amended in 4.5 Environmental Sustainability Section as suggested
WL007	David Maddox on behalf of Solum Regeneration	<p>a) The SPD does not comply with regulation 13(8) of the Town and Country Planning (Local Development)(England) Regulations 2004 (the Regulations) in that it is not in conformity with the adopted Core Strategy (CS) states that an SPD must be in conformity with the policies in an adopted CS and the policies in any other development plan document. The adopted CS identifies the Wembley Chiltern Embankments site as a development site on the Wembley Growth Area Key Diagram (Picture 4.2, page 33)</p> <p>b) No assessment of the nature conservation value of the embankments has been undertaken as required by the draft Site Specific Allocations (SSA) Submission 2010 and consequently the proposed departure from the SSA indicative development capacity for the site is not justified. As a result, the SPD is contrary to regulation 13(8) of the Regulations in that it is not in conformity with the SSA. Policy W10 of the SSA states that town</p>	<p>a) The SPD supports Wembley Chiltern embankments as a development site but, as the objective is to regenerate Wembley Town Centre, the southern embankment is favoured as it is adjacent to the High Road.</p> <p>b) Assessments will be required of the nature conservation status of any sites where a planning application may have an impact. The SSA supports higher density development including residential along the south side and is clear that only a limited amount of residential development may be considered on the north side. The number of units refer to the sum of both embankments, and are merely an indicative figures as explained in</p>	a) & b) The planning objectives (p7) have been amended to clarify the council's position.

Ref No.	Representation	Summary of Representation	Council's Response	How SPD has been altered
		<p>centre uses shall be sought on the site to the south of the railway line and residential development shall be sought on the site to the north of the railway line. Policy W10 also states that the indicative development capacity of the residential part of the site is 390 units between 2017 and 2022. The reasoned justification states that development should, inter alia, be subject to an assessment of the nature conservation value of the embankments. Despite SSA policy, the SPD proposes only a very limited amount of new development on land to the north of the railway line without any evidence of an assessment of the nature conservation value of the site being undertaken. As a consequence, the SPD is contrary to the SSA because it does not justify the departure from policy W10, which allocates the land to the north of the railway line for 390 residential units.</p> <p><b>Proposed Changes</b>  c) To ensure legal compliance with the Regulations  d) The Council should undertake an assessment of the nature conservation value of the site that will form an SPD document for the purposes of the Regulations to enable public participation on it along with a revised SPD.</p>	<p>paragraph 1.13 of the SSA DPD. The illustrative diagram is described as “one possible solution”.</p> <p>c) Brent Council considers it has complied with the regulations as explained above.  d) Please see b)</p>	<p>c) No change is necessary  d) Please see b)</p>
WL008	Fabi Marini	<p>Opposed to any development on Chiltern Railway embankment (Mostyn Ave side).  a) Experience tells reasonable development becoming totally different once a 'real' planning application is made.  b) The railway embankment is one of the last bits of green left in Wembley central and vital for the wildlife.  c) The hill has a tendency to 'slide down' and homeowners are very worried that major works on the embankment will make it further unstable.</p>	<p>a) One of the objectives for a supplementary planning document is to guide development which should conform to the standards set in the SPD. However, a level of flexibility should be given to developers to encourage creativity and deliverability.  b) Brent Council understands the concern of local people. It is proposed to amend the guidance so that an objective is included to minimise the impact of development on the SINC. Measures to mitigate impact on nature conservation could include improved assess to openspace for the local community.  c) Soil investigation will be required when applying for</p>	<p>a) No change necessary  b) &amp; c)The planning objectives (p7) have been amended to clarify the council's position to limit development on the north side to a level that minimises impact on the</p>

Ref No.	Representation	Summary of Representation	Council's Response	How SPD has been altered
			Building Regulations consent. Suitable foundation will then be identified.	surrounding suburban residential scale and character.
WL009	Nigel Hawkey, Quintain Estates and Development Plc	<p><u>Consultation Programme</u></p> <p>a) Proposed SPD adoption should be scheduled after receiving the SSA inspector's report.</p> <p><u>Transport</u></p> <p>b) The contributions towards the improvements of traffic flow and pedestrian safety of Wembley Triangle..including the improvement of the South Way Junction" should not be included as they have been included in LDA Lands permission (04/0379)</p> <p>c) Planning permission within SPD area should bear a proportionate share of S106 contributions which should be pooled across the entire Masterplan Area.</p> <p><u>Servicing</u></p> <p>d) Questions if a servicing assessment has been carried out to determine impacts on the junctions of the servicing arrangements</p> <p>e) Copland School - the SPD should clarify the provision of the nursery and primary school facilities</p> <p><u>Delivery</u></p> <p>f) Queries how the SPD sits with the Wembely Masterplan SPD which is better placed to deliver soonest the Borough's targets for Wembley, including in relation to housing and other benefits.</p> <p>g) The SPD needs to clarify how the financial viability of development proposals will be assessed.</p>	<p>a) Noted- adoption will take place after the SSA is adopted</p> <p>b) Noted - SPD amended</p> <p>c) Noted - SPD amended</p> <p>d) Brent Council has carried out a junction assessment study to examine how the Triangle junction and the Wembley Hill Road Bridge should be improved to cope with the increased traffic generated by the prospective developments in Wembley Regeneration Area, including the Wembley Link and Wembley Masterplan areas. Major applications will be required to submit traffic impact assessments to support their proposals.</p> <p>e) The DPD does not currently envisage primary school and nursery facilities on the Copland site.</p> <p>f) Brent Council expects development proposals to come forward in phases which would be similar to those in the Wembley Masterplan area. Hence, there should not be any priority for community benefits.</p> <p>g) Brent S106 SPD standard charge will be applied to all developments. Applicants are required to submit viability studies if they cannot meet the financial contributions or to demonstrate the appropriate level of affordable housing to be provided in accordance with Brent's Core Strategy and policy 3A.10 of the London Plan.</p>	<p>a) Brent Executive Committee has been asked to adopt the Wembley Link as a SPD supplementary to the Core Strategy and Site Specific Allocations subject to the Council's adoption of the SSADPD.</p> <p>b) The planning objectives (p7) have been amended to read: To secure contributions that will be used to mitigate the impacts of development on traffic flow in the affected areas.</p> <p>c) S106 Planning obligations and Infrastructure provision note added to delivery section.</p> <p>d) Requirement for traffic impact assessment is inserted (p18).</p> <p>e) No change necessary.</p> <p>f) A phasing plan is now included in</p>

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				Section 5.2 Development Phasing g) No change necessary
WL010	Tracey Louis-Fernand Octavia Housing, Owner of Elizabeth House	<ul style="list-style-type: none"> <li>a) Support the regeneration proposed to the High Road. Welcome medium to low rise development which will compliment both the High Road and adjacent residential streets.</li> <li>b) Any commercial proposals for the Brent House/Copland School site will need to be complementary to consent granted Elizabeth House and not adversely affect the proposal for a retail/café type environment at the ground floor level</li> <li>c) More reference needs to be made to the flagship scheme at Elizabeth House</li> <li>d) The road to the side of Elizabeth House will need to be well lit.</li> <li>e) Any sound attenuation works are needed to limit the impact to residents in particular at school opening and closing times.</li> <li>f) Request for remaining as consultee in this area</li> </ul>	<ul style="list-style-type: none"> <li>a) Support noted</li> <li>b) &amp;c) Suggestions agreed</li> <li>d) Secured by Design principles will be applied to all major developments. The road will be adopted and lit, meeting the Council's standards.</li> <li>e) UDP policy EP2 Noise and Vibration will be applied when assessing noise and/or vibration generating development.</li> <li>f) The consultee will be consulted as statutory planning procedure when major applications are received.</li> </ul>	<ul style="list-style-type: none"> <li>a) No change necessary.</li> <li>b) &amp; c) More reference to Elizabeth House has been made in the SPD, in particular referring to the Phasing Plan (p37).</li> <li>e) f) no change necessary</li> </ul>
WL011	David D'Arcy Network Housing Group Ltd	<ul style="list-style-type: none"> <li>a) Strongly supports the document.</li> <li>b) Physical Improvements and Connectivity - Welcomes proposals to improve the area and linkages between the High Road, Wembley Stadium and a new high street that will run parallel to Olympic Way.</li> <li>c) Building Heights and Density - Supports the approach of controlling the proliferation of tall buildings in SPD area except in key locations, Support prominent buildings at travel interchanges</li> <li>d) Welcomes the approach to preserve views through and across to Wembley Stadium</li> <li>e) Housing Provision -Questions whether the provision of family housing (3-bed plus) is appropriate in town centre environment. 1-2 bedroom units may be more appropriate.</li> <li>f) Car Parking - welcomes 0.5 space per unit</li> </ul>	<ul style="list-style-type: none"> <li>a) - d) Support noted</li> <li>e) Being in the town centre offers easy access to its many amenities, including shops, restaurants, cafes, bus stops, interchanges, train and underground stations and schools that are essential to families. There will be 1-2 bed accommodation to cater for different sizes of households. The Council will require provision of</li> </ul>	<ul style="list-style-type: none"> <li>a) - i) No change necessary.</li> </ul>



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		<p>g) Limiting car ownership raised the question of appropriateness for family housing</p> <p>h) Design_Led Developemnt - Supports the approach</p> <p>i) Flexible Approach - Strongly supports the flexible approach of providing alternative development options</p>	<p>adequate amenity space for ay family housing.</p> <p>f) Support noted</p> <p>g) As mentioned in e) Wembley Town Centre has excellent public transport network where private cars are less necessary. Major residential developments will be required to sign up to car clubs as well</p> <p>h) &amp; i) Support noted</p>	
WL012	Paul Roberts, Greater London Authority	<p>a) It should be noted a 60:40 intermediate to social rented split in the draft replacement London Plan. Housing supply targets will be developed over the next two years. Please note supplementary housing evidence for the London Plan EIP including an economic viability assessment.</p> <p>b) The Council is encouraged to make reference to the draft Housing Design Guide</p> <p>c) Suggests a reference to the Mayor's draft SPG on "providing for Children and Young People's Play and Informal Recreation" and a reference to London Play Policy 3D.11i</p>	a) - c) Suggestions noted	<p>a) No change necessary.</p> <p>b) Included in the last bullet point on page 5</p> <p>c) Text inserted in Section 2.4 "Open Space"</p>
WL013	Eleri Randall, Environment Agency	<p>a) Pleased with the requirements and recommendations in the Sustainability section, however this SPD can go further.</p> <p>b) Page 5 - Main vision should incorporate "Ensuring development is as sustainable as it can be"</p> <p>c) Page 25 - section mentioning green roofs should reference the SuDS hierarchy (Environment Agency's "Practical Guide to SuDS"). The variety of SuDS techniques available to manage surface water and achieve greenfield run off rates means that any development can include a fully sustainable drainage scheme. Developers should incorporate SuDS early in the site evaluation and planning processes and include provision for maintenance.</p> <p>d) Recommends Greenfield rates should be achieved for all sites that will ensure the risk of surface water flooding is reduced through redevelopment and also would reduce the pressure on the existing sewer system</p>	<p>a) Support noted</p> <p>b) Suggestion agreed</p> <p>c) Suggestion agreed</p> <p>d) The SPD is not intended to introduce new policy but expand on existing policy. Developments over 1 ha need to be referred to the Environment Agency, the Greenfield runoff rates are required to achieve anyway.</p>	<p>a) No change necessary</p> <p>b) SPD text on page 5 amended to suit.</p> <p>c) SPD text on p24 amended to suit.</p> <p>d) No change necessary</p>

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		<p>e) Page 25 - Flood risk should be mentioned in the sustainability section. This should include SuDS, the sequential approach and provision of safe access and egress. Flood Risk Assessments with specific regard to surface water will be needed for developments within the SPD area that are over 1ha. This will include the Brent House and Copland School site.</p> <p>f) Suggest the Council decide if maps of Areas Susceptible to Surface Water Flooding (ASStWF) or the Flood Map for Surface Water (FMfSW) reflects surface water flooding in the area.</p> <p>g) Page 25 recommends an early consideration of the issues of capacity of existing water and sewerage infrastructure</p> <p>h) Supports the Code for Sustainable Homes level 4 for new build housing and BREEAM excellent rating for commercial and community development</p> <p>i) Page 25 - Land around railways is often contaminated and site specific Preliminary Risk Assessments would need to be carried out to identify contamination issues.</p> <p>j) Page 41 - Welcome the ecology considerations in the area around the Chiltern Railway designated for Nature Conservation importance and supports mitigation and compensation measures will be provided to ensure there is no overall net loss to biodiversity value and a continuous wildlife link is provided through the site.</p>	<p>e) Suggestion agreed</p> <p>f) Brent will make the decision outside the SPD</p> <p>g) Brent Council agrees with this and the suggestions from Thames Water (WL006)</p> <p>h) Support noted</p> <p>i) Suggestion agreed</p> <p>j) Support welcomed.</p>	<p>e) SPD text on p24 amended to suit.</p> <p>f) No change necessary</p> <p>g) SPD text on p24 amended</p> <p>h) No change necessary</p> <p>i) SPD text on p 15 (site constraints) amended to suit.</p> <p>j) No change necessary</p>
WL014	Nicholas Bishop, English Heritage	<p><b>a) Page 14: Baseline data</b> Suggests additional lines to encapsulate the wider historic character context for the SPD area which proposals will impact and need to successfully integrate with, such as its residential scale.</p> <p><b>b) Pages 19-20: Tall buildings</b> There should also be some consideration of impacts on the surrounding scale and character, to provide the evidence for the conclusion on the third line of page 20 that "the proposals for tall</p>	<p>a) Suggestion agreed</p> <p>b) The heights set out in the SPD give an indication of the level of development that will be appropriate based on thorough analysis conducted by the Council and the relationship between the Central Square tower and the rest of the area in a suburban setting. Brent recognises</p>	<p>a) SPD text on p8 amended to suit.</p> <p>b) Justification notes and images added to support the council's review of approach to very</p>

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		<p>buildings do not sit well within the overall context of the area”.</p> <p><b>c) Page 22: Open spaces</b> The King Edward VII could be recognised in the text, along with its heritage value, and opportunities could be identified to conserve this value through investment and enhancement opportunities arising from planning obligations.</p> <p><b>d) Page 30: Ecclestone Place</b> The diagrams on page 30 could be labelled to show more clearly which parts of Ecclestone Place would be retained or developed according to the different options. English Heritage would regret the loss of the terraces which make a positive contribution to the local character and sense of place, as set defined in PPS5 policy HE3.</p> <p><b>e) Strongly advise Brent conservation staff are involved throughout the preparation and implementation of the SPD.</b></p>	<p>that members of the public have expressed strong concerns over building heights in the Chesterfield House and Copland Village applications and recognises the suburban context of the area when providing comfortable living environments.</p> <p>c) Suggestion agreed</p> <p>d) Suggestion agreed</p> <p>e) The council confirms that Brent conservation staff are involved throughout the process.</p>	<p>tall buildings (p12).</p> <p>c) SPD text on p13 amended to suit.</p> <p>d) The number of options has been reduced to clarify that there is an option to either keep or lose the whole terrace.</p> <p>e) No change necessary</p>
WL015	D Kumar	Prefers proposal Option 3	Preferred option noted.	No change necessary
WL016	David Labenk	In favour of a new school being built.	a) Support noted	No change necessary
WL017	Tuie Mehte	In favour of a new school which is long overdue.	The Council recognises the pressing need for a new school. A food store and mixed use development on Brent House and Copland site will help fund the school rebuilding.	No change necessary
WL018	Shane Johnschwage	<p>a) In favour of the development</p> <p>b) Suggests it should be made clear that, during consultation, what resources from the sale of Copland land will be made available for the school.</p>	<p>a) Support noted.</p> <p>b) As the Copland School is the landowner of the school site, it will be up to the school governing body to decide how to spend the money. However, there would still be a funding gap even the sale of land paid for the new school. Other sources of funding are therefore needed.</p>	a) & b)No change required.
WL019	G Millinton	a) Schemes offered seem excellent -especially the availability of a new school	a) & b)Support noted	a) & b)No change required.

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		b) The area needs a re-vamp - a dual use for Brent House and a supermarket could seem very sensible		
WL020	Mr Rup Lal Pall	Excellent idea and hopes a new school at Copland.	Support noted	No change necessary
WL021	Sdagat Jabeer	a) All the proposals look positive b) Appalled at the conditions of the school, questions why the pace of the Copland development is so slow that students have to study in such conditions.	a) - b) Support noted	a) - b) No change necessary.
WL022	Everton Talker	a) Welcomes the proposals b) Disagrees the use of the school site and the open field other than a recreation field , five-a-side , no more retail development c) Supports the proposal for new flats at corner of Ecclestone mews and Wembley Hill Road d) Urges to replace Ecclestone Mews with new houses and new garages.	a) Support noted b) Without locating the new school in part on the playing field, as proposed in the original Copland Village application, no funding could be raised. Nevertheless, by far the majority of the open field will be kept. c) Support noted d) Ownership at Ecclestone Place is fragmented, acquisitions for all the properties will be challenging. That is the reason for having two design options in the SPD (p29). ....	a) - d) No change necessary.