

## **PRE-APPLICATION REPORT TO COMMITTEE**

**Planning Committee on** 28 June 2017  
**Item No** 06  
**Case Number** 17/1080/PRE

### **SITE INFORMATION**

**RECEIVED:** 2017

**WARD:** Tokyngton

**LOCATION:** Access Self Storage, First Way, Wembley HA9 0JD

**SCHEME:** Proposed demolition of existing building and erection of a mixed use scheme of approximately 448 residential units (build-to-rent), 6,000 sqm storage space and 1,000 sqm office space. The scheme currently has a breakdown of 21 studio, 187 1-bed 2 person, 41 x 2 -bed 3-person, 151 x 2-bed 4 person and 48 x 3-bed 5 person homes. Heights vary from 8 – 22 storeys across five main blocks/buildings above a three storey podium..

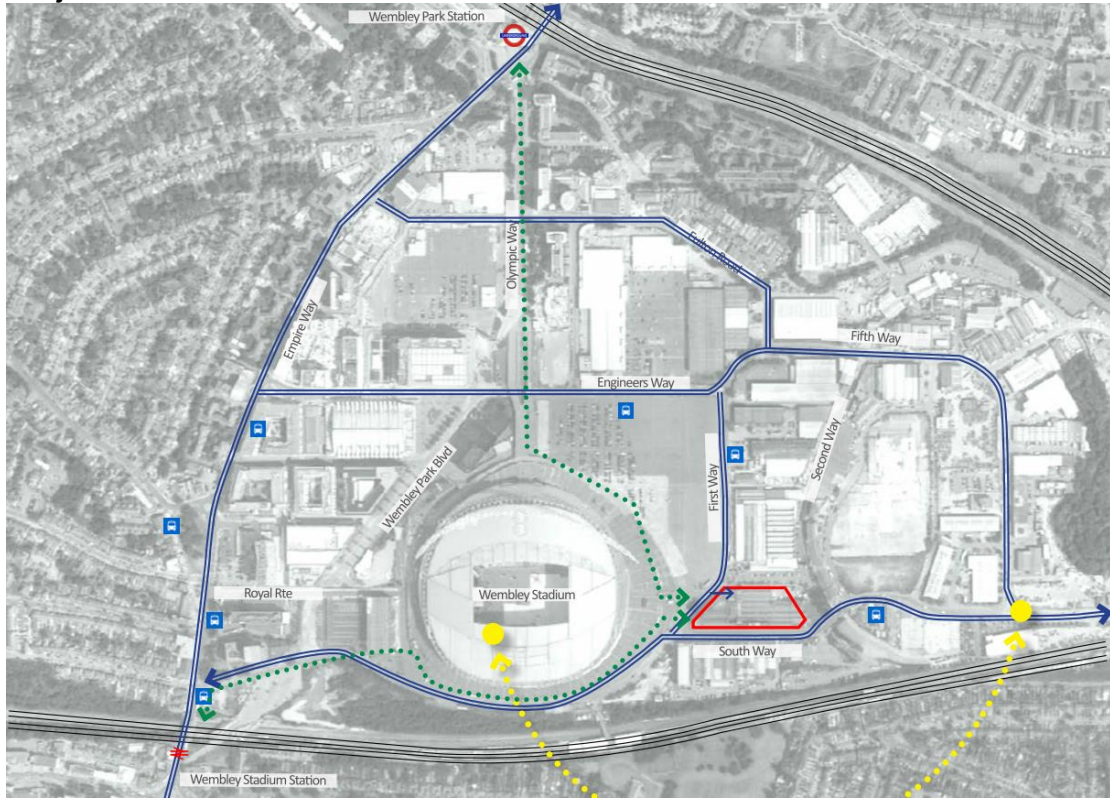
**APPLICANT:** Access Self Storage

**AGENT:** DP9 Planning Consultants/ Collado Collins Architects

### **SITE MAP**

**This map is indicative only**

Subject site noted with red outline



DEVELOPMENT DETAILS

**Ref:** 17/1080/PRE

**Location:** Access Self Storage, First Way, Wembley HA9 0JD

**Ward:** Tokyngton

**Description:** Proposed demolition of existing building and erection of a mixed use scheme of approximately 448 residential units (build-to-rent), 6,000 sqm storage space and 1,000 sqm office space. The scheme currently has a breakdown of 21 studio, 187 1-bed 2 person, 41 x 2-bed 3-person, 151 x 2-bed 4 person and 48 x 3-bed 5 person homes. Heights vary from 8 – 22 storeys across five main blocks/buildings above a three storey podium.

Applicant: DP9 Planning Consultants/ Collado Collins Architects

Case Officer: Terry Natt (North Team)

## **BACKGROUND**

1. This pre-application submission for a new mixed use development is being presented to enable Members of the committee to view it before any subsequent applications are submitted and to comment upon it. The development does not constitute an application for planning permission and any comments made upon it are provisional and subject to full consideration of any subsequent revised application and the comments received as a result of consultation, publicity and notification.
2. This is the first time the proposals shown within this submission have been presented to Members.

## **PROPOSAL and LOCATION**

### **Proposal**

3. The application will seek approval for the demolition and rebuilding of the Access Storage building located on the corner of First Way and South Way, Wembley. It is proposed to provide a mixed use development including retaining the existing Access Storage operation of around 6,000 sqm, 1,000 sqm affordable office space on the lower floors of the new building with residential uses located on top of a podium.
4. Above the storage facility and affordable office space, it is proposed accommodate 448 residential units in five blocks located onto of a podium with height that range from 8 – 22 storeys.

#### Proposed residential mix

5. The following residential mix is proposed:

Size	Number	Percentage
Studio	21	4.7
1-bed	187	41.7
2-bed	192	42.9
3-bed	48	10.7
Total	448	

The break down of units by tenure has not been provided yet and will be subject to further discussion.

#### Car parking and cycle storage

6. A total of 11 parking spaces (including 2 disabled spaces) are proposed for the storage and non-residential uses, situated within the building at ground level. A

servicing bay is also provided at ground level. 143 residential parking spaces are proposed at basement level, comprising 122 standard spaces and 26 accessible spaces. This equates to a parking ratio of 0.32. Cycle storage is also proposed at basement level.

### **Site and Surroundings**

7. The site is approximately 0.94 hectares (ha) in area and is currently occupied by an 'Access Self-Storage' commercial unit. The Site is bound by First Way to the west, with Wembley Stadium directly beyond First Way; South Way (the B4557) to the south; light industrial units along Second Way to the east and commercial units housing food wholesalers to the north.
8. The site is not within a conservation area, nor does it affect the setting of a listed building.
9. The site is located within Wembley Growth Area and Strategic Cultural Area. It forms part of site allocation W28 which is identified as appropriate for leisure, tourism, cultural and office uses and has an indicative capacity of 1,500 residential units.

### **Planning History**

10. There is no relevant planning history for this property

### **CONSULTATION**

11. In accordance with the National Planning Policy Framework and Brent's Statement of Community Involvement the developer is required to engage with the local community whilst developing their proposals for the site. No details on such consultation have yet been provided, however this will be expected as part of a full application.
12. The proposals to date have been subject to internal consultation with the Council's Planning Policy department, Transport officers and Regulatory Services.
13. The following will be consulted regarding any subsequent planning application:

Consultee:-  
(Internal)

- Ward Councillors for Wembley Central (Brent)
- Transportation (Brent)
- Environmental Health (Brent)
- Landscape Design (Brent)
- Heritage & Conservation officer (Brent)
- Tree Officer (Brent)
- Housing (Brent)
- Urban Design Officer (Brent)
- Flood/drainage engineer (Brent)

(External)

- Secure by Design Officer (Met Police)
- Thames Water
- Greater London Authority (GLA)
- Transport for London (TfL)
  
- All existing properties and addresses within at least 100m of the application site.

*(N.B. This is not a final list and is subject to further review/change should any formal planning application be submitted)*

## **POLICY CONTEXT**

14. The National Planning Policy Framework (NPPF) 2012. At the heart of the NPPF is a presumption in favour of sustainable development. Building a strong, competitive economy is of the core principles of the NPPF and paragraph's 21 and 22 are of relevance.
15. London Plan consolidated with alterations since 2011 (March 2016)
16. Mayor's Housing SPG
17. Brent Local Plan Development Management Policies 2016
18. Brent LDF Core Strategy 2010
19. Brent Wembley Area Action Plan 2015
20. Supplementary Planning Guidance 17 'Design Guide for New Development' (2002)

## **MATERIAL PLANNING CONSIDERATIONS**

21. The main issues relevant to this proposal that the Committee should be aware of at this stage are:
  - Principle of development
  - Scale, height, massing and design of the development within its local context
  - Height and protected views
  - Quality of residential accommodation
  - Affordable housing provision
  - Transport, access and parking
  - Environmental health

### **Issue 1**

#### **Principle of development**

22. The site is located within Wembley Growth Area and Strategic Cultural Area. It forms part of site allocation W28 which is identified as appropriate for leisure, tourism, cultural and office uses and has an indicative capacity of 1,500 residential units. The principal of mixed-use residential and employment development on the site is therefore supported.
23. Policy WEM 10 promotes the inclusion of low-cost business start up space as part of major mixed-use developments. The inclusion of affordable office floorspace is strongly supported. The Council normally secures arrangements to ensure that Affordable workspace is managed by a recognised operator of such space.
24. The pre-application documents indicate a "cycle cafe" space would also be provided as part of the development. The site is within an out-of-centre location but in an area where a significant number of new homes are to be provided. The café unit is of a size that is likely to serve a very local catchment and would not affect the viability of the nearby designated town centres.

## **Issue 2**

### **Scale, height, massing and design of the development within its local context**

25. Due to the prominent siting and scale of the development, the scheme is currently being considered by a CABE Design Review Panel. The first stage including a site visit, discussion and feedback have been undertaken with final written comments expected from CABE in late June 2017. It is expected that the current proposal will change as a result of feedback from CABE.
26. The council supports the applicant's approach to a thorough character and context analysis performed in line with the GLA's SPD and London Plan Policy. This design approach is considered to be appropriate though there are areas where further work/justification is required.
27. Given the scale and the proximity of the tower elements within the scheme, it will need to be demonstrated that the proposal meets relevant standards of in terms of separation, daylight and sunlight etc.
28. The south elevation with recessed ground floor and planting will need to be carefully considered to ensure it provides an appropriate setting for the building. The scheme seeks to strike a balance between active ground floor uses, and security and access, particularly in consideration of Wembley Stadium event days where thousands of people use the immediately surrounding area for access and milling about.
29. The relationship of the proposed development with the existing and emerging Quintain masterplan needs to be explored and demonstrated in supporting documents. How the proposal relates to the surrounding development will be the key to its success. In seeking to justify the heights the applicant points to local precedents and the Quintain masterplan.
30. This is a reasonable approach as the emerging context into which this building will be inserted is of high importance. Both the applicant and developer await response from CABE prior to finalisation of the design of this scheme. It is recognised that the corner location can accommodate more height than the adjoining buildings.
31. Full details of the proposed materials would need to be submitted at application stage to ensure that the finished appearance of the building is appropriate. A Design Code which provides further information and sets some key principles regarding the detailed design of the building should be included at application stage. The redevelopment of the site has the potential to result in a high quality building that contributes significantly to the regeneration of Wembley.

## **Issue 3**

### **Height & Protected Views**

32. The site is identified in the Wembley Area Action Plan as appropriate for tall buildings, subject to demonstrating the highest architectural quality, and assessment of impact on views and amenity. In accordance with policy WEM 5 a 3D digital model will be required to allow a full assessment of the design quality and visual impact. It is noted the presentation includes photographs to the site from the protected views identified in the Wembley area Action Plan.
33. In response the applicant has designed a series of towers ranging in height from 8 to 22 storeys on each side of an east – west axis in order to maximise views towards Wembley stadium from the east of the site. This approach is supported in principle, subject to the reasonable satisfaction of standards such as amenity for future inhabitants, sunlight access and open space provision.

34. The proposal is a very large addition to the Access Storage site when compared to the surrounding plots. The justification for the height needs to be clarified but also the resultant scale of the building needs to be justified in terms of its impact on the locality. This is in terms of its relationship with surrounding properties and their occupants, as well as the effects it will have on and contributions that it will make to the local area.
35. Shadow casting should be undertaken to evaluate the potential overshadowing of surrounding properties. A daylight and sunlight report which tests the potential impacts of the proposal on the existing and consented buildings and spaces in the vicinity undertaken in accordance with BRE209 should be submitted.

#### **Issue 4**

##### **Quality of residential accommodation**

36. All residential units will need to be compliant with London Plan space standards, and the Part M4(2) criteria in relation to accessible and adaptable housing, expressed in the nationally prescribed optional housing standards.
37. Details will need to be submitted which easily present the layout of the proposed units and demonstrate that it complies with the London Plan, Mayor's Housing SPG, Lifetime Homes standards, the Wheelchair Accessibility Standards (M4(3), for 10 % of units) and the Council's SPG17 guidance relating to external amenity space.
38. The layout and access for communal areas will also need to be made clear with an appropriate layout being provided.
39. The development of the site is to create a buffer between proposed residential development to the west and the industrial uses in Wembley Strategic Industrial Location to the east. The development will be required to have careful regard to the relationship with, and impact of, the waste facility on Fifth Way and adjoining industrial uses, and demonstrate an acceptable amenity can be achieved.
40. It should also be noted the sites is located within an Air Quality Management Area, as such London Plan policy 7.14 applies and the development should demonstrate it is air quality neutral and makes provision to address local air problems. For example through greater use of sustainable transport modes, green infrastructure and buffer zones.
41. A communal garden is contained on the podium inside of the development and is surrounded by towers to the north and south. It is also noted that the communal gardens will have a fairly enclosed character by virtue of the scale and immediacy of surrounding buildings. The design and layout of the communal roof garden will need to be carefully considered to ensure its success.
42. The development would be expected to meet the standards for external amenity space set out in Brent Policy DMP19. Shortfalls in external amenity space can be off-set through the provision of additional internal space (beyond minimum standards) or contributions towards off-site improvements or provision. The application submission should also demonstrate how the scheme will accord with the Mayors policy and guidance regarding childrens' and young persons play space.
43. Most residential units will benefit from a good level of outlook, with the number of dual aspect units maximised and the few single aspect units that are present being no larger than one bedroom flats and providing east or west facing outlook which is considered acceptable.

## Issue 5

### Affordable housing provision

44. London Plan policy 3.12 requires borough's to seek the maximum reasonable amount of affordable housing, taking account of a range of factors including local and regional requirements, the need to encourage rather than restrain development and viability. The policy requires boroughs to take account of economic viability when negotiating on affordable housing, and other individual circumstances.
45. Adopted DMP policy DMP 15 confirms the Core Strategy target (policy CP2) level of 50% of all new homes in the borough to be provided as Affordable Housing. The maximum reasonable amount will be sought on sites capable of providing 10 units or more. 70% of new affordable housing should be social/affordable rented housing and 30% intermediate housing at affordability levels meeting local needs. Where a reduction to affordable housing obligations is sought on economic viability grounds, developers should provide a viability appraisal to demonstrate that schemes are maximising affordable housing output.
46. London Plan policy 3.12 says that the maximum reasonable amount of affordable housing should be sought when negotiating on schemes and that negotiation on sites should take account of their individual circumstances including development viability.
47. The Financial Viability Assessment has not been submitted to the Council as yet and this would not normally be undertaken and submitted with the planning application.
48. Brent policy DMP15 sets out a local target ration of Affordable Rented to Intermediate accommodation of 70:30. The London Plan sets out a target of 60:40. However, greater weight is typically given to the local target as it represents local housing need.
49. The provision of private rented accommodation is supported through Brent Policy WEM22, providing long term financial, management and nomination arrangements are in place.
50. The current mix of units proposed is as follows:

APARTMENT NUMBERS					
Studio	1 Bed 2P	2 Bed 3P (1 bath)	2 Bed 4P (2 baths)	3 Bed 5P (2 baths)	TOTAL
<b>21</b>	<b>187</b>	<b>41</b>	<b>151</b>	<b>48</b>	<b>448</b>
4.7%	41.7%	9.2%	33.7%	10.7%	100.0%

<b>21</b>	<b>187</b>	<b>192</b>	<b>48</b>	<b>448</b>
4.7%	41.7%	42.9%	10.7%	<b>100.0%</b>

51. Targets for the mix of homes is set out within Policy WEM18 and table 7.1 of the Wembley Area Action Plan. This sets out the following mix of units by tenure for the plots fronting First Way (see table below). As the tenure split is not known at present, it is not clear at this point in time whether the mix of units will accord with these target percentages.



	Affordable Rent	Intermediate	Private
1-bed	15%	45%	30%
2-bed	35%	45%	55%
3-bed	45%	10%	15%
4-bed	5%		

Target mix of units by size and tenure from table 7.1 of the Wembley Area Action Plan.

52. WEM 22 allows flexibility on the mix of target where PRS is delivered, however this is subject to a reasonable proportion of units being made available at or below local housing allowance levels. Therefore further information will be required on the level of affordable housing before a suitable mix can be established. The Mayor's emerging Housing SPG sets out an approach to build to rent homes, including an approach to covenants to secure new homes as build to rent and clawback mechanisms in the event units are sold during the covenant, which the application will need to adhere to.

## Issue 6

### Transport, access and parking

53. The site generally has a low level of public transport accessibility at present, with a PTAL value varying from 1 to 2. TfL proposals to significantly improve bus services to the eastern side of the Stadium and the shortening of the walking route to Wembley Park station once the Quintain eastern lands are built out are likely to increase the PTAL value at the western end of the site to 3 / 4 in the future. TfL have secured funding towards the improvements to the bus serves through all major schemes in the area and are likely to request Section 106 funding from this scheme towards these improvements.
54. The quality of the pedestrian and cyclist environment around the site is currently poor and will improve when the roads in the area are amended in line with WAAP proposals. The WAAP proposals for South Way include:
- The removal of the one-way system to allow two-way flow on both First and South way,
  - The widening of the carriageway to accommodate cycle lanes, which allows a three-lane tidal flow system alongside the site on Wembley Stadium event days, and
  - Signalisation of the First Way/South Way junction.
55. The northern access (to First Way) will be retained as the primary vehicular access to the site, serving the basement car park and commercial parking/servicing. A new egress is proposed from South Way to accommodate large delivery vehicles. There will be periods at the end of Wembley Stadium events where surrounding roads will become inaccessible as vehicles cannot be allowed to emerge from the site at these times.
56. Council officers are working closely with the applicant to secure high quality pedestrian routes both through and around the site including working to provide separate vehicular and pedestrian access.
57. The amount of parking proposed complies with standards for the office use (5 spaces proposed), self-storage (12 spaces proposed ) and residential (143 spaces proposed) and the proposed provision of a disabled space for each wheelchair accessible unit, plus electric vehicle charging and Car Club spaces, is noted and welcomed. The cycle stores will need to satisfy London Plan standards and a publicly accessible bicycle stand should be provided,

58. It will be important for the applicant to provide upon submission of a planning application, a full Transport Assessment, Travel Plans, a Delivery & Servicing Plan and Construction Logistics Plan. This will ensure a full consideration of wider transport impacts. The Travel Plan will need to include a promotion of local Car Clubs to future residents, including subsidised membership.

## **Issue 7**

### **Environmental Health**

59. Key environmental health issues include: Noise insulation for residents given the proximity to commercial premises and the adjoining road, management and security on Wembley Stadium Event days, impact on air quality, construction noise and dust, asbestos and the potential for light pollution from any external lighting.
60. The abovementioned concerns will be addressed as part of a full planning application with planning conditions or informative notes as appropriate. The noise insulation will be addressed through requirements for:
- Adherence to (and a test of) the relevant British Standards for sound insulation;
  - The submission of an air quality impact assessment to consider the air quality impact building works and the operations of the building will have on local air quality and future residents;
  - The submission of an air quality neutral assessment in accordance with GLA guidance;
  - A construction method statement to detail measures that will be taken to control dust, noise and other environmental impacts of construction , and;
  - A lighting spillage plan to demonstrate that the external lighting from the new development will not impact on the surrounding residential premises.

### **OTHER CONSIDERATIONS**

61. A detailed energy/sustainability strategy would need to be submitted as part of any subsequent full application to demonstrate compliance with the Mayor's strategy of Be Lean, Be Clean, Be Green, as well as London plan policies relating to reduction carbon emissions and renewable energy, in accordance with London Plan policy 5.2.

### **PLANNING OBLIGATIONS**

62. If approved, planning obligations under a Section 106 agreement will be necessary to secure and monitor certain aspects of the development. With the information available at present, it is likely that a Section 106 agreement will be needed for the following aspects:
- The delivery of affordable housing, including a post completion review of financial viability and a contribution towards affordable housing should viability conditions improve;
  - To ensure that the Council is notified of development commencement at least 28 days prior to works starting;
  - To enable the development of the proposal to improve the training and employment of Brent residents
  - To secure and monitor a travel plan
  - To secure funding for the provision of a publically accessible cycle stand on the public footway fronting the commercial unit
  - To secure any other financial contributions that may be required by the Council
  - Any other obligations required (at this time not known)

## **COMMUNITY INFRASTRUCTURE LEVY (CIL)**

63. This would be development that is liable for Mayoral and Brent CIL. The level of liability that this would attract will be confirmed at a later stage when the precise quantum and form of proposed development is known.

## **CONCLUSIONS**

64. Members should note the above development is still in the pre-application stage and that additional work remains to be carried out prior to the submission of any subsequent planning application.