

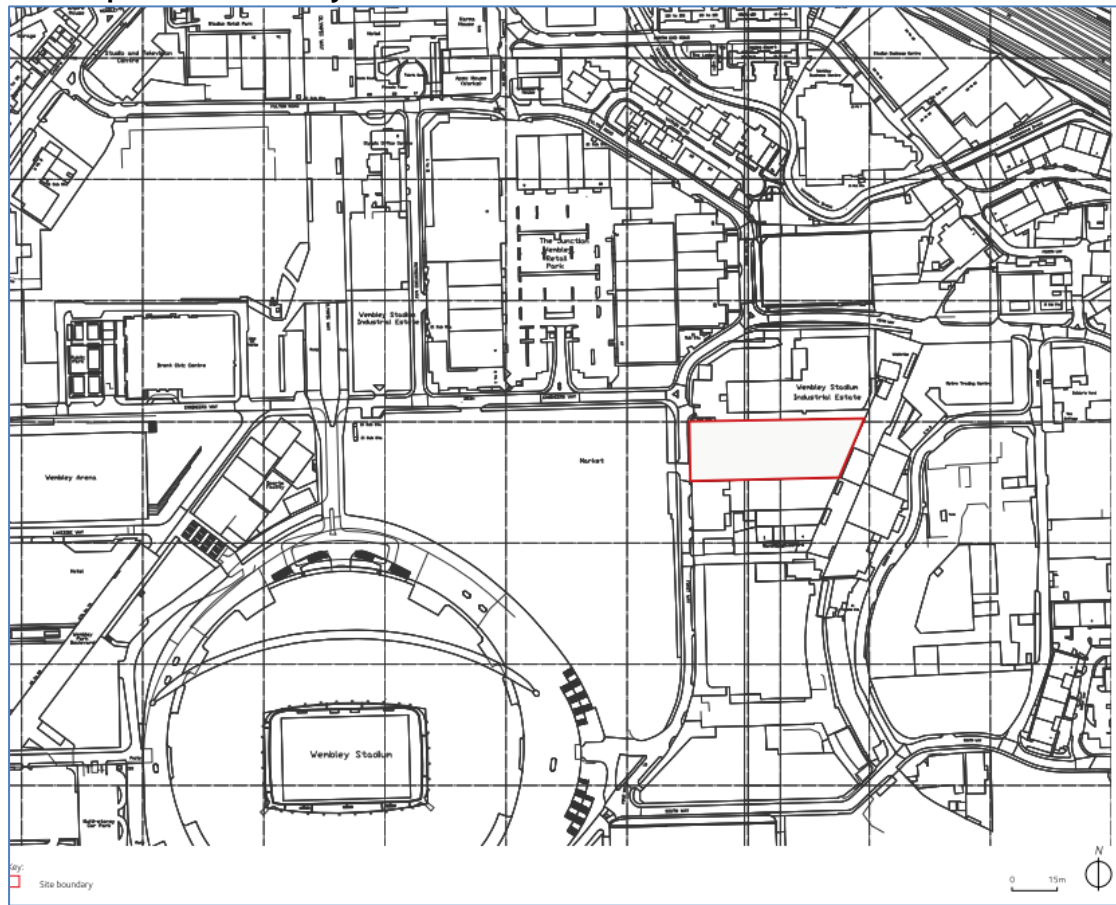
PRE-APPLICATION REPORT TO COMMITTEE**Planning Committee on 12 July 2017****Item No****Case Number 17/1097/PRE****SITE INFORMATION****RECEIVED: March 2017****WARD: Tokyngton****LOCATION: Cannon Trading Estate, First Way, Wembley, HA9 0JD****SCHEME:** Proposed demolition of existing building and Redevelopment of the site to provide a 6 – 10 storey building comprising the UCFB campus, with the following elements:

- Teaching/Academic space – An auditorium/lecture theatre, seminar rooms, learning resource centre;
- Office space to house finance, marketing, student services, welfare etc.
- Office space for start-up units/incubator space associated with the emerging knowledge base from UCFB Wembley;
- Student accommodation with c. 680 beds in a mixture of studios, twudios, threedios, in 5/6 bedroom clusters; and
- Ancillary space, which is likely to include a student learning centre, gym, laundries, outdoor amenity space, and a coffee bar.

APPLICANT: University College of Football Business (UCFB)**CONTACT:** Mr Owain Nedin (Lichfields)**PLAN NO'S:** 2107-00-BR-0002-D04 (Development Proposals document)**LINK TO DOCUMENTS ASSOCIATED TO THIS APPLICATION** No plans as this is a pre-application item. Members will view a presentation at Committee.

SITE MAP

This map is indicative only



DEVELOPMENT DETAILS

Ref: 16/0371/PRE

Location: Cannon Trading Estate, First Way, Wembley, HA9 0JD

Ward: Tokyngton

Description: Proposed demolition of existing building and Redevelopment of the site to provide a 6 – 10 storey building comprising the UCFB campus, with the following elements:

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Applicant: University College of Football Business (UCFB)

Agent: Mr Owain Nedin (Nathaniel, Lichfield & Partners)

Case Officer: Toby Huntingford (North Team)

BACKGROUND

1. This pre-application submission for a new university campus 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

The application will seek approval of the new development which proposes the redevelopment of the site to provide a 6 to 11 storey building comprising a permanent university campus for University College of Football Business (UCFB).

Proposed uses

- Teaching/Academic space – An auditorium/lecture theatre, seminar rooms, learning resource centre;
- Office space to house finance, marketing, student services, welfare etc.
- Office space for start-up units/incubator space associated with the emerging knowledge base from UCFB Wembley;
- Student accommodation with c. 680 beds in a mixture of studios, "twudios", "threedios", in 5/6 bedroom clusters; and
- Ancillary space, which is likely to include a student learning centre, gym, laundries, outdoor amenity space, and a coffee bar.

Car parking

3. It is proposed to retain an access road along the southern side of the site to provide seven parallel parking spaces and two disabled spaces at its far end.

Site and Surroundings

4. The subject property, Cannon Trading Estate, comprises low rise industrial premises within the Wembley Stadium Industrial Estate on First Way. Surrounding uses are also industrial.
5. To the north is another industrial unit, Kelaty House, presently another industrial unit, although permission has been granted for the site's redevelopment for mixed use incorporating student accommodation and a hotel. To the south is the Latif House, another industrial unit.
6. To the east are further industrial units that front Second Way. These units are industrial in nature and form the westernmost part of an area designated as Strategic Industrial Land (SIL).
7. The land to the west, immediately across First Way forms part of the Quintain Masterplan Development (Plot E03) for which a reserved matters application has recently been approved and works have recently commenced on this site (17/0016). This plot is proposed to provide 743 residential units, 569sqm of commercial space and an energy centre as part of the wider masterplan development around Wembley Stadium.

Planning History

8. There is no relevant planning history for this property

CONSULTATION

9. In accordance with the National Planning Policy Framework and Brent's Statement of Community Involvement the developer is strongly encouraged 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.
10. The proposals to date have been subject to internal consultation with the Council's Planning Policy department, Transport officer, Regulatory Services and Urban Design officer.
11. The following will be consulted regarding any subsequent planning application:

Consultee:- (Internal)

- Ward Councillors for Tokyngton (Brent)
- Environmental Health (Brent)
- Lead Local Flood Authority (Brent)

(External)

- Thames Water
- Greater London Authority (GLA)
- Transport for London (TfL)

- All existing properties and addresses within at least 100m of the application site.
- The wider community will be consulted through a site notice close to the property and a notice printed within the Brent and Kilburn Times local newspaper.

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

POLICY CONTEXT

12. 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.
13. London Plan consolidated with alterations since 2011 (March 2016)
14. Development Management Policies, London Borough of Brent (2016)
15. London Borough of Brent LDF Core Strategy 2010
16. Wembley Area Action Plan 2015
17. Supplementary Planning Guidance 17 'Design Guide for New Development' (2002)

MATERIAL PLANNING CONSIDERATIONS

18. The main issues relevant to this proposal are:
 - Principle of use and development
 - Scale, height, massing, layout and design of the development within its local context, including protected views
 - Impact on amenities of neighbouring properties
 - Transport
 - Environmental health considerations (contamination/air quality)
 - Microclimate, including wind environment
 - Sustainability – including energy and drainage

Issue 1

Principle of development

18. Cannon Trading Estate is located within Wembley Strategic Cultural Area as designated within the Wembley Area Action Plan (WAAP) (2015). As part of this designation, the area is identified as appropriate for leisure, tourism and cultural uses. The principle of educational use on part of the site is therefore supported by site allocation W28.
19. However, student accommodation is proposed as a part of the scheme. The number of student rooms in Wembley has already reached the level of the "cap" set out within policy WEM23 of the Wembley Area Action Plan and the provision of further student accommodation would not be in accordance with this policy. Whilst this is contrary to the development plan, unlike other student accommodation developments, it is proposed that this student accommodation would serve the institution that is to be situated on this site. Consideration is therefore given to the recent establishment of the UCFB as a Wembley Higher Education institution. It is considered that significant weight can be given to the benefits associated with the proposed provision of higher education facility and the associated benefits of providing student accommodation for students of that facility. It is considered that the applicant must demonstrate to the Council's satisfaction that this education institution generates sufficient demand for proposed student accommodation from its full-time students, and thus, the proposal should justify the number of student rooms that are proposed. The proposal would need to be treated as a departure from the development plan. However, it is considered that this departure can be justified by the benefits associated by the scheme providing the demand for the proposed number of student rooms can be justified.
20. An assessment of the likely demand for student accommodation associated with this educational institution should therefore be submitted with the application to support the proposals to demonstrate that the amount of student accommodation that is proposed is set at a level that will not go beyond the projected demand for this

education institution. Should consent be granted, the Council is likely to place a restriction on the student accommodation regarding the nature of occupation.

21. The remainder of the uses beyond the student accommodation are consistent with the aims of the W28 plot Site Specific Allocation, particularly in view of its designation as a 'cultural quarter'. However, alongside these cultural uses, the allocation requires the delivery of 1,500 homes across the wider Site Specific Allocation. The combined developments of Kelaty House and UCFB may hinder the ability to deliver 1,500 homes across the wider allocation, given that both of these developments are significant in their scale and coverage of the allocation and both void of private/affordable residential units. Nonetheless, it is noted that the Greater London Authority define residential homes/dwellings so as to include student accommodation and some limited weight can be given to this.
22. On balance, it is considered that there is a strong case for establishing a permanent university campus for UCFB and its associated student accommodation within this location, in spite of the principle concerns regarding the amount of student housing cap and the ability to deliver 1,500 homes across the wider SSA. Whilst significant amounts of student housing have already been delivered or consented within the WAAP area, it is noted that developments thus far have not been for educational institutions situated on the site of the student accommodation and have been for the use of students of Universities outside of Wembley. Therefore, the use of further student accommodation which is specifically tied to an intrinsically local institution can be supported in principle, despite the departure from Policy CP23 of the development plan.

Issue 2

Scale, height, massing, layout and design of the development within its local context, including protected views to Wembley Stadium

23. The main frontage as seen from the street is mostly glazed, although variety is achieved through its three distinct elements, with a heavily transparent and active lower level (first four storeys) and the taller element on the corner being strongly articulated by its balconies. The main façade of the frontage (4th floor and above) remains heavily glazed although is appropriately contrasted with dark render; together, these two materials form a 'tetris-like' pattern across the main frontage. This effect is visually striking and a set in from the front of the building has been provided which helps to soften its appearance in the wider context.
24. The three lower elements of the building to the east are to be mainly of brick construction, with a soft orange colour opted for. The brick facades are articulated by bright coloured window frames and rendered strips in between floors which wrap around the curved edges of the building on its northern side.
25. The site is identified in the Wembley Area Action Plan as sensitive to tall buildings (30 m tall or higher). It is not entirely clear whether the current proposal will fall below the threshold for tall buildings. However, the approach to height on the site and the way that the height of the proposed buildings relate to that of the Kelaty House extant consent is considered to be acceptable. The stepped approach to the height and massing is in line with the requirements of the WAAP, where it is set out that development within the W28 plot should step down from west to east to allow for an appropriate transition between the taller developments in the masterplan area and low rise industrial developments. The 6 storey low element to the east is considered to be of a scale which effectively relates to the neighbouring development to the east, whilst the front elevation is considered to achieve a suitable height that is not unduly dominant within the street. It will be important to ensure that the building respects the prominence of the adjoining Kelaty House development to the north. The Kelaty House development occupies the corner plot with Engineers Way and, unlike this development site, is identified within the WAAP as a site appropriate for tall buildings. As such, this building must appear subservient to it.

26. The application submission should depict the emerging context on the plans to confirm that the building would be appropriately suited to its surroundings. This emerging context should include the immediate development consented within the E03 plot of the Wembley Masterplan, across the road on the west side of First Way as well as Kelaty House to the north.
27. Policy WEM6 establishes a number of protected views to Wembley Stadium. The subject site is within or near to the viewing corridor to the arch of the stadium from two viewpoints, View 5 (Welsh Harp Reservoir) and 10 (Metropolitan & Jubilee Line north of Neasden Station). The locations of those view points are shown on Map 4.5 of the Wembley Area Action Plan. An assessment of the impact on the protected views from these location will need to be produced and provided to the Council for consideration and should accompany the application. Nevertheless, given the height of the adjoining developments (that has already been subject to views testing and analysis), it is considered likely that the proposed development will not unduly affect protected views to the Stadium.
28. At ground floor level, the front two elements of the building will contain the main university educational facilities, including an entrance room with meeting area, student services, seminar room, three adaptable auditoriums, two fixed seminar rooms, toilet facilities, coffee bar, library, IT suite and Learning Resource Centre. The offices and admin space associated with the university is to be contained above these facilities at first floor level. Above this, the start up office space will be located across the front of the building from floors 2-4. The residential parts of the building are contained at ground floor level (towards the rear of the building) along the main east-west arm of the building on the south side (studios, “dudios” and “trudios”) as well as within the three north-south arms (the larger flats with shared kitchens). The separations between the north-south arms of the building form ‘quad’ inspired open spaces for amenity use. From floor 5 upwards the building is solely student accommodation. The southern edges of the building at ground floor level contain some ancillary facilities, including security and storage room, two large bicycle store rooms, two laundry rooms, a refuse storage room, a gym for residents use and a large plant room at the rear.
29. With regard to landscaping, it is noted that the scheme includes planting within the pedestrian access adjacent to the northern boundary of the site and within the courtyards. Whilst ground level planting is promoted, these areas are directly to the north of tall elements of the building and within very confined spaces. They will suffer from significant levels of over-shadowing. The proposal does not include any tree planting within the frontage, which is considered essential to ensure an acceptable environment for the proposed uses and an appropriate setting for the building. It may be feasible to provide this in the form of street tree planting providing adequate footway widths can be maintained. Planting should also be incorporated along the southern side of the building, along the access road. Given the high proportion of the site proposed to be covered by buildings, green roofs should also be incorporated.
30. There are no policies which would require the Local Planning Authority to assess the layout and quality of university facilities or student accommodation and there is therefore no objection in principle to the layout proposed within the pre-application documents. However, policy DMP20 sets out that proposals for student accommodation (and other accommodation with shared facilities) should be of an acceptable quality meeting appropriate standards for the needs of its occupants, including external amenity space and appropriate communal facilities. Application submissions should therefore normally demonstrate that the proposed standard of accommodation is sufficient to meets the requirements of the particular group (in this case, students).
31. In accordance with London Plan policy 3.8, there is a requirement for 10% of the student rooms to be wheelchair accessible and applications to be accompanied by an

Accessibility Management Plan. This is distinct from a Design & Access Statement and guidance on the content can be found in the Mayor's SPG. The accessible units are normally provided as a mixture of adaptable and fully accessible units.

Issue 3

Impact on amenities of neighbouring properties

32. The site sits between the approved residential development to the west and the industrial uses in Wembley Strategic Industrial Location to the east. The adjoining sites will also be redeveloped over time and are likely to include other sensitive uses. The development must accordingly respond to the existing context and the likely future context. 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 the submission must demonstrate that an acceptable environment can be achieved.
33. The site is coming forward in isolation from the adjoining development sites within the site allocation. Whilst there is no objection to this in principle, the submission should demonstrate that the proposed redevelopment of this site does not prejudice the development potential of adjoining sites. A key part of achieving this will be ensuring that a separation of at least 10m is established from the built form of the development to the northern, southern and eastern site boundaries so as not to prejudice the redevelopment of the surrounding land. In some locations (e.g. the frontage), a separation of less than 10 m from the northern and southern boundaries may be acceptable providing there are no windows facing that boundary.
34. The proposal will also need to be considered in terms of its impact on any nearby residential units, including those within the emerging context (e.g. within plot E03). A sunlight and daylight assessment, carried out in accordance with BRE guidelines should be commissioned and should accompany any application to consider the impact of a development of this scale on the surroundings. Regard will be given to the dense urban form of the development in this area.

Issue 4

Transport

35. The site is within the Wembley redevelopment area, so future development needs to comply with the WAAP. It has moderate access to public transport services (PTAL 3) and is not currently located within a CPZ (other than on Wembley Stadium event days). First Way is currently a one-way street (northwards) with two traffic lanes, but there are proposals in the Wembley Area Action Plan to convert it to two-way flow. On-street parking and loading in the road are prohibited at all times.
36. Vehicular access is currently provided to the site (which currently comprises five warehouse units) via a 10m wide road along the southern side of the site. The junction with First Way has a 10m radius on its north side and a 4m radius on its south side. This road also provides access to an adjoining warehouse (Latif House) to the south.
37. The proposal looks to retain a road along the southern side of the site to provide seven parallel parking spaces and two disabled spaces at its far end. This level of parking provision accords with standards for the proposed office space, and no parking is required for the University or student accommodation. A parking permit restriction (where future occupants are not eligible for on-street parking permits) will be required to mitigate the potential for over-spill parking.
38. However, the road is shown with a width of just 3 m (not sufficient for two cars to pass one another), widening to 4.8m where parking spaces are proposed, which is also not sufficient for parallel parking. Even with this substandard width, the road encroaches beyond the southern site boundary. No turning area is indicated at its far end either for service vehicles, which is even more of a concern when the servicing of Latif

House from the road is considered too. A servicing bay for the offices and university will also need to be accommodated within the site.

39. In principle, the retention of a road along the southern side of the site to serve limited parking and servicing is acceptable. However, the access road as shown is not sufficiently wide and it would need to be of an appropriate standard that is fit for purpose, whilst adequate servicing, parking (including extensive bicycle parking) and turning will need to be incorporated into the layout. The site layout as submitted does not provide an appropriate access.
40. A 3 m pedestrian route is proposed along the northern side of the site, which would in future effectively form a footway to the access road approved for the adjoining Kelaty House development (ref: 16/1435). As with the Kelaty House development, the right of Brent Council to call on the dedication of this footway as public highway in the future should be secured. In addition, space for a potential further route along the eastern side of the building, joining the access road to the Kelaty House road, should be reserved (again with the potential to be called for adoption as highway in the future). This will require repositioning of the plant room to provide adequate space, but might save space in terms of trying to accommodate a suitable turning head. It is recommended that the development is co-ordinated with that for Kelaty House in terms of securing access around the site.
41. The proposed changes to First Way for two-way flow should not affect the site, but the kerb radii at the junction with First Way should be reduced and tactile paving added.
42. As a major future destination, the need for improved pedestrian crossing facilities on First Way should be considered. This should be picked up in a Transport Assessment for the development, which should include a PERS Audit. A Travel Plan will also be required, along with Delivery & Servicing Plan and a Construction Logistics Plan.
43. Transport for London are looking to increase bus penetration to the east of the stadium by re-routing buses, extending bus routes and increasing bus frequency. These measures will increase the PTAL for many locations to the east of the Stadium and are considered essential to support the density of development envisaged within the Wembley Area Action Plan. TfL typically seek to secure contributions towards these improvements to bus services and in some instances, bus infrastructure, for all Major Developments within Wembley. They are accordingly likely to require a contribution to mitigate the impacts of this proposal.
44. In conclusion, the proposed level of parking is considered to be acceptable, but more detailed consideration of the access arrangements in and around the building and how they relate to adjoining sites and developments is required before a planning application is submitted. Servicing provision is also required.

Issue 5
Environmental Health
Noise

45. The proposed site is within a commercial/ industrial area in close proximity to the Wembley Stadium. Therefore there are a number of existing noise sources that need to be taken into account as well as introducing new noise sources.
46. Existing noise sources from Wembley Stadium as well as surrounding industrial uses and road noise need to be taken into account and therefore a noise assessment will be required to be submitted to demonstrate that recommended internal noise levels (as per BS8233:2014) can be achieved. In addition the noise assessment should consider low frequency noise from the use of the stadium for music events.

47. As well as these existing noise sources the development proposes new noise sources that will be introduced. These include gym and fitness facilities and an auditorium. The planning application should take account of these noise sources and ensure that the noise assessment includes details of the appropriate sound insulation between floors to ensure that the noise from the auditorium and the fitness centre does not impact on the proposed residential uses.
48. The noise assessment should also consider noise from plant/machinery associated with the development as well as plant/machinery from the surrounding existing uses. This assessment should be in line with BS4142:2014.
49. The above details can be submitted at application stage or as details pursuant to a condition.

Air Quality

50. The proposed site is within an air quality management area and therefore due to the size of the development the applicant is required to carry out an air quality impact assessment that should consider the potential emissions to the area associated with the development as well as the potential impact on receptors to the development. In addition to an air quality impact assessment, the GLA require that all Major Developments within London be Air Quality Neutral. As such, an Air Quality Neutral Assessment will need to be undertaken in accordance with guidance published by the Greater London Authority (GLA). The assessment shall include mitigation proposals should it be found that the development is not air quality neutral.

Contaminated Land

51. The proposed site has been highlighted as potentially contaminated and therefore conditions will be attached that require a site investigation to determine the nature and extent of any soil contamination as well as an appraisal of remediation options if contamination is considered to be a risk.

Construction Noise and Dust

52. The development is within an Air Quality Management Area and located very close to other industrial and commercial premises. Demolition and construction therefore has the potential to contribute to background air pollution levels and cause nuisance to neighbours.
53. A Construction Method Statement therefore will be required through condition.

Asbestos

54. Given the age of the building to be demolished it is possible that asbestos may be present. The applicant should be reminded of their duties under the Control of Asbestos Regulations and must ensure that a qualified asbestos contractor is employed to remove all asbestos and asbestos-containing materials and arrange for the appropriate disposal of such materials.

Odour

55. If the proposed use is due to have a commercial kitchen this could cause issues with odour to surrounding premises if appropriate odour extraction is not installed. In this instance, details of the extract ventilation system and odour control equipment for the commercial kitchen, including all details of external ducting, must be submitted to the Council, either up front with the application or as details pursuant to a condition following approval.

Issue 6

Microclimate, including wind environment

56. The application should be accompanied by an assessment of the wind environment and the potential impacts of the proposal on the local wind levels.

Issue 7

Sustainability – including energy and drainage

57. 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.
58. Policy CP19 of the Brent Core Strategy requires all non-residential schemes to achieve a BREEAM level of at least "Excellent".
59. The Wembley Area Action Plan promotes the provision of a district wide heat network and proposals for all Major Developments in this area should demonstrate how the scheme can be easily connected to such a system should one be introduced in the future.
60. The proposal should also be accompanied by proposals for the treatment of surface water, including the consideration of the use of Sustainable Urban Drainage Systems in accordance with London Plan Policy 5.13.

PLANNING OBLIGATIONS

61. 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:
 - 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 and monitor the construction of an east-west pedestrian link along the southern side of the site forming part of the Wembley Area Action Plan. Any development will need to accommodate this link and construct it to a high quality standard, so that it can be adopted in future once a connection through to Second Way is completed.
 - To offer identified access adjacent to the Kelaty House site for adoption by Brent Council.
 - To ensure that the student accommodation is only occupied by full time students of UCFB, unless they cannot be occupied after a certain period.
 - To provide a financial contribution towards the rerouting of local bus routes through the area.
 - To secure any other financial contributions that may be required by the Council.
 - Any other obligations required (at this time not known).
62. This would be development that is liable to pay Mayoral and Brent Community Infrastructure Levy (CIL). The CIL payment breakdown is as follows
 - Educational uses are exempt from CIL charges. As such, the university education facilities would not attract a CIL charge.
 - The office space of the building would be liable for CIL payment with a Brent charge of £40/sqm and a Mayoral charge of £35/sqm.
 - The student accommodation space (and associated ancillary spaces, such as the gym) within the building would be liable for CIL payment with a Brent charge of £200/sqm and a Mayoral charge of £35/sqm.

- If the existing floorspace of the building has been in use for at least 6 of the previous 36 months then the existing floorspace can be deducted from the total proposed floorspace resulting in a proportion of the proposed building that will be exempt from a CIL charge.

N.B: All charges/sqm refer to gross internal area (GIA).

CONCLUSIONS

63. 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.