

Wembley Area Action Plan ISSUES & OPTIONS



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A new plan for Wembley

A new plan for Wembley

Brent Council is preparing a new Plan for Wembley which will determine how the area develops over the next 15 years. This is your opportunity to tell us the sort of place you want Wembley to be in the future.

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

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

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Introduction 1

1 Introduction

What is the Wembley Area Action Plan?

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

1.2 The Council's Core Strategy, adopted in 2010, sets the context for development of the Wembley Area by establishing a vision for the future of the borough as a whole, a set of objectives to be achieved by development and a set of core policies to achieve those objectives. For this reason, much of the vision and most of the objectives for Wembley are already established and are incorporated in the vision and objectives for Wembley set out in section 2 below. In addition the Site Specific Allocations DPD, adopted in 2011, has established the planning guidance for some of the development sites. It is intended that relevant site guidance will be carried

forward into the Area Action Plan and supplemented by new or reviewed planning guidelines for the remaining key opportunity sites in the area. The plan will supersede policies and proposals currently included in the Wembley Regeneration Area chapter of the Brent Unitary Development Plan 2004. The Wembley Masterplan, which deals with the 70 hectare main regeneration area around the stadium, will continue to provide detailed planning guidance on matters such as scale and massing, the public realm, streetscape and design quality for this area. In addition, the Wembley Link SPD will provide similar guidance for the development of the eastern end of the High Road and the Wembley West End SPD will guide development on the Curtis Lane car park site behind the High Road.

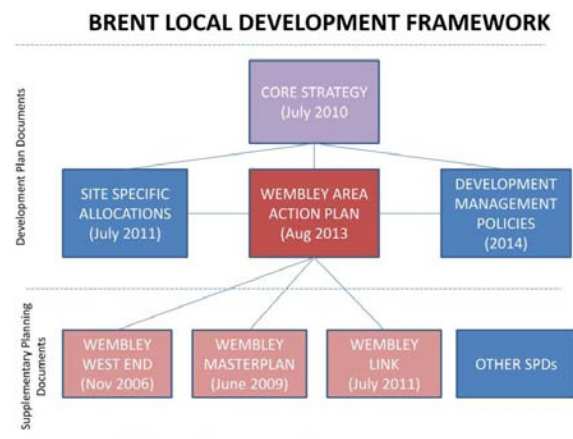
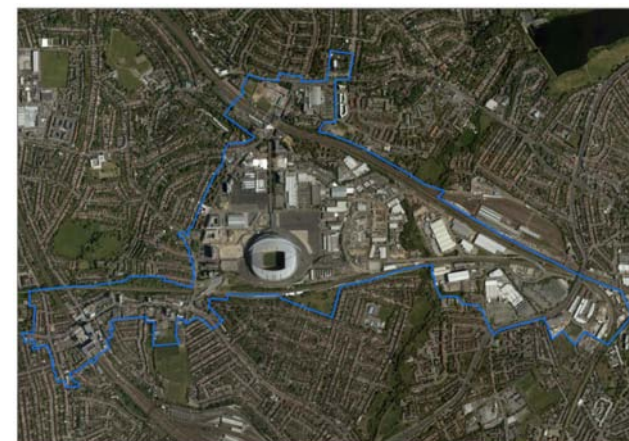


Figure 1.1 LDF Diagram

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



Picture 1.1 Area Action Plan boundary

Introduction 1

How does the “Issues and Options” consultation stage fit into the process of preparing the AAP?

1.4 This round of consultation is the first stage of public consultation on the proposed Plan. This document highlights what are seen to be the key planning issues relating to the future of the Wembley area and proposes a number of options for dealing with those issues and resolving any challenges or problems that may have been identified. The Council has also provided some information about what it thinks are the potential implications of different courses of action. In addition, a Sustainability Appraisal has been carried out to assess, in general terms, the sustainability of each of the options. A report setting out the appraisal results is also available as part of the consultation.

1.5 Views are being sought on what people's preferred options are for taking the Plan forward. The Council would also like to know whether there are issues that have not been identified that should also be addressed by the Plan. In order to help people respond to the consultation, a simple questionnaire has been included at appendix 1 of this document. Separate copies of this are also available.

1.6 Once views and comments have been received, then these will be taken into account in preparing a draft Plan. This draft Plan is scheduled for a further round of public consultation early in 2012 where comments made will, once again, be

taken into account before the Plan is published and submitted to Government for examination in public. It is anticipated that the Plan will be adopted in 2013.

1.7 Part of the process of preparing the Plan is the gathering of information or evidence to provide justification for the policies and proposals. The evidence base in support of the Plan has largely been compiled, in support of the Core Strategy and Site Specific Allocations DPD's, and is available for viewing on the Council's website at www.brent.gov.uk/ldf. Further information relevant to the Plan will be added as this becomes available.

Finding your way around this report

1.8 The report is arranged into different sections:

- An explanation about what the Area Action Plan is and how you can get involved is in section 1
- What will Wembley be like in 2026? How a vision and a set of objectives for the area will be created is in section 2
- An explanation of the main planning issues and the options for dealing with with these is set out by topic area in sections 3 - 10
- A questionnaire is included as appendix 1

How to respond

1.9 There is a short questionnaire in the appendix to this document which you can fill in and return to the address on it. Separate questionnaire forms are also available from council libraries, one stop service offices and online. Alternatively, you can respond

to any aspect of the issues and options document online by using the consultation tool or just send in your comments on the future of Wembley by e-mail or in writing to the addresses shown on page 1. We would particularly like to know whether you think the issues identified are the right ones and which policy options you think are the right options. Let us know as well whether you think there are issues that have not been identified which should be addressed by the Plan.

1 Introduction

Vision and Objectives for Wembley 2

2 Vision and Objectives for Wembley

2.1 It is important that the council develops a realistic vision as to what Wembley should be like in 15 years time. The council has developed a vision for Brent as a whole, in the Core Strategy, and a separate vision for the key redevelopment area around the stadium. The council's vision for the growth area was launched in 2002 in the document "Our Vision for Wembley, and was refreshed in 2007 with the launch of the "Vision to Reality" corporate document. They will form the basis of a wider Wembley vision for the whole of the area covered by the Area Action Plan.

Brent (Core Strategy)

In 2026, Brent will :

- *be a dynamic London Borough, with a new and iconic Wembley at its core providing new jobs, homes, retail & major leisure attractions.*
- *retain its industrial and manufacturing sectors by providing modern, upgraded premises in a quality environment.*
- *be a borough of opportunity, maximising the potential of its youthful population through new and improved education and training facilities.*
- *provide a range of homes that are affordable and meet the needs of its diverse communities.*
- *be a healthy & safe place to live, benefiting from high quality urban design, attractive open spaces, first class sports facilities, and green and safe walking and cycling routes.*
- *host inclusive community and cultural facilities which enable the full participation of its diverse communities.*

- *retain its smaller centres which provide important local services to their immediate area.*
- *be fully integrated into the city with excellent public transport interchanges and connections to other strategic centres in London.*
- *use energy and resources in an efficient & sustainable manner, playing its role in addressing the global challenge of climate change.*

Wembley

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

Objectives

2.2 The draft objectives for Wembley will build on the Core Strategy's vision for the area, and set out in more detail how the council aims to achieve its objectives for Wembley. The objectives are shown below by theme.

Regeneration through leisure, sport and mixed use development

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

Town centres, shopping and existing and new uses

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

Modern, service based economy

Vision and Objectives for Wembley 2

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

Promoting Wembley as a global and distinctive tourist destination

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

People's needs and associated infrastructure

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

deficiencies and to meet the needs of new population.

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

Housing Needs

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

Promoting improved access and reducing the need to travel by car

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

Protecting and enhancing the environment

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

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

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

2 Vision and Objectives for Wembley

Urban Design & Place Making 3

3 Urban Design & Place Making

Background

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

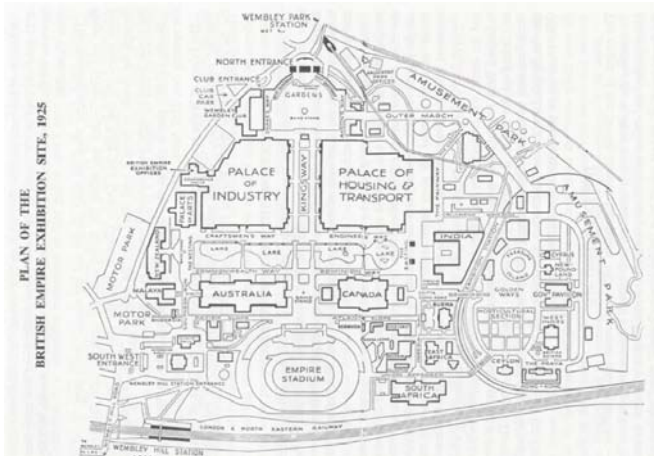


Figure 3.1 Plan of British Empire Exhibition

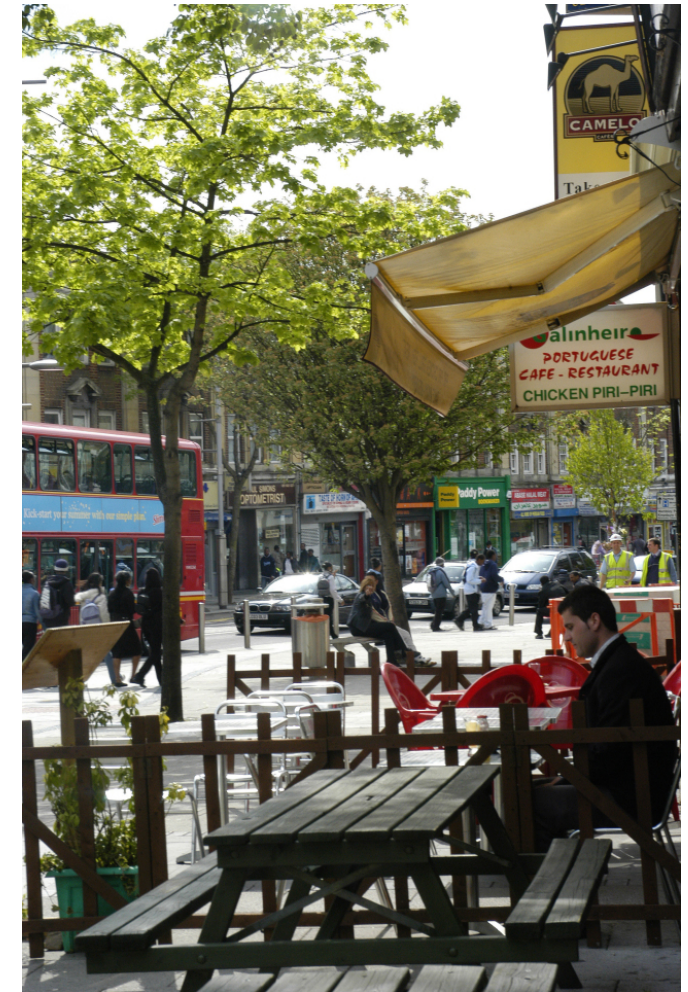
3.2 The Empire Exhibition closed in 1925 and subsequent development has slowly moved away from the Exhibition layout. The historic east-west grain is still in evidence, particularly along Engineers Way and Fulton Road but the park has been lost and the formal ceremonial route to the Stadium – Olympic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

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



Picture 3.1 Wembley Stadium & Industrial Estate

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



Picture 3.2 Wembley High Road

3.5 Wembley Town Centre, at its height in the 1960's is now the product of years of decline, and the gradual loss of major retailers has created a limited shopping environment. However, recent

Urban Design & Place Making 3

improvements to the public realm and the approval and build out of a series of large scale planning applications have added to the climate of change in Wembley. The town centre is now experiencing higher development pressures but this is often occurring on a piecemeal, ad hoc basis.

Buildings of Historic or Architectural Merit

3.6 The AAP area does not have a significant amount of historic buildings or buildings that are considered to be of an exemplary architectural quality. There are three buildings within the AAP area that are considered to have significant historic or architectural merit.



Picture 3.3 The Empire Pool (Wembley Arena) Grade II

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



Picture 3.4 Wembley National Stadium

Regeneration Context

3.8 In 2004 the London Borough of Brent granted outline planning permission to Quintain Estates and Development plc for a major mixed-use regeneration scheme covering 42 acres of land surrounding the new Wembley Stadium. Much of the approved scheme within Stage 1 is still to be delivered, including some of the planning obligations attached to the phased delivery of the development.



Picture 3.5 Quintain Estates Stage 1 scheme

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



Picture 3.6 Quintain Estates NW Lands scheme

Dexion House (Permission)



Malcolm House/Fulton House (Permission)



Crescent House (Permission)



Victoria Hall (Under Construction)



Karma House (Permission)



Ada Lewis House (Complete)



Elm Road (Complete)



Shubette House (Under Construction)



Central Square (Stage 1 Complete)



Elizabeth House (Under Construction)



Civic Centre (Under Construction)

Other Major Developments in Wembley



Urban Design & Place Making 3

Relevant Core Strategy Policies**Policy CP5**

3.10 The contribution towards the creation of a distinctive place with a positive sense of identity which is well connected and accessible. Consideration of the heritage of the area and investigate means of introducing continuity through urban design measures and the possibility of reusing and restoring buildings of merit.

Policy CP6

- Where design is of the highest or exemplary standard, higher densities will be considered
- Higher densities may be acceptable where PTAL levels would be raised as a result of development or through committed transport improvements
- The site should contribute towards wider public realm improvements commensurate with the scale of development
- Development in growth areas should take into account the suburban interface
- Tall buildings are acceptable in the Wembley

Policy CP7

3.11 Wembley will drive the economic regeneration of Brent. It will become a high quality, urban, connected and sustainable city quarter generating 10,000 new jobs across a range of sectors including retail, offices, the new Brent civic centre, conference facilities, hotels, sports, leisure,

tourism and visitor attractors, creative and cultural industries and education facilities reflecting its designation as a Strategic Cultural Area for London.

3.12 As identified on the Proposals Map, Wembley town centre will be extended eastwards to facilitate a further 30,000sqm net of new retail floorspace in addition to that already granted planning consent.

What is the appropriate character & urban form for Wembley?

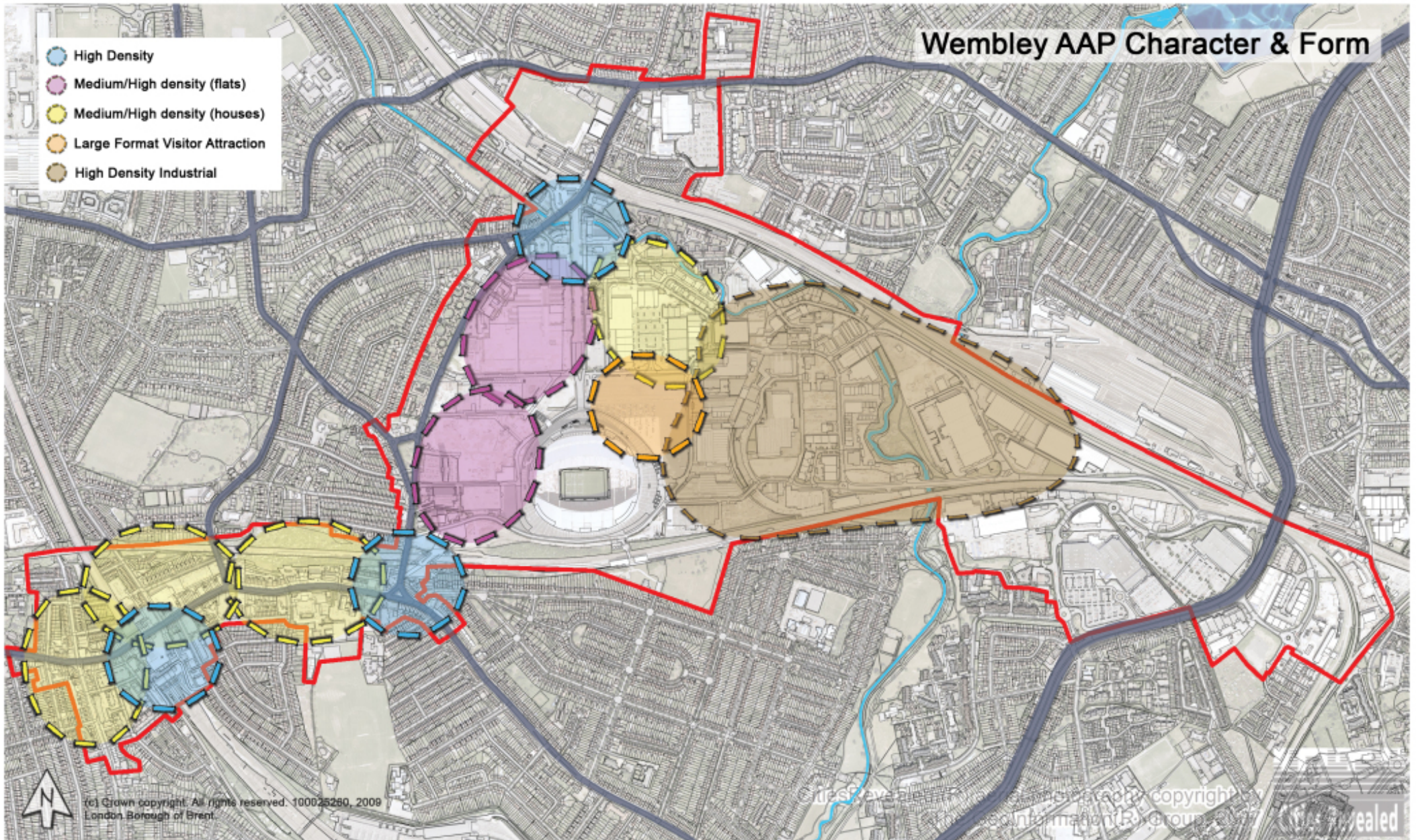
3.13 The vast amount of development already undertaken or given permission is of a similar scale and typology (larger blocks of predominantly 1 & 2 bed flats). If Wembley is to become a truly sustainable and attractive place to live, there needs to be more variety in the built fabric in order to fulfil the vision of a mixed community.

Options UD 1

1. Continue to allow the market to dictate form
2. Allocate some general areas for different types of development i.e. family houses in the north east stadium area or around the High Road.
3. Be prescriptive about specific locations and a range of building typologies that would be acceptable in such locations

Potential Implications UD 1

1. Simply because a certain type of development is financially viable does not necessarily indicate that it is the best form of development in an area. Wembley could end up with a transitional population of younger people who then find it difficult to stay in the area due to lack of diversity in accommodation. Alternatively, the over provision of smaller units may reduce demand, leading developers to pursue the creation of different types of accommodation such as larger family houses.
2. If appropriate areas are identified for certain forms of development this should lead to a co-ordinated and rational approach to the form and character of the area over time. However, the Council owns very little land within the area, so there will be significant limits on how prescriptive it can be.
3. There will be logical places where certain forms of development will be more appropriate than others, however there is a risk in being overly prescriptive as there are many different permutations of building form.



This Diagram indicates a range of potential options for the character and form of development across the Wembley area

Urban Design & Place Making 3

How can the approaches/gateways to Wembley be made more attractive to visitors?



Picture 3.9 Wembley Park Station

3.14 Significant improvements have already been made to key nodes/gateways (3 stations) but there are a number of other potential gateways that could be significantly improved (Triangle junction, Stadium Access Corridor, Ealing Rd/High Rd).

Options UD 2

1. Continue to focus on the three stations
2. Produce a strategy to enhance other entrance points into the area



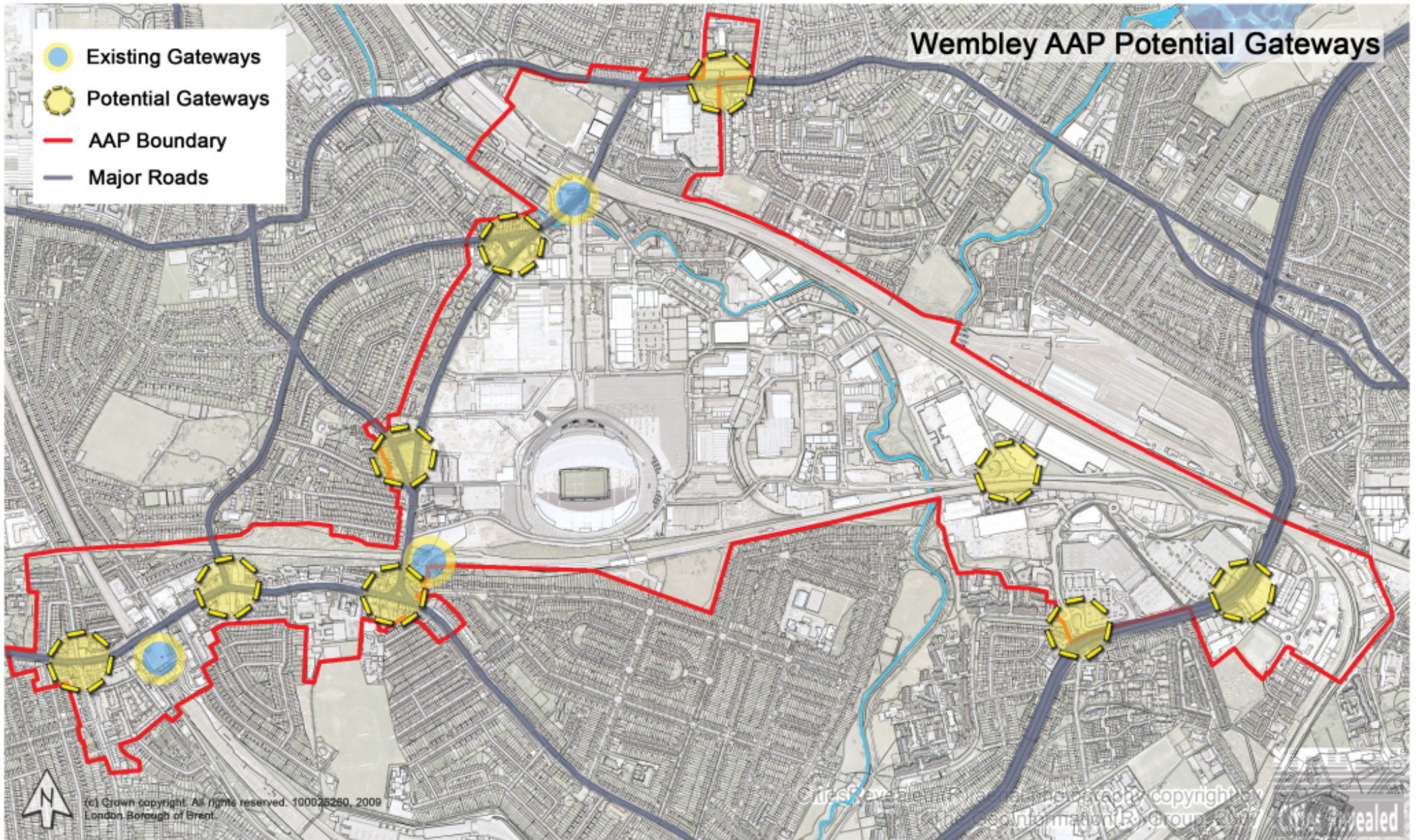
Picture 3.10 Artists impression from 2009 Masterplan



Picture 3.11 Stadium Access Corridor

Potential Implications UD 2

1. Although there have been significant improvements to the three stations, there still needs to be more work undertaken at these arrival points, particularly Wembley Stadium Station. However, a significant amount of people (on both event days and non-event days) arrive in the area by bus, car or other modes of transport and the experience of coming to Wembley should equally cater for these people.
2. A coherent strategy for the enhancement of all gateways into the area could help to define perceptions of the area as a whole and begin to develop a strong identity for the area. However, looking to invest in a wider amount of entrance points into the area could potentially lose the focus that has been built up around the three stations.



This Diagram indicates a number of potential gateways that could be enhanced across the Wembley area

Urban Design & Place Making 3

Where in Wembley are tall buildings appropriately located and what should the maximum height be?

3.15 The Wembley Masterplan identifies indicative building heights and a range of locations for tall buildings (over 30m) including 3 locations for buildings of 15-20 storeys (approx 45-75m). The approved Quintain Stage 2 represents some significant departures from this. The Wembley Link SPD advocates a fresh approach to building heights within the town centre whereby a number of taller buildings will be considered at key locations - none of which should be higher than Wembley Central.

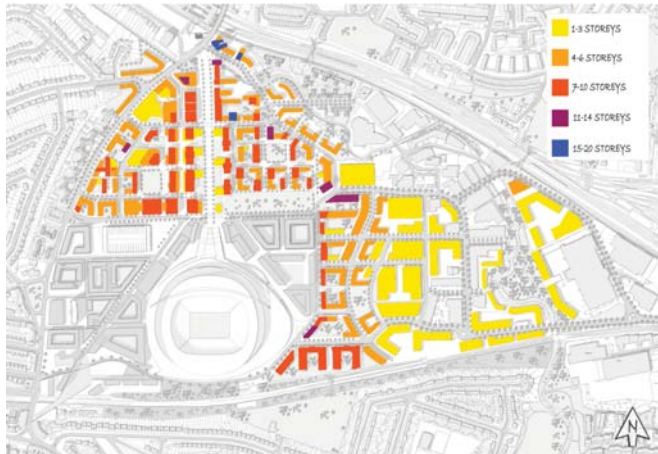


Figure 3.2 Indicative building heights

Options UD 3

1. Produce a comprehensive tall buildings strategy for the entire AAP area.
2. Continue with the indicative images and loose guidelines set out in SPDs.

Potential Implications UD 3

1. The production of a tall buildings strategy should help to provide a co-ordinated approach to development across the area, although it could also be seen as stifling development potential.
2. The images in the 2009 Masterplan provide guidance on building heights, however the most recently approved outline permission for Quintain Stage 2 NW Lands are significantly higher in many places, therefore such guidelines are not appropriate for future development.



Picture 3.13 Wembley Central Square Development

3 Urban Design & Place Making

Is there a need to review the design code for Olympic Way?

3.16 The Wembley Masterplan puts forward a

design code for the buildings either side of Olympic Way and suggests some clear aspirations for the detailed design of perhaps the most important street

in the borough. In light of the approved Quintain permission it may be necessary to review the aspirations for Olympic Way.

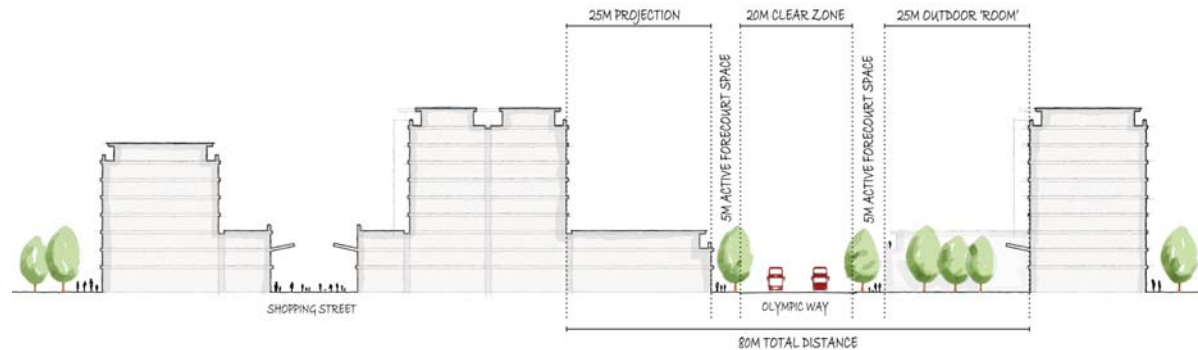


Figure 3.3 Design code for Olympic Way

Options UD 4

1. Review and strengthen the design code for Olympic Way.
2. Continue to use the Masterplan as guidance for development in this location.



Picture 3.14 Artist's impression of Olympic Way

Potential Implications UD 4

1. Reviewing the design code in light of approved planning permissions would allow for a co-ordinated approach to development based on what is now likely to be built out. However, design codes are often considered to be highly restrictive and inflexible.
2. The approval of the Quintain Stage 2 NW Lands application is significantly different from the parameters set out within the Masterplan, therefore the existing design code is effectively redundant

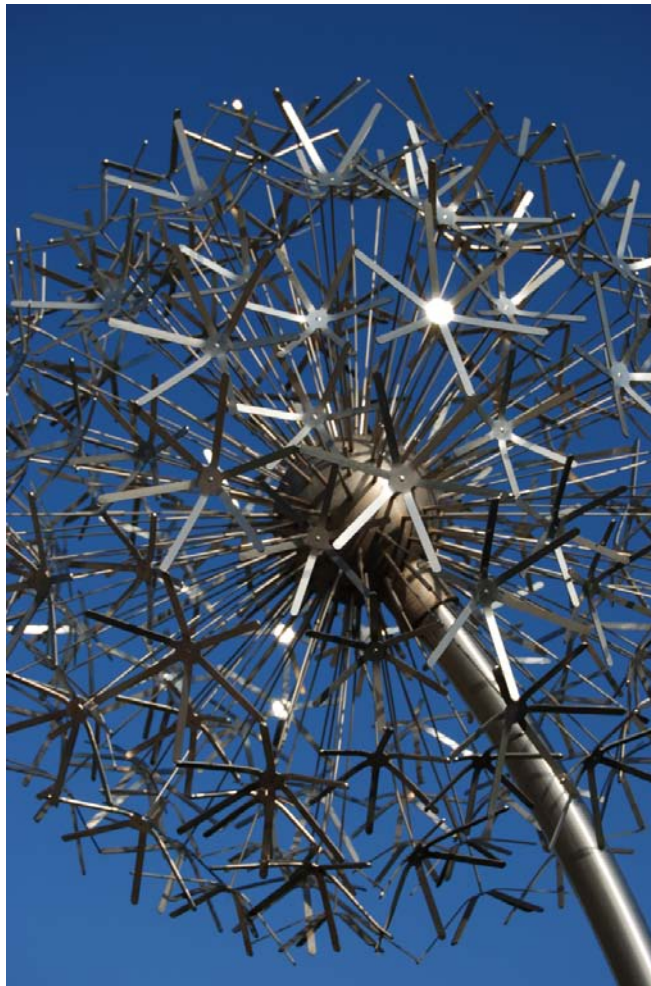
Urban Design & Place Making 3

Should the Plan include a public art strategy and what should this comprise?

3.17 The Masterplan seeks to secure one significant permanent artwork or installation within each district. There may be a need for a co-ordinated public art strategy across the AAP area and for this to be included in the Development Plan.



Picture 3.15 Sculpture Next to Wembley Park Station



Picture 3.16 Public Art Near River Brent

Potential Implications UD 5

A public art strategy would provide direction to all parties as to the expectations for public artworks across the area.



Picture 3.17 Public Art

Options UD 5

1. Produce a public art strategy
2. Do not produce a public art strategy

3 Urban Design & Place Making

Should the Plan include a public realm strategy and what should this comprise?



Picture 3.18 Wembley High Road

3.18 There are a number of different localities (Wembley town centre, Stadium area, industrial estates) across the AAP area that have different characteristics in relation to built form and street scene. There is currently nothing (other than the Stadium) that defines the area as a whole.

Options UD 6

1. Seek to use a palette of materials (lighting, furniture etc.) for all localities across the area.
2. Seek to reinforce the differences of each locality by using different materials.

Potential Implications UD 6

1. Using a consistent palette of materials across the entire area could help to reinforce the character of the area as a whole. However, the range of uses and different operational needs in different localities may make this approach rather difficult to implement.
2. Due to the scale of the area and the character of different localities, the creation of variety across the AAP area could create more interest and diversity.



Picture 3.19 Bespoke Street Furniture Used to Create a Distinctive Character

Urban Design & Place Making 3

Should the Plan seek to secure the quality of materials and detailing of development at an early stage?



Picture 3.20 Achitectoral Detailing

3.19 All too often, the quality of materials used in the final build out of development is reduced significantly after planning permission has been granted. The 2009 Masterplan aspires to secure quality detailing at an early stage of the design process in order to avoid such 'value engineering'.

Options UD 7

1. Secure detailed design specifications at planning stage.
2. Continue to work under the current system.



Picture 3.21 Simple palette of materials and high quality detailing of housing at Accordia, Cambridge

Potential Implications UD 7

Securing detailed specifications as part of the planning consent would give all parties the confidence that the quality of the final buildings

would remain high. Although this approach could be seen to impose unnecessary restrictions on applicants.



Picture 3.22 A well detailed contemporary home extension

3 Urban Design & Place Making

Business, industry and waste 4

4 Business, industry and waste

4.1 There have been substantial changes in the nature of businesses operating in Wembley over the last 20 or more years, with a significant decline in the amount of office space available as office buildings have converted to other uses, together with a decline in manufacturing and other industrial activity. There has been a consequent reduction in office and industrial employment. The retail sector and other services have not experienced the jobs growth that many other parts of London have so, overall, employment levels have fallen. Brent's Employment Land Demand Study 2009 estimated the likely demand for employment land across Brent up to 2026. It concluded that 13 hectares of land could be released from the existing stock of 266 hectares across the borough.

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

4.3 It is not possible to separately estimate the changes in employment across the industrial area (SIL). However, this is likely to have declined over the past 20 years or so as industrial activity has reduced and sites have increasingly been given over to open storage and similar uses. The level of waste management undertaken in the industrial area has

also increased and may be reaching a level where it is impacting upon Wembley's regeneration prospects.

4.4 Road access to the industrial area has improved now that the new estate access corridor linking to Great Central Way is open so that businesses in most of the area can benefit from a minimum of interference from events at the Stadium and Arena. However, there remain problems for those operations which are located adjacent to the Stadium or which have direct access from the one way system along Fourth and Fifth Way.



Picture 4.1 South Way approach to Wembley

Core Strategy Objectives

Objective 1

To promote economic performance & regeneration - by

- Creating five main growth areas of mixed use, mixed tenure development, the largest being Wembley which will be the main focus of new retail and town centre uses, expanding the town centre eastwards into the Stadium area
- 10,000 new jobs within the Wembley Area over 20 years, half of which will be created by 2017
- Completing three large scale hotels in the Wembley area and one large regional visitor attraction[A1]
- Increasing newly approved retail floorspace in Wembley by 25%

Objective 2

To meet employment needs and aid the regeneration of industry and business - by

- Working with developers and end users to offer suitable training and job placement opportunities
- Ensuring that sufficient sites and premises are available in the borough's main commercial areas...and that industrial/warehousing floor-space is renewed

Business, industry and waste 4

Relevant Core Strategy Policies

Policy CP7 states that Wembley will generate 10,000 new jobs across a range of sectors.

Policy CP20 – Wembley is identified as a Strategic Industrial Location (defined on the Proposals Map 2004) which are protected for industrial employment uses characterised by use classes B1, B2 and B8 or uses that are closely related. Purpose built offices are promoted in the Wembley Area subject to the sequential approach to development.

Strategic Industrial Location (SIL)

4.5 The boundaries of the SIL, immediately to the east of the Wembley Growth Area, were set in 2004 when the UDP was adopted. There has been substantial change since then, not only locally in terms of the use and occupation of land in the industrial estate, but also in terms of the demand for industrial premises and land as a result of the national economic downturn. By 2009 vacancy levels in the SIL had increased by over 25% to 7.8 h from 6.2 h in 2003. In addition to this, it is also clear that substantial areas of land are underused, particularly in terms of the level of employment provided. For example, a number of large sites are now given over to open storage, builders yards or waste transfer, especially construction waste, some without planning consent. The area of land accommodating such uses has increased from 1.71 h in 2003 to 3.16 h in 2009.

Should some land currently designated as SIL be de-designated, and released for other uses, and if so, how much?

4.6 Whilst it is acknowledged that there will be a continuing need to retain the vast majority of SIL in the borough, it should also be recognised that the de-designation of some employment land could be beneficial in promoting jobs growth locally if land is redeveloped for mixed use development, as with key parts of the regeneration area to the west. In addition, there are concerns that the proximity of industrial sites, and associated bad neighbour uses, to key regeneration sites is harming their development prospects because of the potential environmental impacts upon them. There is a particular concern that the juxtaposition of the industrial estate with proposed sensitive uses, such as a proposed new primary school on Fulton Road, will have an impact on the attractiveness of the school.

Options BIW 1

1. Leave the extent of the SIL as currently defined.
2. Introduce policy whereby development proposals adjacent to SIL should have regard to the potential effectiveness of these locations
3. De-designate SIL immediately adjacent to key sites identified for regeneration which

will include residential or other sensitive uses.

4. De-designate substantial part of the SIL to facilitate wider regeneration and environmental improvement.

Potential Implications BIW 1

1. On current trends there would be more than sufficient land to meet potential demand from industry, warehousing and other closely related uses, but with little additional job creation. Bad neighbour uses would remain close to important regeneration sites.
2. Likely to restrict options for certain key regeneration sites adjacent to SIL, as these may conflict with operation of industry, etc.
3. Reduction in land for industry, warehousing and closely related uses, but ability to bring forward sites for mixed use development or sensitive uses (such as schools) enhanced.
4. Potential significant loss of existing businesses for alternative uses together with conflict between operation of remaining businesses and new mixed use development.

4 Business, industry and waste

What proportion of land in the SIL should be given over to 'bad-neighbour' uses such as waste management?

4.7 There is a general view that if a significant proportion of land is occupied by uses such as open storage, aggregate depots and waste management, this will have a negative impact upon the regeneration potential of the wider area and will provide only a limited number of jobs. One way of dealing with the problem, especially to prevent it getting any worse, is to put a limit on the amount of land devoted to such uses.



Picture 4.2 Waste management site, Fifth Way



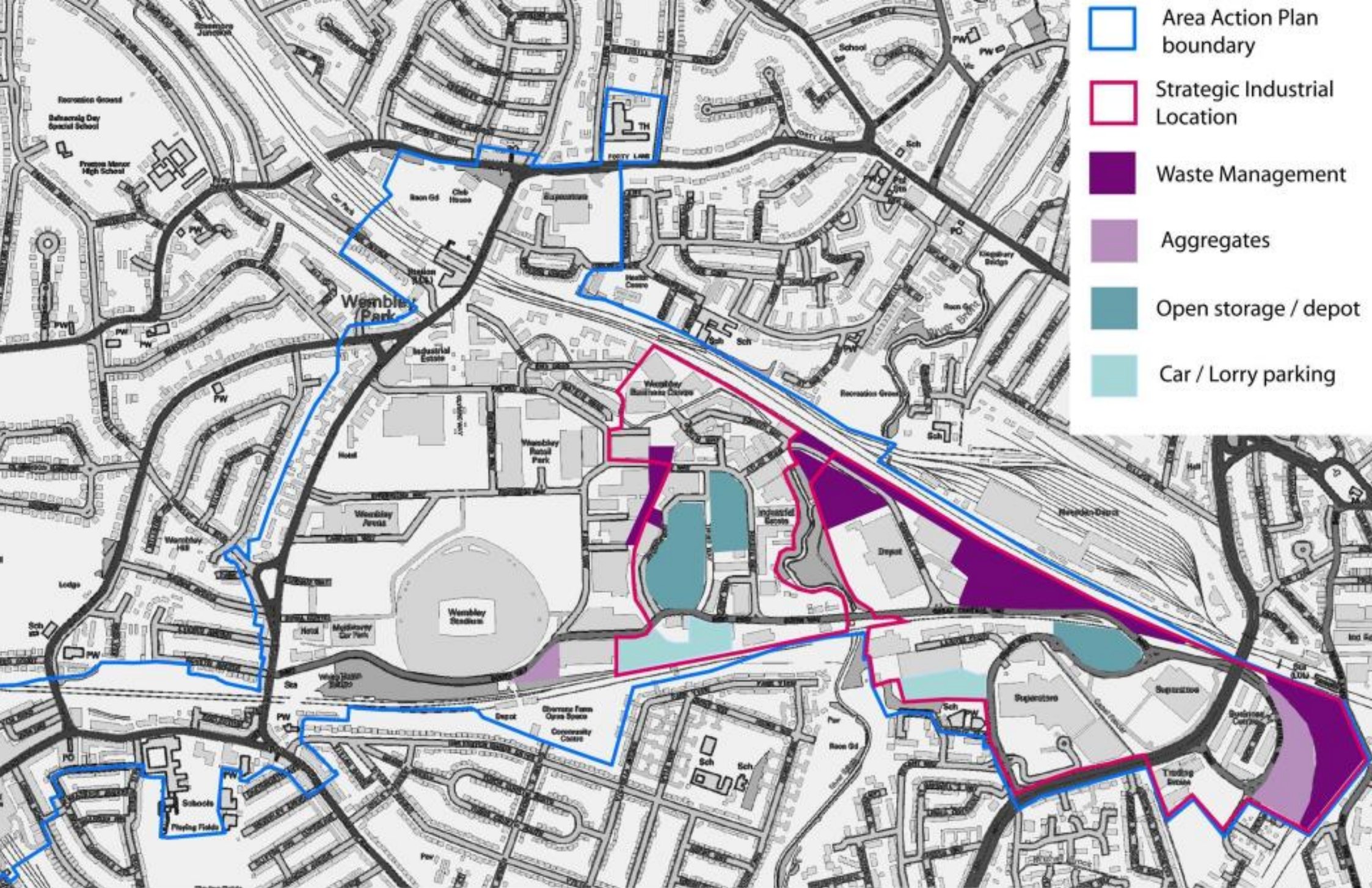
Picture 4.3 Waste storage on Hannah Close

Options BIW 2

1. No limit on the proportion of the SIL devoted to waste uses or open storage.
2. Allow no further waste management or open storage uses in the SIL.
3. Consider individual proposals on their merits and only restrict such uses if evidence of detrimental impact.
4. Actively promote the re-location of existing, badly located waste management sites.

Potential Implications BIW 2

1. The industrial estate may become dominated by such uses to the extent that it detracts from inward investment because of the impacts from noise, dust and odours.
2. Would limit the adverse effect of waste and other similar uses on the attractiveness of the area and on inward investment, but could also limit the options for the use of land unnecessarily.
3. This option would have the advantage of being based on actual estimated impact although this may be difficult to quantify.
4. Would have the benefit of dealing positively with existing, known impact, but is reliant on having alternative sites available. This approach would also require some public investment in land.



Land uses in Wembley industrial area

4 Business, industry and waste

Business Park

4.8 The UDP currently identifies land between First Way and the river Brent as a Business Park where redevelopment for business uses in high quality buildings is encouraged. It was designated because it was considered that the implementation of the Stadium Access Corridor would facilitate the regeneration of the area and thus substantially improve the environment on a key approach to the Stadium, and make better use of vacant and underused sites. However, progress stalled on completing the new road and there has been little interest in developing the area as a business park.



Picture 4.5 Towers Business Park, Carey Way

Is it unrealistic to expect the area to be developed as a business park?

4.9 Despite promotion of business park development, including within the London Plan, no business parks have been established in the locality let alone at Wembley. However, it is possible that further road and public transport improvements locally could give rise to renewed interest.

Options BIW 3

1. Retain business park designation as currently in the UDP.
2. Reduce the extent of business park designation.
3. Completely remove business park designation.

Potential Implications BIW 3

1. Experience has shown this to be an over-optimistic assessment of demand and continuing designation is likely to be unrealistic.
2. This may be more realistic but the evidence is of a continuing lack of demand into the short and medium term.
3. Potentially the most realistic option meaning that there could be a clear distinction between the SIL and an area for regeneration for a mix of uses including, potentially, residential development.

Business, industry and waste 4

Office Development



Picture 4.6 Brent House, Wembley High Road

4.10 It is generally accepted, that there will be little demand for new purpose-built offices at Wembley for the foreseeable future and that other types of development are likely to drive job creation. Although permissions exist for over 100,000 sq metres of new office space in Wembley, in light of past trends in take-up locally and the national economic downturn, it would be prudent to assume that significant demand will only arise if there is a major change in circumstances. Although the Council will be moving into 15,000 sq metres of new space by the end of 2013 when the new civic centre is occupied, it will also be freeing up a greater amount of existing space. A lack of demand is confirmed by the London Office Policy Review 2009, which recommends that a realistic view is taken of outer London centres which are recognised as

having no significant part to play in the London office market, other than providing for local needs. It is unlikely that demand will pick up in the short to medium term.

Should the AAP be promoting other job generating development rather than offices, including promoting change of use from that already granted permission?

4.11 Clearly without significant demand for office development, if current planning permissions are built out there is likely to be a significant excess of office floorspace in the Wembley area. A clear option would be to allow this to be converted to residential accommodation. However, if this were to happen then it is unlikely that the job targets would be realised as this is largely predicated on the delivery of new commercial space. An option will be to limit the amount of space that can be converted to residential accommodation and, instead, encourage its re-use for other commercial activity. There are few sites or premises existing where low-cost space for new business start-ups is available.

Options BIW 4

1. Promote the development of more low-cost, affordable workspace.
2. Allow purpose-built office development to be converted to residential or other non-commercial uses.
3. Do not allow offices to be converted to other uses until it is clear that there will be no demand in the medium term.

Potential Implications BIW 4

1. The Plan could include a policy requiring low-cost affordable workspace. Such space would provide a valuable resource for potential new businesses. However, it could result also in space being provided for which there is little demand, and it may be resisted by developers.
2. This would mean the potential beneficial use of otherwise vacant space, but is also likely to mean that employment targets will not be met.
3. This could mean that there is no incentive to build out development in the short term, with a consequent delay to regeneration schemes.

4 Business, industry and waste

Transport 5

5 Transport

5.1 Wembley is a generally well connected area, particularly by public transport, with connections from the Metropolitan and Jubilee lines at Wembley Park, the Chiltern line at Wembley Stadium station, and from London Overground and the Bakerloo line at Wembley Central. It is therefore a very sustainable location for major trip generating development. 80% of event crowds choose to use public transport. When the level of bus services is added, the area has a Public Transport Accessibility Level (PTAL) rating of up to 5 (out of 6) which means it is one of the most accessible locations in London. Nevertheless, orbital public transport connections, for example linking to Brent Cross or Ealing, are not as good as the radial connections into central London or outer London and beyond. This is identified as a key area to be addressed by the Core Strategy although it should be recognised that the Council is not the responsible authority for such service improvements. These reside with Transport for London, Network Rail and the train operating companies although the Council can promote new or improved services and also introduce supporting infrastructure improvements.



5.2 In addition, public transport connections in the east of the area are less than satisfactory. Some improvements to Wembley Central and Wembley Stadium stations remain outstanding. Those at Wembley Central are being progressively implemented over the next few years but those at Wembley Stadium station are dependent on development of adjacent lands, the timescale for which is uncertain.

5.3 Although road connection via the North Circular Road (NCR) is generally good, there are concerns about operational effectiveness and potential congestion on the road network within and through the Wembley area when major development is delivered in Wembley, alongside developments further afield at Brent Cross. Road connections to the NCR and through the main regeneration area, planned prior to the stadium redevelopment have not been completed because of funding difficulties / security concerns. Congestion occurs regularly on

main roads through the area and at key junctions. Also, there are few dedicated routes for cyclists within the area and the main rail lines provide barriers to pedestrian and cycle connection.

5.4 The Draft London Plan 2009 and the Mayor's Transport Strategy seeks improvements to public transport, walking and cycling capacity and accessibility where it is needed including areas designated for development and regeneration. It also specifies parking standards to be applied to new development with the aim of encouraging a move to sustainable transport modes and reducing the need to travel by private car. Currently, Brent's parking standards as provided within the adopted UDP do not mirror those in the London Plan although the Core Strategy and the Wembley Masterplan SPD identify that compliance is required with the earlier adopted version of the London Plan 2008. Consideration is required as to modifying parking standards to align with those in the draft London Plan bearing in mind the regeneration objectives of the Wembley Growth Area, alongside considering the potential negative impact that this could have on Wembley's town centres.

Relevant Core Strategy Objectives

Objective 8

To reduce the need to travel and improve transport choices – by

- Completing first class retail and other facilities in Wembley that reduces the need to travel to other centres.

- Improving key transport interchanges at Wembley
- Promoting access by public transport, bicycle or on foot and reducing car parking standards for growth areas because of their relative accessibility
- Reducing modal share of car trips to Wembley from 37% towards 24%

Relevant Core Strategy Policy

5.5 Policy CP7 of the Core Strategy highlights a need for new road connections and junction improvements in the Wembley regeneration area and specifically identifies the North End Road/Bridge Road junction on the Key Diagram.

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

Road Improvements

5.7 A transport study carried out for Wembley on behalf of the Council (Evidence Ref 1) concluded that the level and type of growth proposed could be accommodated providing that it was primarily based on public transport access. However, it was

concluded also that there would be a need for some additional junction and access improvements, particularly the effectiveness of the junction at the Wembley Triangle and the South Way junction complex. A subsequent study (Evidence Ref 2) re-affirmed the conclusions of the initial study and recommended potential measures to both minimise the need for travel and secure a substantial travel mode shift away from the private car towards the use of sustainable transport modes. Through the provision of enhanced bus services and facilities, and the implementation of a range of travel demand management measures, sufficient reduction in development related traffic would be achieved to allow the level of development envisaged in the Masterplan.

5.8 It should be recognised also that for new major trip-generators such as shops and leisure facilities to be attracted to the area, then some dedicated parking provision for customers who wish to use their car is also necessary.

How much emphasis should be placed on meeting the needs of those who wish to use the car both within, and to access, the area?

5.9 There is a need to encourage housing and commercial growth, and to promote the vitality and viability of town centres in Wembley, without giving rise to unacceptable environmental conditions and levels of traffic congestion. It is also important that travel choices contribute towards sustainability

objectives. It is an objective of the Core Strategy that modal share of car trips be reduced from 37% in 2009 towards 24%.

Options TS 1

1. Minimum road improvements necessary to prevent unacceptable levels of traffic congestion taking into account predicted development traffic growth.
2. More significant road and junction improvements to accommodate additional car trips generated by development and improving general network capacity.
3. A balance between minimising car use and ensuring that the area is also attractive to those who wish to come by car particularly associated with regeneration and development initiatives.

5 Transport

Potential Implications TS 1

1. The consequences of only limited improvements may not improve general accessibility, may discourage development and encourage outward travel to other competing centres
2. More significant improvements may aid general accessibility and encourage inward investment but has the potential to encourage additional travel by private car than occurs at present without adequate controls
3. A balanced approach may see a reasonable improvement in the level of general accessibility achieved without overly encouraging travel by private car.

Which specific road schemes are considered necessary to facilitate the level of growth proposed in the Core Strategy?

5.10 There are a number of road improvements that could be implemented, some of which may be necessary to enable development. There are also specific road proposals included in the UDP in 2004 which have been completed only in part, the remaining parts being potentially unnecessary to deliver the growth proposed but which would help to promote the regeneration of the area and lead to environmental improvements.



Picture 5.1 Stadium Access Corridor

Options TS 2

1. Complete the Stadium Access Corridor by altering the alignment of South Way to provide a direct connection to the Stadium
2. Complete the Stadium Access Corridor by widening South Way as far as the Stadium including the potential removal of the Adam's Bridge.
3. Return South Way to two-way traffic subject to local improvements including the potential removal of the Adam's Bridge
4. Remove the one-way gyratory system in part or in whole through the industrial estate.
5. Implement junction improvements along the Western Highway Corridor between and Including Wembley Triangle and Forty Lane (Evidence Refs 2 and 4)
6. Provide a new access connection from North End Road to Bridge Road (Evidence Ref 3)
7. Implement junction improvements at the High Road, Wembley – Park Lane junction
8. Implement only those road schemes, such as junction widening and new access formation, required by development as a result of transport assessment.

Potential Implications TS 2

1. The completion of the Stadium Access Corridor by altering the current alignment of South Way, whilst providing a much better level of accessibility on both event and non-event days, could prove very costly and potentially unviable as significant land acquisition is required.
2. A widening of South Way could prove very costly even if significant land acquisition was avoided
3. Reverting South Way back to two-way working to improve accessibility and reduce travel time would be prone to operational difficulties even if the Adams Bridge constraint was removed
4. Returning some or all of the roads which form the existing central gyratory would improve accessibility and remove current circuitous routing but could prove costly to implement and may be subject to operational difficulties
5. Many of the junction improvements could be reasonably significant in scale and thus costly to implement
6. A new access connection would greatly improve accessibility for all users and prove attractive to future development but at a reasonably significant cost
7. Improvements to the junction could aid pedestrian and traffic safety and may offer operational improvements subject to land

being safeguarded from the Chesterfield House site

8. Limiting improvements to only those that are essential may not provide a significant improvement in general accessibility and discourage inward investment and regeneration

What level of car parking provision is appropriate for the Wembley Regeneration Area?

5.11 Parking provision can be used as a mechanism for implementing a policy of restraint on car usage and promoting other more sustainable modes of travel. At the same time, however, there is a need to promote successful regeneration. In Wembley success will be measured in part by the amount of retail floorspace and other visitor attractions that are provided, and the number of visitors to the area. In order to promote such development it is necessary to provide a level of car parking that can attract those people who wish to travel by car whilst encouraging people to use other modes of travel, particularly public transport. The aim is to achieve an appropriate balance between restraint on car use, by allowing fewer parking spaces associated with development, and promoting regeneration, with more generous allowances for parking. The Mayor's London Plan establishes the parameters within which levels of parking required can be varied.

Options TS 3

1. Apply parking standards as currently established in the UDP, i.e. allow for extra parking to promote inward investment because it is a regeneration area.
2. Restrain car use by applying low maximum standards and direct resources towards improving public transport and walking and cycling routes.
3. Seek a balance between the draft London Plan standards, the existing Borough standards and the need to ensure new development is served adequately in keeping with the regeneration initiatives for the Wembley Growth Area
4. Promote the implementation of car-free development where it can be associated with good public transport accessibility

Potential Implications TS 3

1. Although the UDP standards support a higher level of provision to aid regeneration, this may lead to additional travel by private car and would not be consistent with some of the provisions of the London Plan
2. Applying more restraint based standards may hinder development unless some

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flexibility is afforded in the provision of publicly available parking

3. A greater flexibility in the application of parking standards, particularly if provision is geared to providing a greater proportion of publicly available parking, could prove attractive to potential development without overly encouraging use of the private car
4. Given that Wembley has a good level of public transport accessibility, the introduction of car-free development could lead to less reliance on the private car if incentives for travel by other modes was realistic

Public Transport

5.12 The implementation of the Three Stations Strategy over the last 10 years means that the area, which was already a destination where the primary means of access was by public transport, is even better served by its rail and Underground stations. In assessing the likely travel impacts of future development (Evidence Ref 2) it has been concluded that a further modal shift towards public transport usage will be necessary if the level of development planned for is to be accommodated without resulting in excessive congestion around the road junctions.



Picture 5.2 Wembley Park underground station

5.13 Orbital access, and in particular connection between the major centres of Ealing, Wembley and Brent Cross and the major employment areas of Wembley Park and Park Royal is poor. As development intensifies and in order to encourage investment in appropriate development in line with regeneration initiatives, improvements to orbital connectivity and linkage with key centres of attraction should be pursued. Brent, together with neighbouring authorities and partnerships, has been supportive of new and/ or improved connections and is promoting such initiatives with Transport for London as part of its involvement in the West Sub Regional Transport Plan (Evidence Ref 5). However, it must be recognised that such initiatives can prove costly and require funding support from Transport for London for which it has a range of priorities to cover.



Picture 5.3 Bus 182

5.14 In the long term, the HS2 proposals (initially a new High Speed line to Birmingham by 2025) may also have an effect on the Wembley area by freeing up capacity on the existing West Coast mainline for use by more local services and better interchange at Old Oak Common between services.

What should be the priority in further improving public transport access to the area?

5.15 Significant progress towards implementing the improvements needed to fulfil the objectives of the “Three Stations” strategy had been made by the time the National Stadium opened in 2007. The refurbishment and increase in capacity at Wembley Park station had been completed; major access improvements had been made to Wembley Stadium station through the construction of the White Horse Bridge; and at Wembley Central part of the station had been refurbished and a new passenger bridge delivered for use during major events. These improvements have gone a long way towards cementing Wembley’s position as a public transport destination and, consequently, a location where major visitor attractions can be developed in a sustainable way. Nevertheless, significant works to Wembley Central still need to be undertaken as part of the completion of the Central Square development and there will be a need for a ticketing hall when development takes place on sites adjacent to Wembley Stadium station.

5.16 In the meantime, improvements to orbital public transport are identified in the Core Strategy as being necessary if Wembley is to be enhanced as an accessible destination. Improvements to orbital public transport are also seen by neighbouring authorities, Barnet and Ealing, as essential to facilitate growth in suburban outer London. It is Brent Council’s view that such orbital improvements should be focused on bus services and, along with Park Royal Partnership and Ealing Council, has been

promoting a proposed new express bus service linking Wembley with Park Royal and Acton. Recent work undertaken by Transport for London, in association with West London Boroughs and key stakeholders/ agencies/ partnerships, and encapsulated in the Mayor’s non-statutory West Sub-Regional Transport Plan gives further credence to this approach with key links targeted for investigation between Ealing and Wembley and Ealing and Brent Cross.

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

5.18 Furthermore, the availability of funding is a major consideration when considering alternative options for new public transport infrastructure.

Options TS 4

1. Focus on significant bus service improvements to improve orbital access, including reducing journey times.
2. Implement more bus priority schemes and improve interchange facilities between bus and rail.

3. Route buses into the heart of the new urban quarter along the proposed new Boulevard and shopping street
4. Seek further bus service enhancements in the east of the area

Potential Implications TS 4

1. Improving orbital transport would offer greater choice and flexibility to existing and new passengers thus reducing dependence on the private car.
2. Enhanced bus priority and improved interchange would offer greater reliability and accessibility and encourage better use of public transport services
3. Actively encouraging buses into the heart of the new urban quarter may offer improved accessibility but would need to be designed sensitively and safely so that the predominant nature of an attractive and pleasant pedestrian environment was not compromised
4. Better services in the eastern part of the area would encourage greater use by bus and thus a better degree of accessibility which could prove attractive to existing and new development

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Walking and Cycling

5.19 If a modal shift away from the car is to be achieved, then enhancement of the pedestrian environment, together with public transport improvements, will encourage people to choose alternatives to the car. Also, the provision of attractive spaces where people can gather free from the intrusion of vehicles will help promote walking. A number of new public spaces have been provided, such as an expanded Central Square in Wembley and the new Stadium and Arena Squares close to the stadium. Further public spaces are required when further development takes place, as set out in the Core Strategy. It is important also to recognise the benefits of cycling; both walking and cycling can bring health benefits as well as delivering modal shift to help reduce carbon emissions.



Picture 5.4 cycle route



Picture 5.5 Cycle path, Great Central Way

How can enhancements to pedestrian and cycle routes contribute to achieving a modal shift away from the car in Wembley?

5.20 The provision of shared surfaces, where all the users of streets share the public realm, is a recognised way of improving the environment and safety of pedestrians and cyclists as it leads to much more considerate use by drivers of motor vehicles.

Clearly, exclusively pedestrian streets will also provide a safe and attractive environment, especially for shoppers, and dedicated cycle routes will encourage people to access the area by bicycle. The London cycle network aims to provide convenient, safe and accessible radial and orbital linkages throughout London. Wherever possible, these should be segregated and protected from major road traffic. Limited facilities and routes exist in the Wembley area, therefore further enhancements would be desirable. Secure public cycle parking and options for a public cycle hire scheme, such as the Central London scheme, could also be considered.

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

5.22 Although improvements to pedestrian and cycle facilities have taken place, there are still barriers to movement across the main rail lines which bound the eastern half of the area. Opportunities should be explored for additional crossing facilities where these can prove justifiable and financially viable.

Options TS 5

1. Provide shared surfaces throughout the new urban quarter close to the Stadium.
2. Provide exclusively pedestrian streets in locations with the heaviest footfall, and restrict servicing to early morning only.
3. Replace the pedestrian ramp to the Stadium over Engineers Way with steps.
4. Provide new pedestrian and cycle bridges over the Metropolitan/Jubilee/ Chiltern lines.
5. Ensure that any junction/ highway improvements take due account of pedestrian/ cycle access and convenience and the need to ensure a high quality public realm is established
6. Enhance existing secure cycle parking and introduce a cycle hire 'hub' scheme within the area.

Potential Implications TS 5

1. Shared surface uses need to be designed sensitively and safely to ensure their attractiveness to all permitted users
2. Pedestrian only streets, with limited permitted access, can offer a more pleasant and attractive environment
3. The replacement of the pedestrian ramps with steps would open up the approach along Olympic Way and offer a greater degree of flexibility in providing an attractive environment but at a significant cost which could only be delivered by and funded through development of adjacent lands
4. Whilst provision of one or more new pedestrian and cycle bridges would improve accessibility and reduce severance, they are costly to provide and in some cases may prove infeasible
5. Providing good quality facilities for cyclist and pedestrians would aid convenience and safety and contribute towards a high quality public realm
6. Improvements to cycle parking and the introduction of a cycle hire scheme would encourage greater use of the cycle but care would be needed to ensure any such scheme was viable

Major Event Related Activity

5.23 Wembley Stadium is a world renowned centre for sporting and other events regularly attracting crowds of up to 90,000 spectators. In addition, other attractions take place at Wembley Arena with a capacity of 15,000 attendees. The area around the Stadium and Arena is currently subject to major redevelopment including housing, shopping, leisure and commercial uses with further significant development planned over the next 10-20 years. Most travel to events is by public transport but with crowds completing the last leg of their journey on foot. Some 2000 car parking spaces are provided on major event days and key events can attract as many as 450 coaches. A temporary traffic and crowd management plan is activated on event days and the partial completion of the Stadium Access Corridor provides a tidal flow traffic system to be operated for vehicular travel to and from the North Circular Road.



Picture 5.6 Event day coach parking

5 Transport



Picture 5.7 Event day crowds

To what degree should event related activity dictate the transport characteristics of the Wembley area?

5.24 The key issues to be addressed include ensuring the safety and security of residents and visitors alike, providing a high quality pedestrian environment, and managing car and coach access and parking effectively. In many respects, a significant amount has already been achieved including increased public transport capacity and

access improvements at Wembley Park Station and more limited improvements at Wembley Central and Wembley Stadium Stations, improved access through the development of the White Horse bridge linking the stadium to Wembley town centre, and better vehicular access to and from the North Circular Road. However, there are still concerns over matters such as coach access and parking, maintenance and improvement of pedestrian facilities and crossings; maintenance and enhancement of the public realm; and providing a balance to maintain public security and safety whilst allowing major development to function and prosper.

Options TS 6

1. Identify suitable coach parking facilities and sites that ensure future requirements can be met post development
2. Introduce more effective signage for pedestrian and vehicular travel
3. Provide an enhanced pedestrian environment and introduce high quality public realm improvements without detriment to residents and visitors alike
4. Provide new crossing facilities, primarily for spectators walking to the stadium, across Wembley Hill Road.
5. Provide 'Gateway' enhancements to reflect the strategic importance of Wembley and Wembley Stadium within a major growth area.

Potential Implications TS 6

1. The lack of suitable coach parking facilities would lead to inefficient use of existing sites and temporary use of public roads, which causes disruption for existing residents and would not appear attractive to prospective developers.
2. Improved signage, static and real time, would greatly enhance residents' and visitors' experience of travelling around Wembley
3. Enhanced improvements to the public realm will improve residents' and visitors' perception of Wembley as a place to visit, enjoy and stay.
4. Improved crossing facilities would help remove sometimes difficult crossing conditions particularly when large crowds are present
5. Providing gateway features at strategic locations on entry to the Wembley area would give a greater sense of place and highlight Wembley as a major visitor destination

Priorities for Investment

What priorities should the Council establish for funding of transport schemes?

5.25 The various range of transport improvements that can be promoted as part of an overall package of improvements in the Wembley area will require a significant level of investment. Such investment will in part be delivered as part of the development process and also in part drawn from local and regional funding e.g. TfL. However, there will be limits as to the amount of funding available and the Council will need to establish priorities for scheme funding and programme for implementation alongside other priorities in key areas such as education, housing and community infrastructure.



Picture 5.8 White Horse Bridge

Options TS 7

1. Priorities for investment should be directed towards public transport, cycling and pedestrian facilities with only limited improvements to key road junctions to ease congestion and improve operational effectiveness
2. Priorities for investment must recognise that key infrastructure improvements are required to the road network in order to ensure that inward investment and regeneration occurs
3. A balance needs to be struck between providing major infrastructure improvements and the more local needs of pedestrians, cyclists and public transport users

Potential Implications TS 7

1. Directing investment towards modes of transport other than the private car may improve accessibility for such uses and lead to a reduction in private car travel which may prove attractive to some developers but dissuade others
2. Implementing key infrastructure improvements to the road network on their own may lead to greater dependence on private car travel thus negating some of the benefits that might otherwise be achieved
3. Providing a balance in the provision of improvements for all users of the transport system will offer a greater degree of choice and flexibility recognising that some use of the private car can prove acceptable with adequate control

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Housing 6

6 Housing

6.1 Wembley is a residential location as well as a visitor destination. In bringing forward new development it is important to bear in mind that the Wembley area should also become to a healthy and sustainable community. Over 4,000 homes have already been granted planning consent in the stadium area, Quintain Estates' North West Lands planning application proposes a further 1,300 homes, and there is scope to accommodate more than double this number. Critical to the success of Wembley as a residential area will be the need to ensure a suitable balance of unit size and tenure. Whereas the sites immediately adjacent to the Stadium were not considered particularly appropriate for family accommodation, this is not the case for subsequent phases of the area's development and, accordingly, there is scope for greater provision of family housing.

Housing Need & Mix

6.2 Brent's Housing Needs Survey 2005 and the West London Strategic Housing Market Assessment 2010 show an affordable housing requirement that outstrips total housing supply. The high demand for affordable housing is unlikely to change over the lifetime of the masterplan. In order to meet current and future demand for housing, the council expects that a significant amount of residential provision will be met within the masterplan area. The majority of residential buildings within the masterplan area are likely to contain a mix of uses, with commercial and retail uses at ground floor and residential above. This will create areas that are animated throughout the day and allow for sustainable environments

where people can live and work in the same building, thus reducing the need to travel. Introducing residential uses at lower levels may be appropriate in selected buildings, as a means of establishing a variety of character on certain streets, particularly in the North East District where more family homes could be located.

6.3 The masterplan identifies the North East District as being appropriate for a higher proportion of family housing. The table below gives indicative proportions for the different areas. Typically (based on 60:40 market to affordable ratio) the North West and First Way districts could deliver around 19% family housing and the North East District around 30% family housing. The council recognises that a mixed and balanced community should contain a range of homes for groups that are often socially disadvantaged and considers that there will be locations where market provided sheltered housing will be suitable. One of the council's current priorities is the provision of extra care housing for the elderly.

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

6.5 Brent Council supports the current Mayor of London's desire for more affordable family sized homes. There is a need to provide for family housing to encourage people to stay and contribute to the establishment of a long term mixed and sustainable

community. It is not the intention of the council to build a large transitional location for single people and childless couples who may be forced to move on because there is no choice of family homes available. The proportion of larger social rent units set out below follows the proportions set out in the West London Affordable Housing Investment Guide 2008-11, but recognises the practical difficulty of providing such a high proportion of social rented 4 bed+ units in the masterplan area. Instead, a split with a higher proportion of 3 bed units is proposed.

Bedrooms	Percentage* of units Social Rent		Percentage* of units Intermediate		Percentage* of units Sale/Market		West London Affordable Housing Investment Guide (2008)
	NW16	North East	NW16	North East	NW16	North East	
1							15
2							35
3	15	10	45	40	30	30	25
4+	35	40	45	40	55	45	25
	45	40	10	20	15	25	
	5	10					

Indicative new household sizes by tenure

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**Percentages refer to units*

Proportion of Affordable Housing

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

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

Relevant Core Strategy Objectives

Objective 7

To achieve housing growth and meet housing needs - by:

- Promoting development that is mixed in use and tenure, so that at least 11,200 additional homes are provided in the period from 2007/08 to 2016/2017, and that 85% of the borough's

new housing growth is contained within 5 growth areas

- Ensuring that at least 25% of all new homes built in the borough are family sized (3 bed or more) and 50% (approx.) are affordable

Relevant Core Strategy Policies

CP2 Population and Housing Growth

6.8 The borough will plan for sustainable population growth of between 25,000 and 28,000 people by 2017. The provision of at least 22,000 additional homes (including 1,030 re-occupied vacant homes) will be delivered between 2007 and 2026 (including over 11,200 homes from 2007/08 to 2016/17). The borough will aim to achieve the London Plan target that 50% of new homes should be affordable. At least 25% of new homes should be family sized (3 bedrooms or more). Over 85% of the new homes will be delivered in the growth areas with the following minimum targets (excluding the reoccupation of vacant homes):

	2007-2016	2017-2026
Wembley	5,000	6,500
Alperton	1,500	100
Burnt Oak/Colindale	1,400	1,100
Church End	700	100
South Kilburn	1,400	1,000

Rest of the borough	2,050	360
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The council will also promote additional housing as part of mixed use development in town centres where public transport access is good.

CP21 A Balanced Housing Stock

6.9 The Plan seeks to maintain and provide a balanced housing stock in Brent in support of Policy CP2 by protecting existing accommodation that meets known needs and by ensuring that new housing appropriately contributes towards the wide range of borough household needs including:

- An appropriate range and mix of self contained accommodation types and sizes, including family sized accommodation (capable of providing three or more bedrooms) on suitable sites providing 10 or more homes and in house subdivision/conversion schemes.
- Non-self contained accommodation to meet identified needs
- Care and support accommodation to enable people to live independently
- Residential care homes which meet a known need in the Borough

Student Accommodation

6.10 Policy 3.8 of the emerging London Plan states: "Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of

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dwelling in the highest quality.” The policy, which acknowledges that London’s universities make a significant contribution to its economy and labour market, aims to ensure that London’s universities attractiveness and potential growth are not compromised by inadequate provision for new student accommodation. The situation in Wembley can reflect the continuous growth of the student accommodation sector. Over the past few years, a number of major planning applications for Wembley have involved student accommodation. By 2012, 1,095 new student rooms will be completed. Further student accommodation proposals are in the pipeline which would provide 2,636 bedrooms in total.

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

Issues & Options

Maintaining Affordable Housing Supply to meet Housing Need

6.11 The reduction in capital funding for affordable housing under the Comprehensive Spending Review 2011-15 will significantly curtail the delivery of traditional new build social rented housing at target rents in the short to medium term. The new investment model moves to a revenue funded approach, whereby the reduction in capital funding is bridged by increased borrowing off the back of higher rents. New ‘Affordable Rent’ housing has been recognised in planning policy terms through the technical change to PPS3 Annex B (June 2011). Affordable Rent will sit outside the national target rent regime, but be subject to other rent controls that require it to be offered to eligible households at a rent of up to 80 per cent of local market rents, and form the principal element of the new supply offer in the short to medium term. Government also now expect s106 schemes to be delivered affordable housing through planning gain alone, with nil grant input, with the likely consequence that the amount of affordable housing on s106 schemes will also fall significantly in the short to medium term.

6.12 Increasing affordable housing rents from target rents to 80 per cent of local market rents will have a negative impact on the affordability of housing as a proportion of income, particularly within the context of the cap on benefits under the proposed universal credit, and particularly in areas with higher property values and rents, and with larger

family homes, which also attract higher values and rents. Some Registered Providers are looking at differential rents on affordable rented housing in new build schemes, with higher rents towards the 80 per cent market levels on smaller one and two bedroom units and lower rents towards target rent levels on larger family accommodation with three bedrooms or more, as well cross subsidising new build affordable housing through private development and increased rents on re-lets within their existing housing stock.



Picture 6.1 Forum House, Empire way

Options 1

1. Reaffirm the current tenure mix guidance in terms of social rented and intermediate housing.

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2. Accept that new Affordable Rent is a legitimate part of the tenure mix in Wembley and can analogously replace social rented in the housing tenure mix guidance.
3. Consider where rent levels on new Affordable Rent housing might need to be capped for affordability reasons, for example larger family housing or supported housing.

Potential Implications 1

- Retaining social rented housing at target rent levels as the principal element of affordable housing within the Wembley Masterplan housing tenure mix fails to account of the recent move to the new affordable rent model, which makes social rent a less financially viable tenure due to the reduction in capital housing grant, and would lead to a reduction in the level of affordable housing delivered in Wembley, in at least the short to medium term.
- Introducing new Affordable Rent as a legitimate part of the tenure mix in Wembley will help maintain a new supply of affordable housing in Wembley in the short to medium term off the back of higher rents, however will concurrently negatively impact affordability in terms of housing

costs as a percentage of household income.

Housing Mix – Tenure & Unit Size

6.13 In line with London Plan Policies 3A.11 and 3A.9, the LDF requires affordable housing provision on all development sites with the capacity for 10 or more homes and sets the objective that 50% of all new homes delivered in the borough are affordable. In line with London Plan Policy 3A.10, Brent will seek the maximum reasonable amount of affordable housing when negotiating individual private residential and mixed use schemes, having regard to a number of considerations including financial viability. London Plan Policy 3A.9 sets a strategic objective that new affordable housing be provided at a 70:30 social rent to intermediate housing ratio, which accords well with housing needs in the borough, albeit this is due to change to a 60:40 social rent to intermediate housing ratio in late 2011. At the same time this is a broad objective and different affordable housing tenure ratios can be better suited to specific circumstances, informed by such factors as the need to balance existing area tenure profiles to support sustainable communities, the character of an area and the form and density of new development, financial viability and funding availability.



Picture 6.2 Ada Lewis House, Empire Way

6.14 The Wembley Masterplan provides specific guidance for First Way / North West Lands and North East Lands unit size mix (Table 1 above). However, permissions granted already, which will provide the bulk of the delivery in the area, are failing to deliver against this in certain respects. For example:

- Stage 1 – lower proportion of 3 bedroom housing across all tenures: 4% of the private, 24% of the social and 0% of the intermediate housing, representing less than 8% of the total housing so far delivered on Stage 1 is 3 bedroom housing
- Stage 1 & NW Lands – no 4 bedroom housing delivered so far on Stage 1 and none planned for NW Lands

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- Stage 1 – no intermediate 3 bedroom housing delivered so far on Stage 1
- Stage 1 & NW Lands – element of private studios delivered so far on Stage 1 (12%) and planned for NW Lands (2-6%)

Options H 1

1. Retain current Wembley Masterplan housing mix guidance.
2. Revise the Wembley Masterplan housing mix guidance to more closely reflect the pattern of actual delivery on the ground.
3. Allow the flexibility to introduce different and less affordable housing tenures (discounted market rent and sale products, temporary affordable housing products etc.) into the housing mix to prop up affordable housing supply.

Potential Implications H 1

- Retaining housing mix guidance that has shown to be undeliverable on the ground could be seen as weakening the legitimacy, or at least the practical applicability, of that specific guidance and, more generally, planning guidance in Wembley.
- Revising the Wembley Masterplan housing mix guidance to more accurately reflect

the pattern of actual delivery on the ground, or allowing the flexibility to introduce less affordable housing tenures into the housing mix guidance, could undermine negotiations to deliver housing that can meet priority housing needs.

Family Housing

6.15 Given the limited supply of larger family housing and high levels of overcrowding in the borough, there is a pressing need to deliver larger family housing of three bedrooms and greater, which is reflected in Objective 7 of the Core Strategy that development should achieve 25% 3 bed+. Consideration could be given to the suitability of sites in the Wembley area to be dedicated to more suburban, low to mid rise, terraced housing, or possibly stacked maisonettes.

- North East Lands
- Brent House / Copland School site
- Chiltern Line Embankment
- De-designate some SIL

Options H 2

1. Leave at Core Strategy target of 25% 3+ bed.
2. Designate sites suitable for more family housing in Wembley.

Potential Implications H 2

- Lack of policy intervention could mean the perpetuation of the delivery of only low levels of family housing in the Wembley area.
- An increase in the amount of larger family housing would help meet housing need and tackle overcrowding in the borough, including the potential for knock on impacts through void chains.
- Planning policy designation of more sites for family housing in Wembley may have a negative bearing on the financial viability of some schemes and thereby could hinder development.

Supported Housing

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

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Priority 1: Extra Care Housing

6.17 Brent's Extra Care Housing Strategy 2010-15 identifies demand for 300 units of Extra Care accommodation over the period 2010-15.

- Average number of actual residential placements per annum (2008-2010) 273
- 2008-10 Dementia/Residential Split (29%/71%)
- ONS 2006 mid year projected 65+ population increase to 2015 @ 11.94% 32
- Projected demand for 2015 placement 305

6.18 Extra Care housing comprises self-contained homes with design features and support services available to enable self-care and independent living, with the level of care and support tailored to individual needs. Extra Care housing is popular with people whose disabilities, frailty or health needs make ordinary housing unsuitable but who do not need or want to move to long term care in the form of residential or nursing homes. Older people make up the majority of users of Extra Care, however people with disabilities that are not age related are increasingly making use of this type of housing. 20 units are currently under construction at Charles Goddard House. The only other site in the Wembley area identified for extra care housing is in Vivien Avenue.

Options H 3

1. Do not require provision of Extra Care housing.
2. Designate suitable locations for Extra Care Housing in Wembley.
3. Set quota or target for Extra Care housing.

Potential Implications H 3

- Leaving provision of Extra Care Housing to market forces may mean identified demand for places is not met, particularly due to the build specifications and costs associated with Extra Care.
- Planning policy designation of sites for Extra Care Housing in Wembley may have a negative bearing on the financial viability of some schemes and thereby could hinder development. Occupants of extra care homes are unlikely to make a significant contribution to the local economy in the location identified as the borough's key economic driver.

Priority 2: Meeting the Housing Requirements of Disabled People

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

6.20 The West London Strategic Housing Market Assessment refers to recent Local Authority survey data in West London that indicates that 14% of all households contain someone who has a special need, including 9.3% of households which contained at least one member with a physical disability. Other special needs groups prevalent in households include frail elderly people, as well as people with mental health problems, impaired sight or hearing, and people with learning disabilities.

6.21 In line with the London Plan, Brent requires all homes be built to Lifetime Homes standards and 10% to be wheelchair accessible or easily adaptable for residents who are wheelchair users. In order to meet the housing needs of disabled people consideration could also be given to:

1. Providing fully wheelchair accessible housing for physically disabled people
2. Remodelling of supported housing facilities, as well as adaptations to homes, to ensure that existing supply is able to meet the housing requirements of disabled people
3. Increasing the supply of small supported housing schemes that provide self contained accommodation and communal facilities and

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which are sufficiently flexible to accommodate a range of support and care services such that they can be adapted to meet different needs as priorities may change over time.

Private Rent Sector

6.22 Brent has one of the largest private rented sectors in London, with approximately 20,000 dwellings representing over a fifth of the private sector stock. The private rented sector market mainly consists of assured shorthold tenancy lettings that meet demand from a diverse group households and offers a great deal of choice due to its high turnover, enabling tenants to live in the best quality housing that they can afford allowing for the usual constraints over location factors. The private rented sector is an essential resource with a number of constituent niche markets that meet a variety of housing needs, from high income renters in corporate lettings, to economically active people unable to access home ownership opportunities, to homeless families receiving housing benefit and in temporary accommodation, to slum rentals at the bottom of the sector where landlords accommodate often vulnerable households in extremely poor quality properties.

6.23 Effective partnership with landlords under private sector leasing arrangements has been central to the council's work in tackling homelessness, in terms of both temporary and permanent solutions. At the same time, the sector is dominated by smaller landlords and, while many of these provide a good service to tenants, the sector

still contains some of the worst conditions and poorest standards of management. In essence, the priorities are to facilitate access and sustain occupation in the private rented sector while improving supply on the one side and enforcing standards on the other.

6.24 Wembley provides a good opportunity for a new-build supply of quality private rented sector accommodation. High regeneration and build costs are driving down the amount of affordable housing that can be delivered on new build schemes in the short to medium term and the private rented sector could be part of a package of solutions that bolster supply

Options H 4

1. Allow the market to deliver private rented accommodation in response to demand.
2. Seek to encourage the delivery of private rented sector accommodation, including measures such that delivery would have a financially neutral impact upon developers when compared to the delivery of market sale accommodation.

Potential Implications H 4

It is likely that for developers to provide additional private rented accommodation, public subsidy would be necessary.

Student Accommodation

6.25 A student population can have a variety of impacts on the surrounding community. Students can contribute significantly to the local economy. However, an increase of student population may put pressure on some types of services and facilities such as leisure or health facilities. If all the student accommodation proposals in the pipeline are completed, 2,600 student rooms would be available; that is almost 10% of the new population. The social and economic changes brought by a student population influx need to be assessed to determine the best course of action for the area. Another issue is the possibility that student accommodation use is competing with other land uses which can provide more employment opportunities or help relieve affordable housing need. Currently, there is no specific planning policy on student housing either in the UDP or the Core Strategy. With the growth of the student accommodation sector in Wembley, should there be a cap to avoid the over-concentration of student housing in Wembley?

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Picture 6.3 Student housing under construction in North End Road

Options H 5

1. Allow the market to decide the appropriate level of affordable housing

2. Set a cap on the number of student rooms that would be allowed in total, e.g. 20% of the new population.
3. Designate suitable locations for student accommodation in Wembley, and not allow it elsewhere
4. No cap - Introduce a new policy to require student accommodation proposals to demonstrate how the benefits could outweigh the possible negative impacts and how potential impacts would be mitigated.

Potential Implications H 5

- Leaving provision of student accommodation to market forces could result in student accommodation being located at the wrong places or competing with other land uses which are more beneficial to wider regeneration. Meanwhile, some social infrastructure may not be able to cope with a large increase of student residents on top of anticipated population growth.
- Giving clear policy guidance and designation of sites could attract developers to consider those sites which are normally not suitable for standard residential development, but could be

appropriate for student accommodation which would stimulate regeneration in the area.

Nomadic People

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

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

Options H 6

1. Seek to deliver landscaping improvements such as tree planting to, as well as potential layout reconfiguration of, the existing Lynton Close travellers site to mitigate any impacts from adjacent sites and improve conditions for those living on the site.

2. Consider opportunities to find a new travellers site within Wembley able to cater for GTANA identified need for between 7 and 13 additional pitches in Brent over the period 2007 and 2013.

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Potential Implications H 6

1. It may be possible to enhance the amenity and environmental conditions for residents on the site without additional land acquisition.
2. There is a shortage of suitable land locally and there may be more appropriate potential sites to meet needs elsewhere in Brent.

Town centres, shopping, leisure and tourism 7

7 Town centres, shopping, leisure and tourism

Context

7.1 Wembley Growth Area encompasses two town centres; Wembley town centre to the south west of the regeneration area and Wembley Park to the north. Wembley town centre and Wembley Park town centre are designated as a Major Centre and a District centre respectively within the London Plan (2011) and the council's Core Strategy.

Wembley Park town centre

7.2 Wembley Park is a District centre, encompassing units both north and south of Wembley Park underground station. The centre as currently defined does not include the Asda superstore to the north of the centre however now incorporates the Stadium Retail Park in the middle of the centre and the office, educational, and hotel buildings with the adoption of the Core Strategy in 2010 as suggested in the Retail Needs and Capacity Study in 2008.

Comparison and convenience floorspace

7.3 Wembley Park contains almost 16,400sqm of floorspace, of which 95% (15,600sqm) was in retail (A class) use in 2008. The presence of Asda, Lidl and other smaller grocery stores means that Wembley Park is dominated by convenience goods retail, with over 60% of the total floorspace in the centre used for the sale of convenience goods, amounting to approximately 10,000sqm. The proportion of comparison goods floorspace is small and is boosted by the presence of Curry's and JD Sports at Stadium Retail Park. In 2008 the centre

contained a high proportion of food and drink uses, mostly restaurants, cafes and takeaways (10% of total floorspace) for its size. The council's UDP seeks to encourage these types of uses in the southern part of Wembley Park centre to serve visitors to events at Wembley Stadium.

7.4 There are no development opportunities designated within Wembley Park centre itself, and currently approved applications lie outside the town centre. However, on the edge of the town centre, the Wembley Masterplan 2009 detailed an indicative layout of a new retail street which linked the proposed Wembley Boulevard within the Quintain Stage 1 application and Wembley Park town centre. This also represents a further extension of Wembley town centre as the new boulevard, alongside which consent has been granted for shops and leisure uses, will extend from close to Wembley Stadium station eastwards to engineers Way.

Wembley town centre

7.5 Wembley town centre has approximately 67,850 sq m of retail floorspace, and is the 58th largest centre in London. The neighbouring town centres of Ealing (128,800 sq m), Harrow (115,800 sq m) Brent Cross (80,400 sq m) are larger in size, with Brent Cross being the closest spatially and most similar in comparative size. Whilst Kilburn is of a similar size to Wembley in terms of its total retail floorspace, at 66,800 sq m, Wembley has a large amount of land available for development, and in the 2009 GLA Town Centre Health Check survey,

unimplemented planning permissions accounted for 2.88 hectares – the ninth largest amount of land in London.

Town centre hierarchy

7.6 In 2003-04, data from the index of the rank of shopping centres in the UK showed that Wembley was a declining centre and has been falling down the UK shopping centre index ranking. In 2003-04 Wembley was ranked in 491st place in the UK shopping index, which represents a fall of more than 200 places from its position in 1995-96. However, since 2005, Wembley's vacancy rate has been falling; in 2005 Wembley's vacancy rate was 18.4%, but by 2007 the rate had decreased to 4.7%. Despite the recession, the vacancy rate has marginally decreased from 4.7 % in 2007 to 4.3% in 2009. The council's adopted Core Strategy seeks to continue reversing its decline, improve its position in the UK shopping index and to increase the amount of floorspace in the centre in line with capacity and growth forecasts.

Convenience and comparison floorspace

7.7 In a 2009, 17,700 sq m of Wembley town centre's floorspace was for comparison goods, accounting for 26% of total floorspace. Convenience floorspace accounted for only 6,670 sq m (9.8%) whilst 17,430 sq m (25%) was service floorspace. .

Catchment area and use

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7.8 Shoppers' surveys of households in the borough, undertaken in 2003 and 2008, fed into the evidence base for the council's Retail Need and Capacity Studies. The surveys indicated that shopping was the main reason why people visited Wembley (65%), although Wembley also has the lowest proportion of visitors who do their main food shopping in the centre (34%) compared to other centres within the borough, and only 8% of visitors come to Wembley for eating and drinking. Comparatively, a high proportion of Wembley's visitors used the centre for their non-food shopping (50%). Most of Wembley's visitors used supermarkets outside its town centre, including Asda at Wembley Park and Sainsbury's in Alperton, indicating that Wembley currently lacks a main food store. Since the survey was carried out, two medium sized food stores have opened within the town centre; Tesco (445 sq m) on the north side of Wembley High Road and the Coop (925 sq m) in Central Square. However, no large "anchor" store has been attracted to the town centre. Drinking uses have remained largely unchanged within Wembley since 2003, with A4 uses remaining at around 3%, although there has been a steady increase in A3 (currently 14%) and A5 uses (currently 5%).

7.9 The majority of visitors to Wembley travelled to the centre by bus (38%), the highest proportion using this mode of transport than any other centre in Brent. Wembley also had the highest proportion of visitors travelling to the centre by car (24%) whilst, in comparison, Harlesden and Willesden Green had only 17% and 19% respectively. The most consistent view expressed as to how Wembley

could be improved related to providing a better quality environment and public realm, and increasing the amount of car parking in the centre.

7.10 The survey showed that Wembley is not currently meeting the needs of visitors to the area for entertainment, service and leisure facilities. Over half of visitors never visited for cafés and bars, and 42% never visited Wembley to eat out.

Potential for retail growth in Wembley

7.11 Brent Retail Needs and Capacity Study (2008) reviewed the level of growth that could be accommodated borough-wide across Brent town centres for comparison and convenience goods.

7.12 For the comparison goods allocation, it was recommended that 27,000 sq m would be required across Brent town centres up to 2026, to be located in Brent's two major town centres. However, given that there are no sites available in Kilburn, the approach in the Core Strategy was to identify Wembley as the main location for this growth. This approach was accepted by the Inspector at the examination of the Core Strategy.

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

Core Strategy Objectives

Core Strategy objectives include:

- Promoting Wembley as the main focus of new retail and town centre uses, expanding the town centre eastwards into the Stadium area
- 10,000 new jobs within the Wembley Area over 20 years, half of which will be created by 2017
- Completing three large scale hotels in the Wembley area and one large regional visitor attraction
- Increasing newly approved retail floorspace in Wembley by 25%
- Maintaining the position of town centres in the retail hierarchy, completing new retail developments in Willesden and Harlesden, and maintaining a range of local services

Relevant Core Strategy Policies

CP1 Spatial development Strategy – Wembley to deliver the following:

- To deliver the majority of the borough's development, employment, retail and office growth
- Primary location for new hotels and associated uses (i.e. conferencing)
- Cultural focal point for tourism and location for large scale visitor attractions
- Preferred destination for town centre uses

CP7 Wembley Growth Area

- Wembley to drive the economic regeneration of Brent generating 10,000 new jobs across retail, offices, the new Brent civic centre, conference facilities, hotels, sports, leisure,

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tourism and visitor attractors, creative and cultural industries and education facilities reflecting its Strategic Cultural Area for London.

- As identified on the Proposals Map, Wembley town centre will be extended eastwards to facilitate a further 30,000sqm net of new retail floorspace in addition to that already granted planning consent.

CP16 Town Centres and the Sequential Approach to Development

CP16 prioritises major new retail developments in the following locations:

- Major Town Centres (Wembley and Kilburn)
- District Centres
- Local Centres
- Neighbourhood Centres
- Out-of-centre locations

Should the council explicitly protect the existing retail offer in Wembley and Wembley Park town centres?

7.14 Wembley's two town centres both perform specific roles in providing for their local communities. Core Strategy policy seeks to extend Wembley's retail offer, and this could potentially impact on the existing town centres if it is allowed to develop in an unplanned way. The vision for Wembley identifies a number of specific town centre uses across the

area, including meeting local convenience needs within the existing Wembley town centre, providing service related retail at Wembley Park for stadium visitors and providing specialist or niche retail uses across the new part of the centre with extension to the east. It may be possible for policy to specify different roles, or retail offers, for different parts of the area, such as in the example in the diagram below, and then seek to direct development to preserve and enhance those roles.

Options TC 1

1. Policy that identifies key roles, including type of retail offer, to be promoted for particular parts of the area.
2. Policy to protect against local impact on the retail offer allocated.
3. No policy identifying roles or retail offer for parts of the area.

Potential Implications TC 1

1. If all parts of the area have a role or function that is identified and promoted then there is a greater prospect of achieving a balance of economic well-being across the area rather than

growth and prosperity being focused in just one or more locations.

2. The introduction of controls to protect the role and function of particular parts of the area would mean that shops and services may not vacate the town centre to locate elsewhere in the area, but could also reduce the attraction of Wembley as a whole to new inward investment.
3. Impacts on existing shops and services in Wembley and Wembley Park town centres could lead to long term vacancy and decline contrary to the aim of maintaining and enhancing the town centres.
4. Consideration of impact on the edge and outside of town centres for units of this size could ensure that there are no competing uses within the locality and the roles of the town centres are not weakened.
5. Wembley and Wembley Park typically provide convenience goods which are under 1000sq m. Consideration of impact on the edge and outside of town centres for all units could ensure that there are no competing uses within the locality and the roles of the town centres are not weakened, however a requirement for an impact could be costly and may prevent economic growth.

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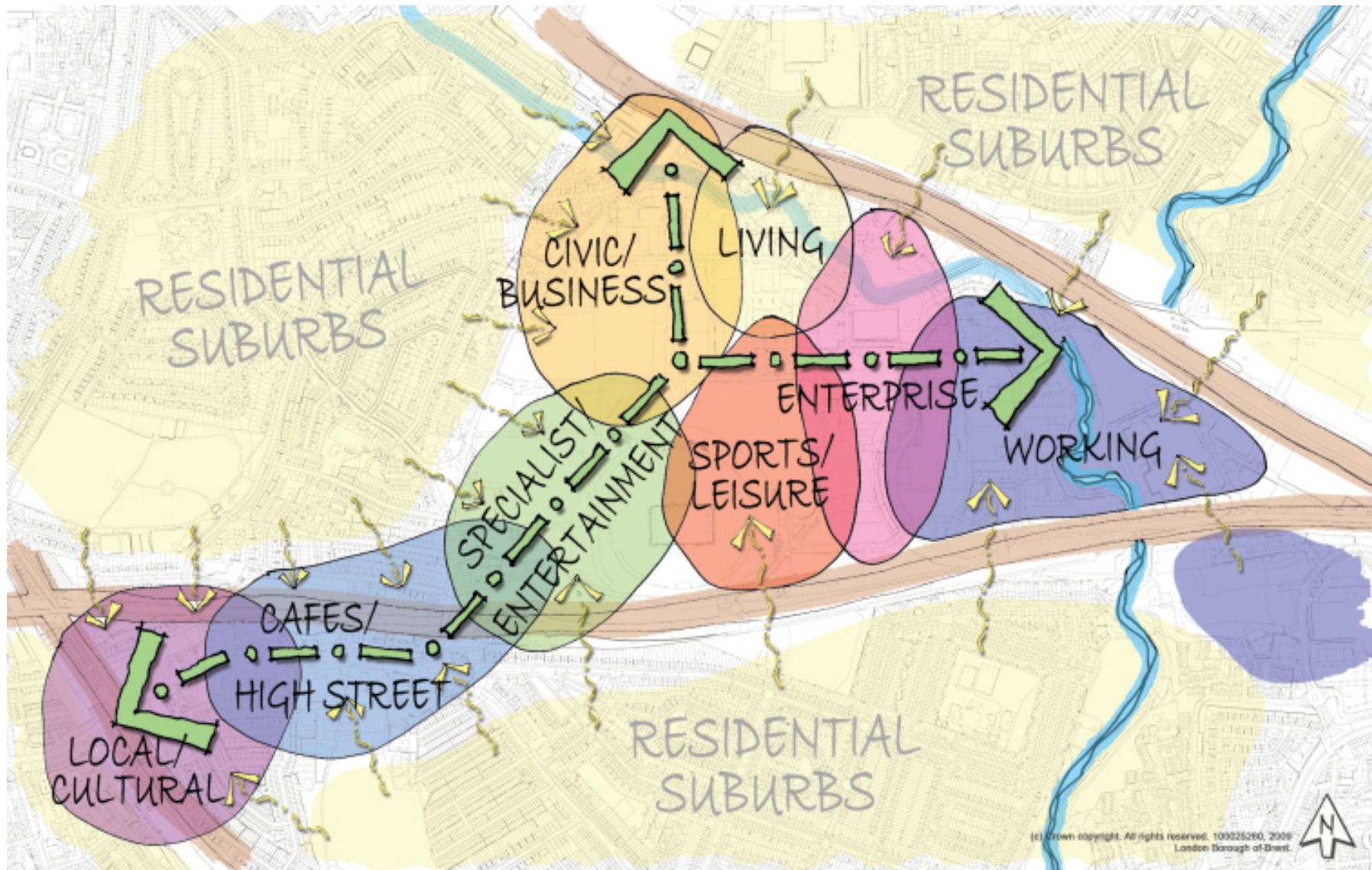


Figure 7.1 Diagram from Wembley Masterplan showing indicative roles for parts of the area

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Should the council specify the size and type of units within Wembley's town centre(s)?

7.15 Current policy is to allow new retail development that contributes to the expansion of Wembley town centre eastwards in a sequential way, so that links are maintained to the High Road. Policy also limits the size of any food store to 2,000 sq metres outside of the traditional town centre (i.e. outside the High Road) because the objective is to attract a major food store into the town centre. Additionally, Wembley town centre comprises mainly smaller units under 1,000 sq m. In order to continue to protect the centre's more local role it is possible to prevent competition for these smaller shop units by allowing only additional large (over 1,000 sq m) new units beyond the town centre boundary.

Options TC 2

1. Policy to control size and type of units in line with indicative town centre uses across Wembley.
2. No policy controlling unit sizes or type in particular locations.

Potential Implications TC 2

1. Without any control the economy could be boosted in parts of Wembley, particularly close to the stadium, but Wembley and

Wembley Park shopping areas could suffer from impact as a result.

How should the council define the boundaries of Wembley and Wembley Park town centres?

7.16 The Core Strategy defines two separate town centres at Wembley Park and Wembley town centre. The extent of Wembley town centre takes account of, and includes the land where, consents have been granted for retail expansion on first, the LDA lands close to Wembley Stadium station and then for the outlet centre, cinema etc. For Quintain Estates plc. However, since the Core Strategy was adopted in 2010, consent has been granted for a further 30,000 sq m of new floor space to provide a new shopping street between the two centres which, when all schemes are implemented, will result in a continuous active frontage from Ealing Road to Bridge Road. Consideration should be given to whether Wembley and Wembley Park should be one town centre or two separate town centres (including outlet, food retail, etc).

Options TC 3

1. Do not redefine existing town centres established in the Core Strategy. Review town centre boundaries as the area is developed.

2. Define a single town centre from Ealing Road to Bridge Road.
3. Re-consider town centre boundaries by defining tighter boundary around the existing town centres and identify a separate general Wembley Stadium retail area which links the two centres. Retain existing primary and secondary frontages within the town centres.

Potential Implications TC 3

1. This option would not recognise the permission granted for the development of the retail street on the North-West Lands and is inconsistent with the existing defined town centre boundary.
2. Defining a single town centre without additional controls would mean less control over the type of development that would be allowed over an extensive area with consequent potential impact on existing retail cores.
3. This would not recognise the continuing evolution of the area as a larger town centre with a consequent potential impact on the ability to attract new retailers and other investment.

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Where should leisure, tourism, creative and cultural uses be placed in Wembley?

7.17 The Wembley area has long been the focal point for leisure tourism, creative and cultural uses. However, conflicting industrial uses towards the east of the area are potentially detracting from the promotion of these uses. Furthermore, there is currently no policy to encourage the location of these uses within Wembley.



Picture 7.1 Wembley Big Dance Event

Options TC 4

1. Creative and light industrial to be promoted on de-designated industrial land to the east of the stadium to create a "buffer zone" between the commercial, leisure, tourism and cultural uses in the Wembley Stadium area and the industrial land to the

- east. General policy to encourage leisure, tourism, commercial and cultural uses within the stadium area.
2. Creation of a "buffer zone" as in option 1 alongside the promotion of leisure, tourism, commercial and cultural uses within the stadium area, but also promote of one major leisure attraction with a site allocation.
3. No policy to encourage leisure, tourism, creative and cultural uses across the Wembley area.

Potential Implications TC 4

1. The creative industries will provide a "clean" uses buffer zone and will help to create a better environment; alongside contributing to the economy through the general promotion of cultural, tourism, creative and leisure facilities. It could result in the loss of some existing businesses however, unless these are appropriately re-located.
2. As in option 2, the creative industries will provide a "clean" uses buffer zone and will help to create a better environment alongside contributing to the economy. The promotion of one large leisure facility will seek to promote Wembley as a major attractor and add to its status as a location with a unique offer. However, it could

- prove to be unrealistic in the current economic climate especially.
3. Without any proactive policy, investment in the area and the promotion of Wembley as a place for alternative uses may be less likely.

Should the council introduce stricter controls for fast food outlets/ take-aways within parts of Wembley?

7.18 Wembley has a large number of take aways and fast food outlets within both town centres, partly as a result of demand generated by events at the stadium in particular. There are increasing concerns that a large number of take-aways contributes to unhealthy lifestyles and is considered to be particularly problematic where these are located close to schools because of the links with childhood obesity. It may be possible for the council to control such uses in certain locations, as a number of local authorities have done, to help reduce the impacts on the health of the local population, particularly school children.

Options TC 5

1. No policy to restrict or encourage takeaway/ fast food outlets across the centres.
2. Policy which allows for take aways and fast food outlets to be located close to the

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stadium by zoning locations where they are acceptable.

3. Restrictive policy for take aways and fast food outlets close (within 800 metres) to “sensitive uses” such as schools, including maximum % thresholds.

Potential Implications TC 5

1. Further continuation and increase in take away/ fast food outlets across the Wembley area, which could have a negative impact on the health of the existing population, particularly school children.
2. Limited continuation and increase in take-aways across the Wembley area, but meeting the needs of both the existing population and visitors.
3. Positive intervention to prevent an over-concentration of uses which impact negatively on the existing population but potentially reducing the availability to visitors to the stadium, etc.

How can Wembley properly cater for a conference offer as sought in the council's vision for Wembley?

7.19 Conferencing facilities have been scaled back following the loss of the Wembley Conference Centre and associated exhibition space. The

council’s vision for Wembley is that these uses be re-provided in the form of a Convention Centre. In the current climate there appears to be little appetite for the private sector to provide such a purpose-built facility. It may be possible however, through collaboration between different providers such as the Stadium, Arena, hotels and the Council, to develop in partnership a form of “virtual conference centre” where major conferences or exhibitions can be held by making use of the various facilities that will be available in the area.

Options TC 6

1. No policy that builds on the Core Strategy to promote conferencing uses.
2. General policy to encourage conferencing within Wembley.
3. Policy designating a mix of conferencing facilities including hotels, exhibition/ conferencing and other services with sites specified.

Potential Implications TC 6

1. The option does not pro-actively seek to provide growth in the conferencing sector and does not promote Wembley’s economy.
2. The option promotes Wembley’s economy but does not promote any expansion

through the provision of additional facilities.

3. The option encourages a mix of conferencing facilities and helps to promote Wembley as a virtual conference centre, drawing on, controlling and promoting its existing assets to shape an international destination for conferencing.

Where should the council promote temporary creative uses across the Wembley area, and to what scale?

7.20 The regeneration programme for Wembley reaches beyond 2026, and the impact of the recession has meant that the realisation of the regeneration will be slower than anticipated. Meanwhile, there are a number of locations which could be exploited to create temporary uses at Wembley which could boost jobs, promote the cultural offer and increase the number of visitors to Wembley.

Options TC 7

1. No policy or promoted locations to encourage or allow for flexible temporary uses.
2. General policy encouraging landowners to allow for temporary creative uses using vacant brownfield sites or floor space, with reference to creative industries that will

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benefit Wembley's retail, leisure, tourism and creative offer.

3. Policy specifying locations for temporary creative uses.

Potential Implications TC 7

1. Vacant land and shops could be left without any purpose or use for a long period of time and could detract from the attractiveness of the area without holding any significant economic, social or cultural benefit.
2. Vacant land could be beneficially used in key locations in the Wembley regeneration area for a number of purposes and could add to the attractiveness of the area and promote culture, tourism and boost the local economy in Wembley.
3. Identifying sites could help to contribute positively to the area as in option 2, but focusing on sites could also be inflexible over the plan period.

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8 Social infrastructure

8.1 Social infrastructure such as schools, health centres, community facilities and leisure / recreation facilities ⁽¹⁾ are essential in supporting sustainable communities. As new development leads to population growth, it is vitally important that supporting infrastructure is adequate. Existing social infrastructure in Wembley is under pressure, particularly school provision, although this has been addressed in part recently by the opening of the new Ark Academy. Further school places will be needed as the population grows and the Infrastructure and Investment Framework (IIF) identifies the anticipated future level of demand.

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

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

Core Strategy Objectives

Objective 5 – to meet social infrastructure needs by:

- Securing provision for needs arising from new housing development, especially provision for education, health and community facilities.
- Constructing at least three new secondary schools and three new primary schools
- Providing community facilities to meet the needs of Brent's diverse community

Objective 12 – to promote healthy living and create a safe and secure environment by:

- Ensuring there is sufficient space for Primary Health care providers, particularly to meet additional need in the growth areas

Relevant CS Policy

- **CP7 Wembley Growth Area** – *anticipates need for the following infrastructure;*
 - 2 new 2-form entry primary schools
 - Extensions to existing schools
 - Nursery places
 - Health facilities with space for 14 GPs and 11 new dentists
 - New multi use community facilities
- **Wembley Growth Area Key Diagram** – shows location of proposed primary school in North East District, expansion at Copland School and new health centre (space currently provided in Quadrant House)

- **CP15 Infrastructure to support development** – states that before granting planning permission for major proposals, the council will have to be satisfied the infrastructure requirements arising from the scheme will be met by the time it is needed.
- **CP23 Protection of existing and provision of new Community and Cultural Facilities** – New multi-functional community facilities provided at 370m² per 1000 population.

Education provision

8.4 As there is an increase in local population with new housing development there will be a need for additional nursery and school places. Providing for additional primary school places needs to be addressed urgently. Currently there are 11 primary schools in the Wembley area. In addition, planning permission has recently been given for a new primary school in the grounds of Preston Manor High School (LPA reference 10/3203) which is due to open in September 2011. Population growth with housing development will need further primary school provision, which could be met by building new and/or expanding existing primary schools in the area. New secondary school places will also be needed, however pressure on existing secondary schools is currently less critical and as their catchment area is larger, these do not necessarily need to be located directly within the area of population growth. As new nursery and other day care provision have limited space requirements,

¹ see also the open space and sports chapter

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

How and where should new primary school places be provided?

8.5 Core Policy 7 anticipates the need for 2 new 2-form entry primary schools to serve Wembley Growth Area. This could be provided by either:

Options SI 1

1. Expanding existing schools in the vicinity of Wembley AAP
2. Providing a new primary school in the AAP area

Potential Implications SI 1

1. Expanding existing schools may be a more deliverable option as a new site does not need to be found; however the additional school places will not necessarily be close to where housing development has increased demand.
2. A minimum area of 0.5ha is needed for a 2-form entry primary school. The council is unlikely to have resources to purchase

a site of this size; however Quintain could provide a site at Fulton Road, opposite Euro House. This site is near to planned housing growth and will therefore be close to future demand. However, the site is currently adjacent to Strategic Industrial Land and any proposal would be subject to securing a satisfactory school environment.



Figure 8.1 potential school site

Health

How should the health needs of a growing population be met?

8.6 Population growth from new housing development will need additional space for primary health facilities. The Core Strategy sets out that affordable floorspace to accommodate 1 new GP for every 1,500 people will be required from new housing development. In Wembley, the IIF estimates that space for 17 GPs and 12 dentists will be needed by 2019. In recent years the Primary Care Trust have developed expanded health facilities at Chalkhill and Monks Park Clinics, so there is not an immediate need for additional provision. Quintain built a 1469sqm health facility as part of W04 Quadrant House which is currently vacant. Strategic decision making within the health sector is at the present time going through a period of uncertainty as the government implements healthcare reform.

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Picture 8.1 Monks Park health clinic

Options SI 2

1. A new central health centre could be provided towards the end of the development period once there is sufficient demand for new provision.
2. Space for additional GPs could be provided at a number of smaller health centres across Wembley.
3. Space for additional GPs could be provided by expanding existing GP practices in the Wembley area.

Potential Implications SI 2

1. A central health facility would be close to the demand arising from housing development and could provide a greater range of services such as minor procedures and out patient appointments. Delivery of a single larger clinic will be more difficult, with high costs associated with finding a suitable site.

2-3. These options are more flexible and deliverable, providing additional facilities incrementally. However, they may not be as accessible to future patients or provide the wider range of health services and associated health benefits.

Community and cultural facilities

How should the needs of Wembley's diverse communities be met?

8.7 Wembley's diverse population should be supported by a range of community facilities including facilities for young people, cultural, community and religious use. While the council can only provide a limited amount of space directly to help meet these needs, new development provides an opportunity to improve and expand provision. The Core Strategy commits to providing multi-functional community facilities (excluding schools and health facilities) at a rate of 370m² per

1000 new population. Part of this will be met by the new Civic Centre which includes a 750m² community library. There are a number of existing community facilities in Wembley, some of these lack sufficient funding or have recently closed. Funding derived from new development could provide investment for these existing facilities. Additional new community space will be needed as demand from a growing population increases and could be provided in a number of shapes and forms and through different mechanisms:

Options SI 3

1. Type of community/cultural facility:
 - a. Single, large, multi-use community facility
 - b. Smaller, specialised community facilities
2. Mechanisms to fund community facilities:
 - a. Substantial community and cultural space could be provided at current market value, on the basis that the space will be filled as Wembley is a regional attraction.
 - b. Provide less new community space but at a subsidised rate to increase affordability.
 - c. Funding from development such as S106 and New Homes Bonus could be used to support and expand

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existing community facilities in Wembley.

Potential Implications SI 3

1. Large multi-use community facilities may not be suitable for all users. Specialised single use facilities will require more funding.
2. Community and cultural space provided at market value could be too expensive for local providers. However, there will be limited subsidy available to provide more affordable space.

How can demand for places of worship in Wembley be met?

8.8 The diversity of Wembley's population means there is additional pressure for places of worship to meet demand from different faiths. Faith groups can find it difficult to find sites for new or expanded places of worship which are affordable. The planning system could respond in a number of ways to support and help meet the demand for places of worship:

Options SI 4

1. Shared space and multi-faith facilities could be encouraged.
2. Religious uses could be allowed in some vacant employment areas where land values are cheaper.
3. Religious uses could be allowed in some vacant town centre locations.

Potential Implications SI 4

1. Shared space may be suitable for some communities but not for everyone.
2. In addition to the loss of protected employment land, religious facilities allowed in these locations are likely to be poorly served by public transport and an increase in associated car journeys could adversely impact surrounding business uses.
3. Changes of use within town centre locations could adversely affect the vitality of a centre.

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9 Response to climate change

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

Core Strategy Objectives include:

To achieve sustainable development, mitigate and adapt to climate change. Specifically to

- Promote mixed use, mixed tenure development in areas of good public transport
- Reduce the amount of energy consumed in new buildings
- Build two district wide CHP plants by 2017.

In addition, Brent's Climate Change Strategy and Action Plan objectives include:

- Adapt to climate change
- Mitigate future climate change
- Encouraging the use of renewable energy sources

Relevant CS Policy

- **CP7 Wembley Growth Area** – anticipates need for combined heat and power plant, if financially viable
- **CP19 Brent Strategic Climate Mitigation and Adaptation Measures**– requires CSH level 4 in growth areas and schemes within Wembley to connect to, provide for or contribute towards CHP, unless demonstrated to be financially unfeasible.

Relevant London Plan policy

Series of Mayoral policies which seek to make London a world leader in tackling climate change, including:

- 60% reduction in carbon emissions by 2025 (LP 5.1)
- Minimise carbon emissions from new development beyond building regulation targets (LP5.2)
- Retrofitting and reducing emissions from existing buildings (LP5.4)
- 25% of heat and power from decentralised energy by 2025 (LP5.5, 5.6)
- Promote renewable energy generation in major development (LP5.7)
- Adapting to climate change and urban greening (LP5.9 – 5.15)

Energy & Carbon Emissions (Climate Change Mitigation)

How can carbon emissions from buildings in Wembley be minimised?

9.2 In order to help meet national green house emission reduction targets (34% by 2020, 50% by 2027 and 80% by 2050), London targets (60% by 2025, London Plan) and local targets (Brent Climate Change Strategy) for reducing carbon emissions, measures should be incorporated into the WAAP to reduce carbon emissions. This could be achieved in a number of ways:

Options CC 1

1. Set minimum building fabric performance standards for new development in line with the government's recommended fabric specification to meet Zero Carbon standard in 2016.
2. Promote use of combined heat and power (see issue CC2)
3. Set a target for renewable energy generation in the area & examine sources of renewable energy which could be located in Wembley e.g. solar power and heat pumps
4. Reduce energy demand from existing buildings by promoting retrofit energy efficiency measures.

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Potential Implications CC 1

1. Fabric performance standards could impact on design and appearance and restrict flexibility in approaches to reducing energy demand.
2. CHP is an efficient source of energy and reduces CO2 emissions but requires significant investment.
3. Setting a renewables target may not address the need to reduce energy demand and could restrict flexibility in other approaches such as using CHP.
4. Planning has limited control over existing buildings unless there are proposals for a change of use or extension when retrofit measures could be sought.

Is a Wembley District Energy Network (DEN) desirable and how can it be implemented?

9.3 The Core Strategy supports the development of a CHP plant within Wembley and this is in line with the Mayor's aim for 25% of London's heat and power to be supplied by decentralised energy by 2025. Currently schemes coming forward are proposing site-wide CHP solutions, however greater efficiencies could be achieved if a wider Wembley network was established. This would need to overcome barriers of connecting different sites to one another and finding a site for a single energy centre. There is a significant financial risk in pursuing a single energy centre solution for Wembley and

this would require substantial viability testing. It is considered more appropriate to ensure developments within Wembley are *network ready* by installing the appropriate infrastructure to connect to any future district energy network should it be forthcoming in the future.

Options CC 2

1. Future proofing e.g providing space for heat interchange units
2. Establish a hierarchy of compatible renewables with DEN
3. Compel adjacent sites to connect to one another where feasible
4. Collect financial contribution towards establishing the network
5. Build on and expand capacity of Civic Centre CHP

Potential Implications CC 2

1. Although sites may be future proofed, there is no guarantee of future connection which would require additional investment for connecting pipe work.
2. A DEN would provide heat to connected sites. Renewables generating electricity are therefore more compatible. A hierarchy of preference however would reduce flexibility in onsite approaches.

3. A site owner may be reluctant for their energy and heat supply to be dependant on an adjacent site and unwilling to meet the additional cost of connecting pipe work.
4. Financial contributions taken towards DEN will reduce amount of contributions available for other infrastructure such as schools and transport.
5. An ESCo (Energy Saving Company) will need to be established to supply power to multiple sites.

Could energy from waste be used in Wembley?

9.4 Apart from looking at the opportunity of having a decentralised energy network to provide heat to residential, commercial and community units in Wembley area, there is a potential of introducing waste fuel for reducing or eliminating the cost of waste disposal and making Wembley self-sufficient. Many fuels can be derived from waste, as follows:

- Biomass
- Biogas: gas produced by the anaerobic digestion (biological materials such as sewage gas, food processing waste, pharmaceutical waste and municipal waste – that could be collected through an Envac or similar system)
- Liquid Biofuels such as biodiesel, and by-product of biomass such as bioethanol, biomethanol and biodimethylether
- Liquid Waste (such as animal fats)
- Waste fish oil

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9.5 There are a number of issues to consider in potentially generating energy from waste in Wembley:

- The existing land uses, factories and plants where their waste has the potential to provide energy fuel. Obvious candidates include Careys (biomass), Premium Meats (Liquid waste) and food waste from hotels/restaurants/housing (anaerobic digestion), which should be investigated.
- Potential suitable sites for locating waste fuel industries.
- Consider the air quality (NO_x and PM₁₀ emissions) and other environmental impacts of different fuel types.

Options CC 3

1. Do nothing and leave the market to decide how energy is produced locally
2. Identify sites which would be appropriate for locating anaerobic digestion plants
3. Introduce a new policy to encourage relocation of renewable energy industries in the Wembley AAP area

Potential Implications CC 3

1. If fuels can be derived from waste generated in the Wembley area and is not processed and used locally, then this should be a very sustainable of generating energy.
2. Without policy intervention, there would be no joint action between heat suppliers and heat users.
3. Clearer policy guidance could encourage investments in suitable locations for waste fuel industries.

Can synergies with the industrial area be made to supply Wembley with energy?

9.6 Once the new waste site in Hannah Close reaches full capacity, there may be proposals to expand the site. There may also be proposals to develop new waste processing facilities locally which have the potential to provide heat to the Wembley area from biomass.

Options CC 4

1. No policy dealing with energy from waste
2. Introduce a new policy to require developers proposing new waste processing facilities to carry out a feasibility study to investigate if heat could be provided to Wembley from biomass or

biomass by-products and anaerobic digestion from municipal waste or other sources.

Potential Implications CC 4

1. Without a policy to derive energy from waste, opportunities could be missed.
2. There will be financial implications of investigating potential and making a facility adoptable to energy supply.

How can electric car charging infrastructure be introduced in Wembley?

9.7 Road transport is responsible for over 20% of green house gas emissions in the borough. Electric cars have several potential benefits including a significant reduction of urban air pollution and reducing greenhouse gas emissions (depending on the fuel and technology used for electricity generation) and becoming less dependent on imported fuel. Despite their potential benefits, widespread adoption of electric cars faces several barriers and limitations. Factors discouraging the adoption of electric cars include the lack of public and private recharging infrastructure.

9.8 Currently Elektromotive has more than 135 of its electric car recharging units installed across London. Most EVs' batteries need recharging for

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7-8 hours after around 100 miles. The long charging time would discourage non-domestic users. Some types of batteries can be charged almost to their full capacity in 10–20 minutes. Fast charging requires very high currents. Further investigation of the charging time and charging management is needed.

9.9 Apart from costing around £7,500 per charging unit, the cost of acquiring a dedicated on street parking space should be taken onto account. The standardised requirements for charging points in residential/commercial car parks respectively and the feasibility for having on street charging points which will not result in losing Council parking revenues should be investigated.

Options CC 5

1. Leave to market forces so that developers add charging points when there is demand.
2. Include a standard for electric car charging points in private car parks eg. one for every 30 cars.
3. Identify the locations for electric car recharging units in Wembley AAP.

Potential Implications CC 5

1. Careful considerations on suitable locations could avoid street clutter and ensure cables being laid at the same as the other street furniture – to avoid constant road works.
2. Leaving provision of charging points to developers to decide could hinder the wider use of electric cars.

How can Wembley prepare for a changing climate with more severe weather events and more frequent heatwaves?

9.10 Increasingly it is acknowledged that a certain level of climate change is inevitable and development will need to be built to cope with a changing climate. UK Climate Projections predict that summer average temperatures in London will rise by 1.5°C in 2020 and 2.3°C in 2040, that summer rainfall will decrease by 6% in 2020 and 12% in 2040 and that winter rainfall will increase by 6% in 2020 and 12% in 2040. The main climate change impacts on London will be overheating (urban heat island effect), water scarcity, flooding, severe weather events and more frequent heatwaves.

9.11 Specific issues for Wembley include the legacy of industrial use in the area which led to a lack of green and 'cool' spaces. Much of Wembley

is deficient in open space and there are few mature trees. Land adjacent to the Wealdstone Brook is most at risk of flooding, although much of Wembley is also prone to surface water flooding. In addition the majority of the sewer network in the Wembley area is undersized.

Options CC 6

1. Set a target to increase the proportion of green cover in Wembley (using green space, green roofs & tree planting)
2. Set criteria for tackling overheating in buildings & the public realm (see example below)
3. Set Wembley specific flood risk response and sustainable urban drainage requirements (see example below)
4. No local targets for green cover.

Potential Implications CC 6

1. Increasing green cover is known to reduce the urban heat island effect as well as providing flood alleviation, wildlife and amenity benefits.

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2-3. Detailed criteria could restrict design flexibility and innovation in responding to over heating and flooding.

4. Leaving it to market forces would lead to no increase in green cover.

Example measures which could be required to tackle heating and urban heat island effect:

- avoid the need for cooling system by making use of the cooling hierarchy (draft London Plan)
- avoid excessive solar gain by providing shading from trees, buildings, recessed or given overhangs, blinds or shutters and reflective glass
- green roofs
- specify materials which will perform adequately in the climate throughout the lifetime of the development
- vent any waste heat from mechanical ventilation or cooling systems above the roof level
- passive ventilation and heating systems
- contribute to the planting and maintenance of additional street trees (with root barriers), soft landscaping and pocket parks.
- Use cool or reflective materials on roofs or facades and cool pavement materials

Sustainable urban drainage measures:

- Install preventative measures including rainwater harvesting, green roofs and water butts
- Filter strips & swales – drain water away from impermeable surfaces
- Infiltration devices (may not be suitable for London clay soils)
- Storm water storage tanks
- Permeable and porous pavements
- Basins, reed beds & ponds to hold water when it rains

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10 Open space, sports and wildlife

10.1 There is a lack of public open space in Wembley. Much of the Growth Area is more than 400m walking distance from either King Edward VII Park or Brent River Park and is therefore considered to be deficient in public open space provision. There are also few small public open spaces in the Wembley area other than Sherrans Farm. Nearby Chalkhill open space is separated from Wembley by the Metropolitan and Jubilee railway lines. There are playgrounds at King Edward VII and Brent River Park. The area south of the High Road and Harrow Road is a priority area for new play provision.

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

- New and upgraded sports halls
- Pitch and changing facilities at King Edward VII Park and Chalkhill open space
- New MUGAs at King Edward VII Park, Sherrans Farm and Chalkhill Youth Centre
- Refurbished BMX track at Chalkhill

10.3 The expected population growth within Wembley will require new public open space and sports provision. Anticipated facilities needs are set out in the Infrastructure and Investment Framework.

Core Strategy Objectives include:

- *Promote sport and other recreational activities* – new facilities in areas of deficiency, one new pool
- *Protect and enhance Brent's environment* – new open space in areas of deficiency, meet needs of new population commensurate with current levels of provision, at least **2.4ha Public Open Space in Wembley**, enhance tree planting & waterways.

Relevant CS Policy

- **CP7 Wembley Growth Area** – New park (1.2ha) and 3 pocket parks (0.4ha each), improve quality & accessibility of existing open spaces, a new community swimming pool, indoor & outdoor sports facilities, play areas, plant min. 1,000 trees.
- **Wembley Growth Area Key Diagram** – shows existing open spaces, indicates location of 4 new public open spaces and proposed pedestrian links to open spaces
- **CP18 Protection & Enhancement of Open Space, Sports & Biodiversity** – New parks in Wembley. Contributions from development will be sought towards sports facilities priorities

Should the plan include detail about the location and size of a new park in Wembley?

10.4 The new 1.2ha park will be the principal new open space in the AAP area. It is required to meet the needs of the increased resident and working population of the area. The expected population growth would require a 2ha public open space, however it is recognised that this would be impractical to deliver. The Core Strategy therefore states that the new park should be at least 1.2ha in size. In addition to the new 1.2ha park a series of pocket parks are required which should be well connected to provide a sufficient level of open space within a densely populated area. There are a number of options as to how the WAAP could deal with the new park:



Picture 10.1 New park - artists impression

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Options OS1

1. Set no further requirements regarding the new park other than repeating the quantum of open space required by the Core Strategy
2. Specify that the new park be located adjacent to Engineers Way, orientated East to West
3. Set a series of additional criteria for the new park including; function and use, character & design, provision of substantial play facilities, natural surveillance, distinction between public and private space, reducing flood risk and management

Potential Implications OS 1

1. This option is the most flexible and will not restrict the layout of surrounding development. Wider benefits from the new park such as a link between districts may not be achieved.
2. This option maximises natural daylight and provides a physical link to eastern districts and the River Brent, although it limits the layout and quantum of development facing directly onto the new park.
3. This option may ensure the quality of the new park but multiple requirements may affect deliverability.

What other open space improvements should there be?

10.5 The need to enhance and improve public open space in Wembley is established in the Core Strategy. There are a number of options for achieving this including creating new public open space and improving access to existing open spaces. Some options are listed here, and there may also be others:



10 Open space, sports and wildlife

Options OS2

- 1 New pedestrian bridge links to/ connect to open spaces:
 - a. Pedestrian link across Metropolitan & Jubilee lines linking to Chalkhill Open Space at St David's Close.
 - b. Pedestrian link across Chiltern railway to Sherran's Farm Open Space
 - c. Pedestrian link across Metropolitan & Jubilee lines linking to Chalkhill Park at Chalkhill Road
- 2 Create public access to Copland playing fields
- 3 Create a new woodland walk along Chiltern Embankments
- 4 Semi-naturalise the Wealdstone Brook and create a linear open space for informal recreation
- 5 Prescriptive criteria could be set for Olympic Way to ensure its role as a public space with dedicated space for performance, public art and seating.
- 6 Create a new public space at St John's Churchyard
- 7 The plan could include a Green Grid policy to coordinate these improvements and create a network of interlinked, multi-purpose open

spaces. The policy would also address connectivity between open spaces by identifying pedestrian/cycle priority routes which connect open spaces.

Potential Implications OS 2

New pedestrian bridges over the railway lines could significantly improve access to open space, a bridge to Chalkhill open space would link the River Brent walk and Green Chain. However, they are very costly, a bridge to cross the Metropolitan and Jubilee lines is estimated at around £3.5million. Improving pedestrian access with bridges could also adversely impact nearby residential properties.

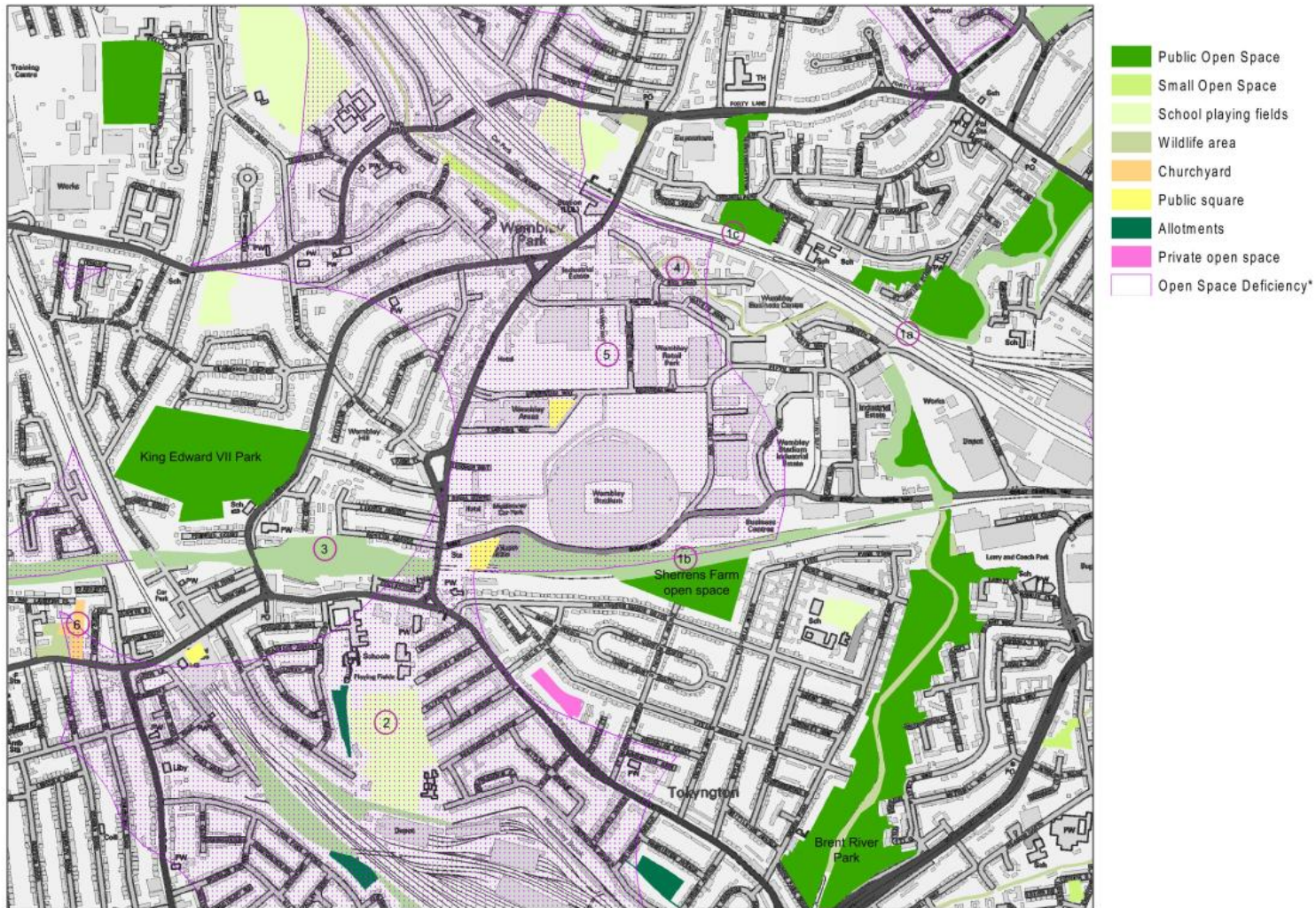
2-6. Other open space improvements could help relieve the pressure on existing open spaces in an area of deficiency. Open space improvements will also have wider health and well being benefits providing opportunities for active and informal recreation. Any improvements will require initial investment and ongoing maintenance and management.

7. Ensuring open spaces are well connected with green and attractive routes will alleviate the high density urban character of the area.



Picture 10.2 Living wall & planted balconies

Open space, sports and wildlife 10



Picture 10.3 Potential open space proposals

10 Open space, sports and wildlife

Is there a need for new food growing space to be provided in the Wembley area?

10.6 In the Wembley area there are public allotments available at Cecil Avenue, Lyon Park Avenue and Bovington Avenue, however, all plots are full with long waiting lists. There are also a small number of private allotments at Vivian Avenue. Limited development is promoted at Vivian Avenue to enable improvements to the allotments and existing tennis courts and club house (SSA25 of the Site Specific Allocations DPD). Brent Open Space Report – PPG17 Assessment identifies a local standard of 1 new allotment plot per 200 new residents. The report recognises the constraints in providing new allotment plots that food growing opportunities can also be incorporated into new housing development by providing growing space at roof level. Options to address allotments and food growing in Wembley include:

Options OS 3

1. New development could be required to provide space for food growing, either in communal spaces or rooftop gardens.
2. Allotment space could be expanded on existing open spaces such as Vivian Avenue and Vale Farm.
3. School redevelopments could incorporate food growing space.
4. Using vacant spaces temporarily for food growing

Potential Implications OS 3

1. Providing growing space within development sites will have the benefit of being close to where demand is but there is restricted space available on high density development sites typical in Wembley. Food growing space could compete with other space requirements such as children's play areas or space for renewable technologies such as PV panels.
2. Food growing space provided by expanding existing allotments will not necessarily be near to the increase in demand.
3. Food growing at schools can provide an educational resource but will require management and maintenance arrangements.
4. This could be a good temporary use of vacant spaces, and planting containers could be used which can be moved in the future.



Open space, sports and wildlife 10

How can improvements to sports facilities in the Wembley area be made?

10.7 The council has secured a new community swimming pool and health and fitness centre as part of the redevelopment of Dexion House, Empire Way. The council's Sports department is implementing the priorities of the Facilities Strategy and has recently laid out football pitches at King Edward VII park and installed a new MUGA. Other sports facilities will be needed and these could be delivered by a number of ways including council capital investment, access to school facilities and funding from development.

**Options OS 4**

1. Sports facilities improvements will be delivered by council capital spend and S106/CIL receipts from development where additional demand is created
2. In addition to option 1 schools could be required to make new or upgraded sports facilities available for community use out of school hours, e.g Copland School.

Potential Implications OS 4

1. Other demands on S106/CIL funds such as education and sports may mean there is limited investment available for sports
2. Community use of school facilities could require additional management and maintenance arrangements.

How and where should play provision be increased?

10.8 As with other forms of open space, there is a shortage of play provision in Wembley. The only existing equipped play areas are at King Edward VII and Brent River parks. However, there are other opportunities for informal play such as the water fountains at Arena square. New development will increase demand for play facilities and the Infrastructure and Investment Framework identifies the need for 5 new neighbourhood play areas by 2026. Play provision in Wembley could be improved in the following ways:

Options OS 5

1. Provide formal neighbourhood play areas in open spaces created by development and at Sherran's Farm open space.
2. Require a more play friendly environment with child-friendly streets and public spaces

Potential Implications OS 5

1. New formal play areas can be provided near to where there is an increased demand.
2. A child-friendly public realm will increase the visitor attraction of Wembley but will need additional investment.

10 Open space, sports and wildlife

How can people's access to wildlife and nature conservation be improved?

10.9 There are limited areas of nature conservation value in Wembley, reflecting its built up urban character. The main areas of habitat are the Chiltern line embankments, Wealdstone Brook and Brent River Park. There are also smaller wildlife pockets at St John's churchyard, Oakington Manor Primary School and Ark Academy. Much of Wembley is considered to be deficient in areas of wildlife that people can enjoy and relax in. London Plan policy seeks to improve people's access to nature. There are a number of options for improving wildlife value and areas of accessible nature in Wembley.



Options OS 6

1. The Chiltern railway line embankments provide a continuous strip of established woodland, and are designated for their nature conservation value. Site Specific Allocation W10 identifies the potential of development of the southern embankment to help contribute to the regeneration of Wembley town centre. Development of the northern bank will only be permitted as part of a comprehensive scheme that includes the southern section and contributes to the regeneration of the town centre. This could provide an opportunity to create a new public access and green link through the site, with measures to enhance wildlife value along the northern bank.
2. The Core Strategy commits to enhancing the Wealdstone Brook by providing amenity open space and improving biodiversity. The Plan could provide further detail as to how the brook can be semi-naturalised.
3. River Brent restoration phase 2 would remove the concrete channel and extend the riverside park and natural corridor.
4. St John's churchyard could be converted into a public garden which provides a relatively tranquil open space and an

opportunity to enjoy the sights and sounds of nature.

5. New development could be required to make wildlife enhancements as part of the built environment; measures could include biodiverse green roofs, living walls, tree planting and landscaping to encourage wildlife and the use of bat and bird boxes.

Potential Implications OS 6

The scale of investment required to achieve wildlife improvements varies between options, with measures to semi-naturalise watercourses likely to be the most costly. However, these are also likely to achieve the greatest cumulative benefits being part of a wider network of green corridors.

Consultation questionnaire 1

1. I&O Questionnaire

Business, Industry and Waste

Tick the options you agree with

BIW1: Strategic Industrial Location
(please select all that apply)

Leave the extent of the SIL as currently defined ...

Introduce policy whereby development proposals adjacent to SIL should have regard to the potential effectiveness of these locations

De-designate SIL immediately adjacent to key sites identified for regeneration which will include residential or other sensitive uses

De-designate substantial part of the SIL to facilitate wider regeneration and environmental improvement

BIW2: Waste Management
(please select all that apply)

No limit on the proportion of the SIL devoted to waste uses or open storage

Allow no further waste management or open storage uses in the SIL

Consider individual proposals on their merits and only uses in the SIL

Actively promote the re-location of existing, badly located waste management sites.

BIW3: Business Park
(please select all that apply)

Retain business park designation as currently in the UDP

Reduce the extent of the business park designation

Completely remove business park designation

BIW4: Office Development
(please select all that apply)

Promote the development of more low-cost, affordable workspace

Allow purpose-built office development to be converted to residential or other non-commercial uses

Do not allow offices to be converted to other uses until it is clear that there will be no demand in the medium term