

CONSULTATION RESPONSES SUMMARY DOCUMENT JANUARY 2004

	DATE	CONSULTEE	RESPONSE FROM	CONTACT	COMMENTS	RESPONSE / OUTCOME
1	02/12/04	Barton Willmore	Associate Architect	Brian Paul	<ul style="list-style-type: none"> • Believe RE International site offers the potential to make a civic gateway to New Wembley and by way of sketch offer development option. • Comment: By keeping the remainder of the site deep to the east, and retaining the present alignment of Southway Road, what will inevitable be a large-scale development is well away from the railway and the housing to the south. 	Contents do not relate to masterplan document.
2	16/01/04	Barton Willmore on behalf of RE International Ltd and Belway Homes Ltd	Partner	Iain Painting	<ul style="list-style-type: none"> • Acknowledge RE International are the owners of approximately 1.7ha of land to the south of South Way <u>which is subject of a current planning application</u>. The land falls within the draft masterplan area and the LB of Brent's Hub Study. • Recognises that the draft masterplan seeks to justify linkages outside the current Quintain outline planning application directly affecting clients' interests. <p>Overview Representations – Purpose of Masterplan The issues of consultation and flexibility are considered particularly relevant to the Wembley masterplan. We do not feel the draft masterplan as conceived</p>	<p>Draft masterplan seeks improve linkage within and outside the masterplan area.</p> <p>There is no statutory period for consultation on supplementary planning guidance documents such as this, but</p>

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				<p>adequately addressed the opportunities provided by the REI site. National Guidance, in particular, PPG12 Development Plans, is clear as to the weight that can be attached to Supplementary Planning Guidance and the importance that is placed upon formal public consultation.</p> <p>Support the principles of a Wembley masterplan providing a guide to site development within the Wembley CDA in particular the objectives set out in Chapter 2 – providing linkages that enable the extension of the town centre eastwards and promotion of uses to support Wembley’s role as an economic driver for Brent are fully supported.</p> <p>Concerns:</p> <ul style="list-style-type: none"> • In order to ensure adequate weight is given to the draft masterplan full consultation should be undertaken, REI and Bellway are committed to enter into this consultation process; • The draft masterplan is a post-justification for the outline planning submission proposals by Quintain, the masterplan should be agreed and established before the Quintain outline application is considered further; • The Quintain outline planning application in turn relies upon the masterplan for the resolution of the site edge conditions including those affecting REI’s land; • The draft masterplan has not been the product of inclusive consultation 	<p>the six weeks given is considered to be sufficient. The statutory period for consultation on the development plan, a much weightier document, for a local area is six weeks.</p> <p>The consultation was widespread, including statutory consultees, local landowners, local residents and traders. In all over 2400 letters were sent out. A small exhibition was also pinned up in the one stop shop providing a summary of the masterplan proposals. Additionally, REI were represented in the Steering Group for the Hub Study, looking at the feasibility of the town centre link.</p> <p>The draft masterplan is a requirement of the Wembley Development Framework. This was approved prior to the Quintain application being submitted. The consultation was inclusive as stated above.</p>
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					including REI as landowners and Bellway Homes as joint venture partners.	
					<p>Detailed Representations</p> <p><u>1 Introduction, paragraphs 1.1.7, 1.1.8 & 1.1.9</u></p> <p>Concerned the that Document seeks to justify Quintain’s proposals and designs on sites outside Quintain’s ownership and control, and in particular the REI site where the development potential as a result is restricted. It is therefore considered to be in conflict with the proper masterplanning aim to seeking the optimum solutions for all sites.</p> <p>A full public consultation exercise should have been conducted including the preparatory stages of the draft masterplan with full involvement of REI. The consultation exercise should be described in detail along with the weight to be given to the draft masterplan in considering future planning decisions. The consultation undertaken so far is insufficient.</p> <p>There are no alternatives assessed such as those proposed by REI only pre-determined layouts generated from the Quintain site and outline proposals.</p>	<p>Masterplan sets out an indicative design that will support Councils regeneration objectives on a number of sites within the CDA. The masterplan reflects the Hub study alignment for an improved link. Representatives of REI were involved in the process.</p> <p>The masterplan reflects the principles established in the Wembley Development Framework which was discussed at length with key stakeholders including REI.</p>
					<p><u>2. Objectives of the Masterplan Framework, paragraphs 2.1.4 & 2.3.3</u></p> <p>The objectives seek to justify the imposition of the proposed grid system street arrangement on the Wembley centre. The angular alignment of the boulevard has no local historical precedent and is considered crude, its extension across the other sites</p>	<p>The grid of streets provides a choice of routes through an area increasing the accessibility of the area. There is an historical precedent for a grid in this location.</p> <p>The boulevard alignment is an interpretation of a route linking the three stations.</p>

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					including the REI site is arbitrary and severe. .	.
					<p><u>3. Key Principles, paragraph 3.1.4</u> By including the Hub Study proposals into the draft the development potential of the west side of the REI site, where a landmark building is needed and sought, has been undermined.</p> <p>The Quintain layout does not: - not provide for appropriate direct views to the stadium, - create any true linkage, physical, movement or the visual connection to the stadium therefore it is in conflict and not compliant with the inherent strategy of the Hub Study Report.</p>	<p>The proposed indicative layout in the masterplan does not preclude development on to the west of the arrival space.</p> <p>The Council considers that the proposed indicative masterplan layout provides for a clear view of the stadium and creates an effective link with the High Road.</p>
					<p><u>5. Massing, paragraph 5.1.3</u> Quintain is reluctant to surrender any land or commercial space for true public benefit, which is has a direct view to the body of the stadium. Alternative design enclosed in REI site drawings.</p>	Addressed in responses already given.
					<p><u>11. Sub Areas Within Masterplan Framework, 11.2 South West Area – Stage 1A</u> Proposals seek to adopt the Quintain interpretation of the Hub Study proposals. The proposals are pre-determined, inflexible and make no attempt to reflect the input or views of the REI and Bellway proposals.</p>	The masterplan reflects the development principles set out in the Development Framework and the principles surrounding the alignment of the link in the Hub study. A representative of REI was involved in the Hub study and REI were consulted on the Development Framework
3	19/01/04	British Transport Police	Inspector Project Management	Michael Burnham	It is important that the Masterplan has input from the Strategic Rail Authority, TfL, Network Rail, rail operators and London Underground as to future railway and infrastructure improvements.	Organisations associated with the rail use have been consulted

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					<p>Highlight the importance of planned station infrastructure improvements within the Three Stations Strategy – that these are agreed and delivered on time (Sept 2005).</p> <p><u>Safety:</u> It will be important that the Quintain redevelopment and other construction sites in the regeneration area do not restrict pedestrian access on event days to and from the Three Stations.</p> <p>Fast food outlets, pubs, bars and café street furniture would not be positioned at potential 'punch points' which may restrict the flows of passengers returning to the Three Stations after a Stadium event.</p> <p>Architectural and planning decisions for the CDA should not be made without reference to designing out crime principles and the process of consulting with police should continue.</p> <p>Information provided on the new Civil Contingencies Bill published on 7th January 2004.</p>	<p>The Council recognises the importance of the improvements and timelines</p> <p>The Development Framework and Masterplan emphasise the importance of the effective operation of the area of during event days. This includes the design and layout of the public realm.</p> <p>There is a police design advisor that is consulted and provides guidance on safety and designing out crime principles. Designing out crime principles will be taken into account when deciding on planning applications in the development area.</p> <p>Information provided has been noted for future reference.</p>
4	13/01/04	College of North West London	Assistant Principal	Malcolm Rapier	<p>Note that own provision is commented on in paragraph 6.6.4 (page 14). Would like to advise that our discussions with Quintain are still on-going. We see ourselves in a relatively prime location delivering quality education and training to support the infrastructure and environment.</p>	<p>The Council acknowledges this</p>

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5	08/01/04	Chiltern Railways	Business Planning Manager	Stuart Yeatman	<p><u>Station Improvements</u> It is important that Council and developers involve Chiltern Railways and Network Rail in the design process to ensure that the specifications and implementation of station improvements satisfies the needs of passengers and rail operators. Chiltern Railways expect to see facilities improved at an early stage in the development process.</p> <p><u>Rail Capacity</u> Section 7.1.2 The available capacity of Chiltern services and the demand (bearing in mind that we offer the shortest journey time to central London and Wembley Stadium Station is the nearest station to the centre of the development) have been understated.</p> <p>The masterplan must acknowledge that Chiltern Railways services are generally full travelling into and out of London during peak times. Consequently there is no spare capacity to accommodate the peak travel needs of those people living and working in the new development. We ask that the transport assumptions, in so far as they relate to Wembley Stadium Station and Chiltern's services, be thoroughly re-examined to ensure that they are correct.</p> <p>We expect the development to fully fund improvements that are required to the station.</p> <p>Don't agree with statement in</p>	<p>The Council acknowledges the importance of involving Chiltern Railways and Network Rail in proposals to improve stations.</p> <p>This is noted.</p>
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					<p>paragraph 7.5.2 '...that in terms of public transport capacity, future demand would be adequately catered for'.</p> <p>Wembley Depot It is important that the masterplan recognises that road access will be required through the area on a 24 hour, 7 days and week basis to South Way and the road bridge. This is in order to serve the train stabling facility to be built to the east of Wembley Stadium Station (planning permission granted May 2003).</p>	<p>The Council recognises South Way as a key access route and important to the vehicular circulation in the area. Though it will be closed on event days (approximately 30 days out of the year), it will remain open at all other times, unless closed for emergency purposes or for safety reasons.</p>
6	13/01/04	Environment Agency	Planning Liaison Officer	Katie Wilkinson	<p>Development Control and Flood Risk Building in flood plains The site of this development is bound by the indicative flood plains of the Wealdstone Brook and River Brent. No reference to flood risk or flood plain related issues has been made in this Wembley Masterplan but is required. The area of the proposed development may be at direct risk of flooding and may increase the flood risk elsewhere.</p> <p>Agency is likely to object to any proposed development located within the flood plain and in accordance with PPG25. Flood Risk Assessments (FRAs) should be provided in support of applications which fall within areas of flood risk.</p> <p>Suggest that the Council undertake a Strategic Flood Risk Assessment (SFRA) for the Wembley Area to</p>	<p>The Council will refer to this aspect in the masterplan.</p> <p>The Council acknowledges that Flood Risk Assessments should be provided for applications that fall within areas of floodrisk.</p> <p>Noted</p>

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					<p>identify flood zones and the appropriate development.</p> <p><u>Building in close proximity to watercourses</u> Under the terms of the Water Resources Act 1991 and the Land Drainage Byelaws 1981, the prior written consent of the EA is required for any proposed works or structures in, under, over or within 8 metres of the brink of the River Brent and Weald Brook (Main Rivers).</p> <p><u>Surface water drainage requirements</u> A sustainable approach to the surface water drainage system is required.</p> <p>Biodiversity There is virtually no mention of the natural environment in the Wembley Masterplan. There may be opportunities within the development to revitalise the river corridors and incorporate further green corridors through enlargement and/ or appropriate management of existing habitats and through creation of new habitats.</p> <p>Environmental Management Advise that the construction of the development drainage system shall be carried out in accordance with details submitted to and approved in writing by the Planning Authority before the development commences. The EA should be consulted on these drainage plans.</p>	<p>Noted</p> <p>The issue of biodiversity will be addressed in the revised document.</p> <p>Noted</p>
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					<p>The Oil Storage Regulations 2002 and waste management issues should be considered for the development.</p> <p>Groundwater and contaminated land The EA advises that before development commences an investigation to establish if the area is contaminated, to assess the degree and nature of any contamination which may be present, and to determine the potential for pollution of the water environment.</p> <p>Advises that under s.30 of the Water Resources Act 1991 the developer is required to inform the Environment Agency of any intention to dewater an excavation.</p>	Noted
7	16/01/04	GVA Grimley International Property Advisers	On behalf of Cricklewood Regeneration Limited	Mark Pender and Neil Jones		Comments withdrawn 24/02/04

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8	16/01/04	Harrow Council	Forward & Local Planning Manager	Bill Munro	<p><u>Massing</u> View is that the new stadium as the dominant feature on the skyline is in danger of being compromised or weakened if over-tall buildings are placed too close to it as is proposed.</p> <p><u>Land Uses</u> The objective of having retail uses which complement the current town centre offer is appropriate, however, the draft refers (paragraph 6.3.3) to the re-provision of the Wembley Retail Park, and this is of concern as at present it is a predominantly car-borne facility which would surely not tie in with the transport strategy if simply re-provided.</p> <p><u>Transport</u> Concern that there should not be too</p>	<p>The guidance in this document and the Framework is quite specific about development massing and heights. The stadium is an iconic building and will be framed by development. The masterplan states that buildings will generally be no higher than the plinth of the stadium, allowing the roof to “float” above them. To the south west of the Stadium, however, tall buildings would be acceptable as a cluster in order to provide added interest to the urban form.</p> <p>Response to Land Uses: The long term vision for the Wembley</p>

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					<p>great an emphasis on car users for the various land uses and activities planned.</p> <p>Public transport should be maximised and resident and workers discourage for owning/using cars.</p> <p>Interested in the funding of transport improvements mentioned in section 7 which is not clear.</p>	<p>Retail Park is for the site to be redeveloped. In the short term, however, it is feasible that it would remain and the Council would consider proposals for improvement.</p> <p>Response to Transportation: The Council's transportation strategy seeks to encourage public transport and discourage reliance on the car..</p> <p>Response to Transportation Funding issue: The Council recognises that local infrastructure needand will be identifying possible funding sources within the document.</p>
9	19/01/04	Metropolitan Police	Senior Projects Manager	Graham Fulcher	<p>We view that a successful masterplan must incorporate a dynamic transport strategy.</p> <p><u>Section 2.1.1</u> The MPS agrees that linkage to and from the National Stadium should be improved and accessibility through and to the site improved.</p> <p><u>Section 2.1.3</u> The extension of the town centre towards the east is felt to be beneficial from an operational perspective of policing the stadium. Any physical linkage should take into account and support the Mayors/MPS casualty reduction programmes.</p> <p><u>Section 3.1.3</u> The new boulevard must prevent,</p>	<p>The Masterplan shows a network of vehicular and pedestrian routes. The primary pedestrian route is the promenade linking the three stations. Although the avoidance of the pedestrian vehicular conflict is desirable, this route does cross a number of roads – Wembley Hill Road, South Way and Fulton Road; Engineers Way is crossed via the pedway. At all</p>

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				<p>wherever possible, pedestrian – vehicular conflict.</p> <p><u>Sections 3.5.1 & 3.5.2 Olympic Way</u> Much work is needed to ensure a safe and pleasant arrival at the venue. The design of Olympic Way for egress will become crucial to the safety of the public, with the increase in spectator traffic the need for improved lighting and CCTV is essential. Redevelopment of Olympic Square is required as currently it is unsuitable for large amounts of pedestrian traffic.</p> <p><u>Section 3.7.1</u> Access routes must be maintained for normal traffic and emergency vehicles preventing the unnecessary closure of roads.</p> <p><u>Sections 6.1.2 & 6.6</u> The MPS supports the objectives based on the “Vision for Wembley” produced in 2002 and the improvement to the cultural community and education facilities.</p> <p><u>Sections 6.2.4 to 6.2.4</u> The MPS wish to be consulted on all proposed usages of new buildings within the complex so a measured response undertaken.</p> <p><u>Section 6.7.1</u> Designs that follow the “Secure by Design” theme and early consultation with Crime Prevention Design Advisors of the MPS is deemed essential. The MPS wish to make</p>	<p>these points, at grade crossing facilities will be in place, managing the interaction and between pedestrians and vehicles. The alternative would be to provide a bridge or and underpass, but these structures are both expensive and can create problems for policing on event days.</p> <p>The Development Framework and Masterplan highlight the need to undertake improvements to Olympic Way.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>The Wembley Development Framework and the Masterplan promotes the principles behind designing out crime. The Police have been consulted and, because of the operation of the</p>
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					recommendations to the local authority in relation to s.106 funding for improvements in the area in relation to public safety and supporting law and order.	stadium, are actively involved in discussions on the development of the area. Possible funding sources for these and other works will be outlined.
10	19/01/04	Nathaniel Lichfield & Partners		Nicholas Thompson	Ref to letter of 13 th January 2004 Ask for confirmation on the situation of considering the draft Framework and the phase 1 current application.	
11	05/01/04	The Countryside Agency	Director	Terry Robinson	Advise that they are not in a position to comment on the draft masterplan document.	
12	16/01/04	The Twentieth Century Society	Caseworker	Claire Baret	Generally support the proposals which include the Grade II listed Arena. The proposals for this building seem sensible but we will wait to comment on a detailed listed building application. While the visualisations including a new build hotel (W03) does not encroach on Olympic Way the masterplan drawings show the hotel as considerably wider. Olympic Way should be retained as a key route. The Society feels that Olympic Ways importance should be recognised and that the size of the hotel should respect this element of the original design. Note that the outline application draws a line which excludes the listed Palaces of Arts and Industry. While these buildings are not therefore part of this application, it is inevitable that application will follow which address their use and refurbishment, or otherwise.	The Masterplan states that buildings will generally be no higher than the plinth of the stadium. In response to TCS's concerns, Olympic Way is among those in the founding street arrangement of 1925 and will remain so, as it is currently represented in the masterplan. Refers to application. Response: To Conservation Concerns

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					<p>The Society has been approached to give comment on the proposed de-listing of these buildings, which it has opposed. Remain firm in the opinion that these are very good buildings which still deserve statutory protection, and fell it is a great shame that they have not been included within this application, in order to create a wide and all encompassing brief.</p>	<p>The Secretary of State's decision to de-designate the three buildings in question is a pronouncement that remains beyond the Council's jurisdiction.</p>
13	19/01/04	Wembley Resident 55 Mostyn Avenue Wembley HA9 8AY	R Wheeler		<p>Believe the infrastructure of Empire Way, Wembley Hill Road and Wembley High Road will be unable to cope with additional traffic that the development attracts.</p> <p>In observing the document no plans from Scott Wilson where included for the widening of Empire Way to accommodate the extra traffic.</p> <p>Concerned that with the extra people, flow of traffic from Wembley Stadium area and Stadium Station, Wembley Hill Road will become gridlocked during rush hours.</p> <p>Concerned that development of Wembley Central Station without the widening of the High Road where the road crosses over the railway will cause havoc. Asks if the Council have plans to ease the traffic at this point.</p>	<p>The Council will consider the impact of the developments through Transport Assessments which are likely to be required as part of any submission,</p> <p>The general approach, however, is to reduce the reliance on private transport and increase the reliance on public transport use, given the good accessibility in the area.</p> <p>Response: The Council seeks to transfer the focus on car reliance to maximising the use of public transport by improving infrastructure, such as making major improvements to all three rail stations.</p>
14	23/12/03	Wembley Stadium	Chief Executive	Michael Cunnah	<p>Acknowledge consultation letter and state that they are unable to comment within timeframe set at this stage.</p>	<p>Nothing further has been received</p>

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15	02/02/04	CABE	Design Review Advisor	Sarah Jackson	<p>The design review committee applauds the high quality of the ambitions and aspirations for the masterplan. The committee noted that the formal axial layout with dense urban blocks was an urban type relatively unfamiliar in London, and its form and severity might initially feel alien. However, as these models work successfully in Europe, the committee see no reason why, if treated carefully, this scheme could not match the success and vitality of continental examples.</p> <p>The success of the scheme does depend on the interfaces with adjoining sites outside the ownership of the client, particularly in relation to the connections with the stations, and of the quality of the stations themselves. Historically, development issues in the area to the south west of the stadium, near Wembley Stadium station, have been difficult to resolve, and we would urge close dialogue with all the parties concerned.</p>	<p>Noted. The masterplan propose improved linkages with adjoining land In particular the masterplan addresses the need for an effective link to the town centre/High Road</p>
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