



Planning Committee

12th July 2011

Report from the Assistant Director, Planning & Development

Wards affected:
Wembley Central, Tokyngton, Barnhill,
Preston, Stonebridge

Report Title: LDF - Wembley Area Action Plan

1.0 Summary

- 1.1 Having adopted the Core Strategy of the LDF in July 2010 and with the Site Specific Allocation DPD to be adopted this month, it is now proposed to produce a Wembley Area Action Plan as agreed by the Executive in November 2010. This report explains progress to date and how it is proposed that the Plan be taken forward.

2.0 Recommendations

- 2.1 That Planning Committee notes the proposals for processing the Area Action Plan to adoption. Members are invited to consider the key issues identified and suggest additional issues for inclusion in the consultation document.

3.0 Detail

Introduction

- 3.1 The proposal to produce an Area Action Plan (AAP) derives from the need to bring UDP policy, particularly the Wembley Regeneration Area chapter first drafted in 2000 and adopted in 2004, up-to-date. It was a commitment made by the Council at the beginning of the LDF process in 2005 and is a logical step in drawing up the folder of Development Plan Documents (DPDs) that will make up the LDF and ultimately supersede the UDP. The policies in the proposed AAP will include more detailed requirements for development than in the Core Strategy. It has also been made clear to stakeholders such as Quintain, in the examinations of both the Core Strategy and SSA DPD, that an AAP will be produced which brings forward more detailed policy for

sites within their ownership, and this commitment is reflected in the Core Strategy, paragraph 4.42. The production of the AAP will also consolidate detailed policy and guidance currently contained in a number of documents.

- 3.2 It should be borne in mind, however, that there will continue to be a need for more detailed guidance outside of the development plan in SPD, such as that in the Wembley Masterplan and the Wembley Link SPD. The rationale for ensuring key policies and proposals are in a DPD is that this gives them greater weight, and more certainty about what will happen for developers and the community, as they will have been through a more rigorous process, including examination.

Progress to date

- 3.3 Officers have begun the process of gathering evidence and are currently drafting Issues and Options papers which it is intended will form the basis of the initial public consultation. Views will be sought from residents and other stakeholders on what they think ought to be in the Plan. It is intended that this consultation will take place in September. A sustainability appraisal also has to be carried out. During consultation the appraisal results of all of the policy options will be available. The proposed boundary of the AAP is shown in appendix 1.

Vision and Objectives

- 3.4 The Vision and objectives for the Plan are largely dictated by the Core Strategy and the Wembley Masterplan. There are also key policies in the Core Strategy, particularly policy CP7 dealing with the Wembley Growth Area, which determine what the basic strategy for the area is. This includes targets such as the number of homes to be built (11,500 from 2007 to 2026) of which 50% should be affordable, a target of 10,000 new jobs and a range of new development including expansion of the town centre eastwards. All this is to be supported by new infrastructure including, for example, new schools, new health facilities, new public open space, a new community pool and a new combined heat and power plant if financially viable.
- 3.5 The AAP will bring forward the detailed policy to achieve this as well as reviewing some existing policy such as the extent of the protected employment area (called a Strategic Industrial Location) and how better access to the area can be achieved. A number of issues have already been identified for consideration during the public consultation as set out below. It is intended that these will be added to and refined before the final consultation document is agreed.

Issues

Transport

- 3.6 *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?*

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.

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

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.

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

Parking provision can be used as a mechanism for implementing a policy of restraint on car usage and promoting other 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. 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.

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

Given the significant progress towards implementing the Three stations Strategy, the issue now is how to deliver further improvements to public transport at Wembley. Further improvements at Wembley Central and Wembley Stadium stations are needed but the key improvements necessary as identified in the Core Strategy are to orbital services linking to Brent Cross and Ealing. It is Brent Council's view to date that such orbital improvements should be focussed on bus services.

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

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.

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

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.

Urban Design & Placemaking

3.12 *What is the appropriate character & urban form for Wembley?*

The vast amount of development already undertaken or given permission is of a similar scale and typology. 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.

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

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).

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

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.

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

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.

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

The Masterplan seeks to secure one significant permanent art work 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.

Open Space, Sports & Nature Conservation

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

The new park in Wembley will be the principle 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 Core Strategy states that the new park should be at least 1.2ha in size. In addition to the new Wembley park, a series of pocket parks are required which should be well connected to provide sufficient open space within a densely populated area.

3.18 *What other open space improvements should there be?*

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

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

Brent Open Space Report – PPG17 Assessment identifies a local standard of 1 new allotment plot per 200 people. The report recognises the constraints in providing new allotment plots and that food growing opportunities can also be incorporated into new housing development by providing growing space at roof level.

3.20 *What sports facilities improvements are needed in Wembley?*

The council expects to secure a new community swimming pool and health and fitness centre as part of the redevelopment of Dexion House, Empire Way. The council has recently laid out football pitches and a new MUGA at King Edward VII park. Other sports facilities will be needed and these could be delivered in a number of ways, including council capital investment, access to school facilities and funding from development:

3.21 *How and where should play provision be increased?*

There is a shortage of play provision in Wembley. 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.

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

There are limited areas of nature conservation value in Wembley, reflecting it's built up urban character. 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.

Town Centres and Shopping

3.23 *Should policy seek to prevent adverse impact of new retail development on existing or proposed shops in the town centres of Wembley and Wembley Park?*

New retail development outside of the town centre could potentially have a harmful impact on existing shops in the town centres. However, it could be accepted that new retail development outside of the town centres is just as accessible and will help to bring additional custom and trade to Wembley as a whole and thus benefit the wider area.

3.24 *Should the town centre boundaries be re-defined to include a wider area?*

The definition of the town centre boundary is important in determining where proposed major new retail development, and the development of other town centre uses, is generally acceptable. This could, for example, take into account existing planning

consents and identify an area which stretches from Forty Lane to Ealing Road. This may, however, be defining too large an area which could never be cohesive and would spread development too thinly rather than focussing it in the core location where a critical mass of development could ensure viability.

- 3.25 *Is it desirable that planning policies should help promote parts of the town centre as distinctive locations serving different sections of the community?*

Clearly Wembley is developing as distinct areas serving different markets including, in some cases, different sections of the community. It may be possible to promote and enhance these distinctions through planning policy.

- 3.26 *Should temporary uses be acceptable on unused or underused sites and properties and what sort of uses will be acceptable?*

There are a number of sites in Wembley, such as land adjacent to Wembley Stadium station, where development is unlikely to be brought forward in the short-term. It may be possible to bring some of this land into beneficial use by promoting it for temporary uses which could also help foster community cohesion and/or attract visitors to the area, as well as improving the environment.

- 3.27 *Is it reasonable to introduce stricter controls for fast food outlets/takeaways (A5 uses) in parts of Wembley?*

There has been some evidence that stricter planning controls over take-aways in particularly sensitive locations, such as close to schools, can deliver health benefits. Wembley experiences particular demand for such outlets from the visitors to the area to major events at the Stadium and Arena.

Business, Industry & Waste

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

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.

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

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. It may, therefore, be considered reasonable that there should be a limit on the proportion of land devoted to such uses.

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

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.

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

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.

Housing

3.32 *Should the Plan include specific housing mix guidance which differs from that contained in the Core Strategy (25% 3+ bed and balanced housing stock)?*

It is a concern that schemes coming forward in the area are failing to deliver the mix of development required by the Core Strategy and the masterplan suggesting that a more specific or different mix policy may be appropriate for the Wembley area. There may be opportunities within the area to increase the proportion of family sized accommodation.

3.33 *Does the Wembley area provide an opportunity to increase the amount of supported housing being provided in the borough?*

Brent's Extra Care Housing Strategy identifies demand for 300 units of extra care accommodation over the period 2010-15. Given that the Wembley growth area is to provide half of the Boroughs new housing it may be considered appropriate that it should also provide half of the need for extra care homes. On the other hand the particular vision and objectives identified for Wembley regeneration area may not lend itself to the development of extra care housing locally.

3.34 *How much purpose-built student accommodation is it appropriate to provide in Wembley?*

There has been a lot of demand for student accommodation to be built in Wembley in recent years and consent has been given for over 2,600 beds. There is evidence that there is demand for further provision. The issue is whether there is a saturation level

at which the development of further student accommodation may become a problem, particularly if it is provided at the expense of other uses including housing meeting a known local need.

Social Infrastructure

3.35 *Where and when should new primary school accommodation be provided?*

Core Policy 7 anticipates the need for 2 new 2-form entry primary schools to serve Wembley Growth Area. A minimum area of 0.5 hectares is required for a 2-form entry primary school. The council is unlikely to have resources to purchase a site of this size so options for locating a new primary school are limited.

3.36 *Where and when should space for new health facilities be provided?*

Population growth from new housing development will need additional health services. For Wembley it is estimated that space for 14 GPs and 11 dentists will be needed by 2026 . There are a number of options as to how this space could be provided, for example it could be provided as one large combined health facility or dispersed across the Wembley area as smaller GP facilities.

3.37 *What priorities should the Council establish for funding social infrastructure?*

The range of social infrastructure required to support communities in the Wembley area will require a significant level of investment. Development will offer some funding in the form of the Community Infrastructure Level (CIL) but there will be other demands on CIL such as transport and parks and open space.

Energy, and Climate Change Mitigation & Adaptation

3.38 *How can carbon emissions from the Wembley area be minimised?*

In order to help meet national and local targets for reducing carbon emissions, measures should be incorporated into the Plan.

3.39 *Is a Wembley District Energy Network desirable and how can it be implemented?*

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.

3.40 *How should climate change adaptation be implemented in Wembley?*

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. The main climate change impacts on London will be overheating (urban heat island effect), water

scarcity, flooding, severe weather events and more frequent heatwaves. 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.

Timetable for Preparing the Area Action Plan

- 3.41 The timetable for preparing the area action Plan has, because of a reduction in available staff resources, changed from that originally agreed by Executive in November 2010. Below is set out the latest estimated timetable

Evidence Gathering	ongoing – Dec 2011
Consultation on Issues and Options	Sept 2011
Consultation on Draft Plan	Feb 2012
Pre- submission Consultation (Publication)	May 2012
Submission	Aug 2012
Examination Hearings	Dec 2012
Adoption	July 2013

The intention is to bring a draft Plan back to Planning Committee for consideration prior to it going out on public consultation in early 2012

4.0 Financial Implications

- 4.1 The preparation and ultimate adoption of an Area Action Plan will provide a more up to date statutory Plan which carries greater weight in making planning decisions, which leads to fewer appeals and reduced costs associated with this. It also provides greater certainty for developers who are more likely to bring forward sites for development in the knowledge that schemes which comply with the requirements of the Plan have a good chance of receiving planning consent.
- 4.2 The costs of preparing the WAAP will be met mainly from Planning & Development budget.

5.0 Legal Implications

- 5.1 The preparation of the LDF, including the Wembley AAP, is governed by a statutory process set out in the Planning and Compulsory Purchase Act 2004 and associated Government planning guidance and regulations. Once adopted the DPD will have substantial weight in determining planning applications and will supersede part of the UDP.

6.0 Diversity Implications

6.1 Full statutory public consultation will be carried out in preparing the DPD and an Impact Needs / Requirement Assessment (INRA), which assessed the process of producing the LDF, was prepared and made available in 2008. An Equalities Impact Assessment will be prepared to accompany consultation on the draft Plan.

7.0 Staffing/Accommodation Implications

7.1 The reduced level of staff available to work on the Plan means that it is not possible to bring it forward according to the timetable agreed by Executive in November. Future progress will be dependent upon priorities identified for limited staff resources.

8.0 Environmental Implications

8.1 The DPD deals with the development of the Borough's main regeneration area and thus will have a significant effect on controlling impacts on the environment including requiring measures to mitigate climate change. Sustainability appraisal will be undertaken at all stages of preparing the DPD.

9.0 Background Papers

Brent Core Strategy July 2010
Brent Site Specific Allocations Development Plan Document
Wembley Masterplan, June 2009

Contact Officers

Any person wishing to inspect the above papers should contact Ken Hullock, Planning & Development 020 8937 5309

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Appendix 1 – Area Action Plan Boundary

