

18 March 2016

VDC/Careys Site, Wembley

in the London Borough of Brent

planning application no. 15/5615

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

The proposal

The proposal is for a dual level parking facility providing space for a maximum of 290 coaches. The total GEA for the structure is 26,748 sq.m.

The applicant

The applicant is **Quintain PLC**, the agent is **Signet Planning**, the Architect is **Leslie Jones Architects**.

Strategic issues

At stage 1 this application raises issues in relation to **transport, car parking, design, access** and **flood risk**.

Recommendation

That Brent Council be advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 49 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 28 February 2016 the Mayor of London received documents from Brent Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 17 March 2016 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 3F Car parking Spaces of the Schedule to the Order 2008:

- *3F: Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use.'*

3 The application also relates to the Wembley masterplan & Blue Car Park Multi-storey Car Park application D&P/3665/01 for this reason paragraph 2 and 3 of The Town & Country Planning (Mayor of London) Order 2008 are relevant:

(Para 2). If the local planning authority receive an application for planning permission for development, which they consider forms part of more substantial proposed development, on the same land or adjoining land, they must for the purposes of this Schedule treat that application as an application for planning permission for the more substantial development.

(Para 3.) In deciding whether to treat an application for planning permission (referred to in this paragraph as “the relevant application”) as an application for planning permission for more substantial development, a local planning authority must take into account other development of the same land or adjoining land —

(a) in respect of which an application for planning permission has been made but not finally determined on the date the relevant application is received by the local planning authority;

(b) in respect of which planning permission has been granted within the period of five years immediately preceding that date;

(c) substantially completed within the period of five years immediately preceding that date.

4 Once Brent Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

5 The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 The VDC Careys site is located to the south of South Way, in Wembley. The site area is 1.76 hectares and comprises brownfield land, currently used as a surface level car park on Stadium Event days. The land is situated to the immediate east of the Pop-in site and to the immediate west of Carey House. Motor repair units are to the north of the site and the Chiltern Railway Line runs to the south. As part of the proposals, access is retained for Network Rail to the tracks and a maintenance shed.

7 The site is located on South Way, to the southeast of the Wembley National Stadium. The site has a public transport access level (PTAL) of 1b (out of 1 to 6 with 1 being the worst and 6b being the best). There are two (2) bus services operating in the vicinity of the site: bus route 206 and 92, which have frequencies of 5 and 7.5 vehicles per hour respectively. The nearest rail/underground stations are Wembley Stadium to the west of the site and Wembley Park station to the north of the site. Both stations are however outside of 12 minutes’ walk of the site and therefore explain the site’s poor PTAL.

8 The nearest strategic road is the North Circular Road (A406) which forms part of the Transport for London Road Network (TLRN); approximately 1.4kms to the east of the site. Access to/ from the North Circular Road (A406) is via South Way and Great Central Way, both borough roads.

Site/Case history

9 The application proposals have been subject to a pre-application meeting on the 14 January 2016 and no meeting note was issued because the applicant was advised that a detail transport pre-application meeting with TfL was required to fully explore the development issues. Assurance was however requested that the parking issues relating to Wembley Stadium should be fully addressed in its applications.

10 The application is linked to a hybrid application consisting of an outline planning application for demolition of existing buildings on site and the provision of up to 420,000 sq.m. gross of new land use floorspace (across 15.87 ha) within a series of buildings, with the maximum quantum as follows:

- A1-A4 Retail: 21,000 sq.m. gross;
- B1 Commercial: 82,000 sq.m. gross;
- C1 Hotel: 25,000 sq.m. gross;
- C3 Residential: 350,000 sq.m. gross (approximately 4,000 units);
- D1 Education, healthcare and community facilities : 15,000 sq.m. gross;
- D2 Assembly and leisure: 23,000 sq.m. gross;
- Sui Generis student accommodation: 90,000 sq.m. gross.

11 Notwithstanding the above breakdown, the maximum quantum of floorspace by land use overall will always be 420,000 sq.m. GEA.

12 The development will also provide associated open space (including a new public park) and landscaping; car and coach parking spaces (for residential – up to 55,000 sq.m. gross - and non-residential – up to 80,000 sq.m. gross).and cycle storage; pedestrian, cycle and vehicle access (including a new pedestrian access to York House from Royal Route); associated highway works; and associated infrastructure including water attenuation tanks, an energy centre and the diversion of any utilities and services to accommodate the development. Internal plant, refuse, cycle stores, residential lobbies, circulation and other residential ancillary space will comprise a maximum of 20,000 sq.m. gross in addition to the C3 total set out above.

13 In addition to the proposals in outline application the following element is provided in full:

- A multi-storey car park on Plot E05 of 62, 558 sq m GEA providing:
- 1,816 car parking spaces including blue badge spaces;
- Up to 82 coach parking spaces.
- Associated infrastructure, landscaping and vehicular access.

14 Of the 1,816 car parking spaces, 1,642 are for non-residential purposes and 174 are for residential use.

Details of the proposal

15 The proposal is for a dual level parking facility providing space for a maximum of 290 coaches. The structure will be 26,748 sq.m GEA in a building over two levels.

16 The site level change on South Way allows vehicle access to the upper level to be at grade at the western side of the site and vehicle access to the lower level to be at grade on the eastern side of the site. Vehicle access to the upper level will be via a vehicle ramp located centrally along the northern boundary of the site, off South Way via an existing crossover. The

vehicle ramp has a gradient of 1:12 and is approximately 9.4m in width. Vehicle access to the lower level will be via the same access but then via a different vehicle ramp, which has a gradient of 1:15 and is approximately 8 metres in width. Both vehicle accesses will be for the sole use of vehicles with pedestrian and cyclists prohibited from using them.

17 Vehicle egress from the upper level will be via a vehicle ramp in the north-west corner of the site onto South Way via an existing crossover, to the east of the pedestrian ramp. This ramp has a gradient of 1:12 and is approximately 6 metres in width. Vehicle access from the lower level is at grade and is directly onto South Way in the north-east corner of the site via an existing crossover.

18 Pedestrian access and egress will be via a pedestrian ramp onto South Way located in the north-west corner. The ramp is 14 metres in width with a gradient of 1:20, with level rest areas of 1.5 metres every 10 metres. The ramp has a flow rate of 1,148 people per minute, potentially reducing to approximately 1,033 people per minute to take account of the ramp. Pedestrians can then access the vehicles via the five cores provided in the parking facility.

19 When in operation management staff will guide pedestrians when disembarking from coaches and exiting towards the Stadium and when re-entering and boarding coaches. Advisory directional signage will also be located throughout. Two security checkpoints lay-bys are provided on South Way to enable random checks of coaches.

20 The existing vegetation along the southern boundary of the site will not be altered by the proposals and gated vehicular access to the railway land to the south is maintained. Several areas of landscaping are provided along the northern boundary adjacent to South Way.

Strategic planning issues and relevant policies and guidance

21 The relevant strategic issues and corresponding policies are as follows:

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|---------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| • Transport | <i>London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG</i> |
| • Crossrail | <i>London Plan; Mayoral Community Infrastructure Levy; Crossrail SPG</i> |
| • Parking | <i>London Plan; the Mayor's Transport Strategy</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context;</i> |
| • Access | <i>London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)</i> |
| • Air quality | <i>London Plan; the Mayor's Air Quality Strategy;</i> |
| • Sustainable development | <i>London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy</i> |

22 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area are the Brent Core Strategy (2011), the Site Specific Allocations DPD (2011), saved policies from the Brent Unitary Development Plan (2004) and the 2015 London Plan (consolidated with alterations since 2011).

23 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework
- Brent Council, Site Allocations DPD & Saved UDP Policies
- Wembley Area Action Plan (2014)

Principle of development

24 Wembley is designated in the London Plan (Table 1,1) as an Opportunity Area and is expected to deliver around 11,500 new homes and 11,000 new jobs. The OAPF for the area is in this instance provided by the Wembley Area Action Plan (AAP, which sets out the strategy for growth and regeneration for Wembley over the next 15 years. The AAP has been through several rounds of consultation and was approved in January 2015. GLA officers assessed the principles and policies at a strategic level and the plan was found to be in accordance with the London Plan and supported by the Mayor.

25 The applicant is the largest landowner across the Wembley Opportunity Area and has recently submitted a hybrid planning application for the Wembley Park Masterplan (D&P/3665) for the comprehensive redevelopment of 15.87 hectares. The VDC/Careys site car park proposal is directly linked to the development to the hybrid masterplan application, this is because the existing Green car park adjacent to Wembley Stadium and parking on Wembley Retail Park is displaced as a result of the Masterplan proposals. As a result, the proposals for VDC Careys will only be implemented in conjunction with the Wembley Park Masterplan.

26 The applicant has a legal obligation to provide car and coach parking for Wembley Stadium events. The obligation requires parking for 458 coaches, 43 mini-buses and 1,200 cars (or a combination thereof not to exceed the equivalent space for 2,900 cars in total). The quantum was permitted in 2002 as part of the Planning Permission for Wembley Stadium (Ref. 99/2400). The VDC Careys planning application forms part of the 2015 Masterplan Event Parking Strategy, as cumulatively VDC Careys and the Masterplan proposals provide for up to 458 parking spaces for 12 metre coaches, 43 mini-buses, 1,200 cars or 2,900 cars or any combination thereof. The combined proposals do not increase the number of parking spaces available for Stadium Event parking.

27 In considering the application proposal and that for the Wembley Masterplan consideration needs to be given to operation of Wembley Stadium and its ability to attract global sport and non-sport events. GLA officers have held a meeting with Wembley Stadium owners, they have raised concerns over the approach to the re-providing of the obligated car parking requirement on the two proposed sites at VDC/Caryes and a new multi-storey car park which is part of a podium development adjacent to the stadium (Plot E05). Wembley Stadium PLC concerns relate primarily to the efficiency and functioning of the adopted approach and that this could damage Wembley Stadium's ability to attract major global events.

28 London Plan Policy 2.1 London in it Global, European and United Kingdom Context indicates the importance of London's 'leading role in the UK's visitor economy, as a gateway to the rest of the country', whilst Policy 4.5 London's Visitor Infrastructure gives support to the status of Wembley Stadium as a globally important sport/ non-sport facility.

29 Notwithstanding the concerns of Wembley stadium, it is officer opinion that the removal of the extensive area of surface parking around the Stadium and at the retail park is a strong feature of the masterplan strategy and this should not be compromised. The principle of providing the parking facility to help facilitate the delivery of the masterplan is supported by the Wembley AAP and London Plan policy. The applicant should however continue to work with Wembley Stadium

PLC to establish a parking solution that meets the requirements of both the delivery of the masterplan and the operation of Wembley stadium.

Transport

30 The proposal involves relocation of part of the event day coach parking for Wembley National Stadium from its current location in the Green Parking Zone (northeast of the stadium) to the VDC-Careys site located to the southeast of the stadium. The VDC-Careys site will be developed to accommodate up to 290 coach parking spaces of the maximum 458 coach parking spaces that the applicant is legally obligated to provide for the stadium.

31 The relocation of part of the coach parking from the Green Parking Zone to the VDC-Careys site is driven by the revised Wembley Masterplan proposal, which entails the comprehensive redevelopment of the site around the stadium to provide new land uses, open spaces and public realm enhancements.

32 The revised Wembley Park Masterplan proposal is the subject of a separate planning application (Brent Council Ref: 15/5550) that is currently under consideration by Brent Council. TfL provided detailed comments to Brent Council on 26 February 2016 and a Stage 1 GLA report (Ref: D&P/3665) dated 18 March 2016. The revised Wembley Park Masterplan proposal and the VDC-Careys site both accommodate a proportion of the maximum 458 coach parking spaces for the stadium and should therefore be considered as interconnected proposals.

33 The proposed changes to the Green Parking Zone under the revised Wembley Park Masterplan proposal includes a reduction in the footprint of the Green Parking Zone. The revised Wembley Park Masterplan will retain car parking in the Green Parking Zone but in the form of a new multi-storey car park (Blue MSCP) and coach parking for up to 168 spaces provided at grade beneath the residential block referred to as Canada Court.

34 It should be noted that in the Stage 1 response to the revised Wembley Park Masterplan TfL has sought clarification on the exact number of permanent coach parking spaces to be accommodated in the Green Parking Zone. The full application for the Green Parking Zone submitted as part of the revised Wembley Park Masterplan proposal is for 82 coach parking spaces in the Green Parking Zone and not the full 168 coach spaces proposed in the end state. Clarification for the shortfall should therefore be provided.

35 Vehicle ingress and egress for the VDC-Careys site proposal consists of three (3) vehicle access points. The two (2) outer vehicle accesses will allow both ingress and egress, depending on the specific arrangement for traffic routing during events at the stadium. The middle access, adjacent to the junction of Second Way with South Way provides entry only for coaches accessing both the lower and upper decks. Ingress only at the middle access is proposed to overcome poor lateral visibility at this location. The swept path diagrams included in the lower and upper deck plans demonstrate that coaches can easily manoeuvre in and out of the site. Additionally, the plans show the internal circulation and emergency routes for coaches. The access, internal circulation and emergency routes are considered to be acceptable.

36 In terms of pedestrian routes, the VDC-Careys site is farther from the centre of the stadium than the Green Parking Zone and therefore increases the walking distance to the stadium for spectators accessing the stadium. However, the location of the VDC-Careys site meets the requirements of Wembley Area Action Plan (WAAP) Policy WEMP 17, with respect to the maximum distance (960 metres) of coach parking from the centre of the stadium. TfL is therefore satisfied that the VDC-Careys site proposal for the most part complies with the principles for coach parking

set out in policy WEMP 17 but is concerned that coach parking in the VDC-Careys site will result in conflict between pedestrian egress flows and vehicles at the junction of First Way/ South Way.

37 The pedestrian flow analysis referred to in the transport assessment was not included in the appendices. This document was supplied by the applicant at the time of writing and is therefore under TfL's consideration. Based on historic analysis of event day coach parking (between 2009 and 2015) it is assumed that coach parking demand for all but 6 events of the maximum 37 annual events allowed at the stadium can be accommodated within the capacity of the Green Parking Zone (168 coaches). Unless the use of the VDC-Careys site is limited to a certain number of events per year, by legal agreement or included in an overarching event day management framework, it is assumed that the VDC-Careys site would accommodate coach parking for all events at the stadium.

38 The pedestrian flow analysis assumes that coach parking in the VDC-Careys site will be allocated to spectators sitting in the western half of the stadium and in this scenario South Way will serve as the principal pedestrian route back to VDC-Careys. Given the high pedestrian demand that would arise with the maximum 290 coach parking scenario, a control system in which the rate of pedestrians returning to the VDC-Careys site is regulated in line with the capacity of the southern footway of South Way (between First Way and VDC-Careys) is proposed. This system will involve holding spectators in a reservoir, which could occupy up to 275 metres along South Way, along the south side of the stadium. The success of such a system will depend on effective marshalling during events to ensure that pedestrians returning to the VDC-Careys site are unable to shortcut the reservoir. TfL expects that the measures and procedures for managing pedestrian egress flows to VDC-Careys will be set out in an overarching event day management plan; in order to mitigate the potential conflict between pedestrian flows and coaches at the junction of First Way and South Way.

39 TfL is satisfied with the conclusions of the transport assessment that the proposal will not result in highway impacts of any consequence. The proposal will not result in additional vehicle trips on the highway network given that there is no change in the overall quantum of event day car and coach parking, and that vehicle will use the existing Stadium Access Corridor.

40 The application includes a Framework Construction Logistics Plan that encompasses the revised Wembley Park Master Plan and the VDC-Careys site. The CLP is considered to be generally acceptable. TfL however expects that a full CLP that incorporates the provisions for each development site according to the phasing of construction will be secured by condition and reviewed under each reserved matters application and approved by Brent Council prior to commencement of construction on site. Additionally, applicants and their contractors are encouraged to sign up to the Fleet Recognition Scheme (FORS) which promotes better safety standards during construction. The FORS guidance can be found at <http://www.tfl.gov.uk/info-for/freight/safety-and-the-environment/managing-risks-wrrr>.

Urban design

41 Chapter 7 of the London Plan sets out a series of policies about the places and spaces in which Londoners live, work and visit. Policy 7.1 sets some overarching design principles for development in London. Other relevant design policies in this chapter include specific design requirements relating to: inclusive design (Policy 7.2); designing out crime (Policy 7.3); local character (Policy 7.4); public realm (Policy 7.5); architecture (Policy 7.6).

42 It is accepted that the car parking building form is a result of the need to accommodate its function and the technical requirements to allow coach movements and pedestrian access. It is officer opinion that although the applicant's design & access statement indicates that the concrete structure will be dressed for special events, more effort should be made on

permanently dressing the facade elevation in the manner of the nearby Blue Car Park. This is because the immediate surrounding area although presently consisting of utilitarian industrial buildings has in part been subject to industrial land release meaning the nature of the immediate area will change in the future.

Access and inclusive design

43 The applicant's design & access statement establishes that the technical design of the coach park has taken account the requirements of inclusive design and the scheme includes the following features:

- All coaches need to pre-book and state whether disabled passengers are on board and will be directed to the upper level of the coach park in close proximity to the pedestrian exits to south way.
- Pedestrian access and egress to the parking will be primarily be via a pedestrian ramp.
- It has been designed to meet Part M as a minimum and the requirements of the London Plan and is designed to ensure the floors are predominantly level with the majority of gradients no steeper than 1:60.
- The floors will be firm, non-reflective and slip resistant and lighting will designed to reduce shadowing and increase positive perception and personal security.
- A 13 person capacity lift is included in the southwest corner this will be 1.1 metres by 2.1 metres exceeding Part M minimum dimensions. These dimensions will allow for a wheelchair user together with several other passengers
- Walkways with a 1.2 metre width are provided between coaches which is sufficient to allow for a wheelchair user and meets DfT Inclusive Mobility guidance.
- Safe refuge zones are provided in all fire protected stair cores which allow people with disabilities and impairments can await assistance from parking management staff who will use a two way system of communication will be used to complete evacuation.

The Mayor's CIL

44 In accordance with London Plan Policy 8.3, the Mayoral Community Infrastructure Levy (CIL) came into effect on 1st April 2012. The levy is charged at £35 per square metre of additional floor space in the Brent Council area.

45 In addition, Brent Council adopted its Community Infrastructure Levy (CIL) charging schedule in July 2013. A full charging schedule is available from the council, and should be consulted in order to determine the applicable Brent CIL charge for the proposed use.

Local planning authority's position

46 Brent Council officers are supportive of the application.

Legal considerations

47 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

48 There are no financial considerations at this stage.

Conclusion

49 London Plan policies on housing mix, affordable housing, density, children & young person's play, urban design, access, sustainable energy and transport. Whilst the principle of development is strongly supported, a number of minor issues are raised, and consequently the application does not accord with London Plan Policy. The following could address these deficiencies:

- **Principle of development:** The Wembley AAP and London Plan policy support the provision of the coach parking facility to help facilitate the delivery of the Wembley masterplan. The applicant should however continue to work with Wembley Stadium to establish a parking solution that meets the requirements of both the delivery of the masterplan and the operation of Wembley Stadium.
- **Transport:** TfL is satisfied that the VDC-Careys site proposal for the most part complies with the principles for coach parking set out in policy WEMP 17 but is concerned that coach parking in the VDC-Careys site will result in conflict between pedestrian egress flows and vehicles at the junction of First Way/ South Way. The applicant should continue discussions with TfL to resolve this issue.
- **Urban design:** It is officer opinion that although the applicant's design & access statement indicates that the concrete structure will be dressed for special events, more effort should be made on permanently dressing the facade elevation in the manner of the nearby Blue Car Park.
- **Access:** The applicant's design & access statement establishes that the technical design of the coach park has taken account the requirements of inclusive design.

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