

Wembley Park Mastepplan and Blue Multi-Storey Car Park

in the London Borough of Brent

planning application no.15/55501

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

A hybrid application consisting of the following:

- 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 together with 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).
- A full application is for the Blue 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 and associated infrastructure, landscaping and vehicular access.

The applicant

The applicant is **Quintain PLC**, the agent is **Signet Planning**, the architect for the outline application for the Wembley Masterplan is **LDA Design** and the architect for the Blue Multi-Storey Car Park is **Leslie Jones Architecture**.

Strategic issues

At stage 1 this application raises issues in relation to the **principle of development** because of the need to resolve issues in relation to Wembley Stadium's event day operation. Issues also need to be resolved in relation **housing mix, affordable housing, urban design, children & young person's play, access, sustainable energy** and **transport**.

Recommendation

That Brent Council be advised that while the application is generally acceptable in strategic planning terms but the application does not comply with the London Plan, for the reasons set out in paragraph 168 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 1A, 1B, 1C, and 3F of the Schedule to the Order 2008:

- *'1A: Development which comprises or includes the provision of more than 150 houses, flats, or flats and houses.*
- *1B: Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings: c) outside Central London and with a total floorspace of more than 15,000 square metres.*
- *1C(c). Development which comprises or includes the erection of a building... more than 30 metres high and is outside the City of London".*
- *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 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.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 has been taken into account in the consideration of this case.

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

Site description

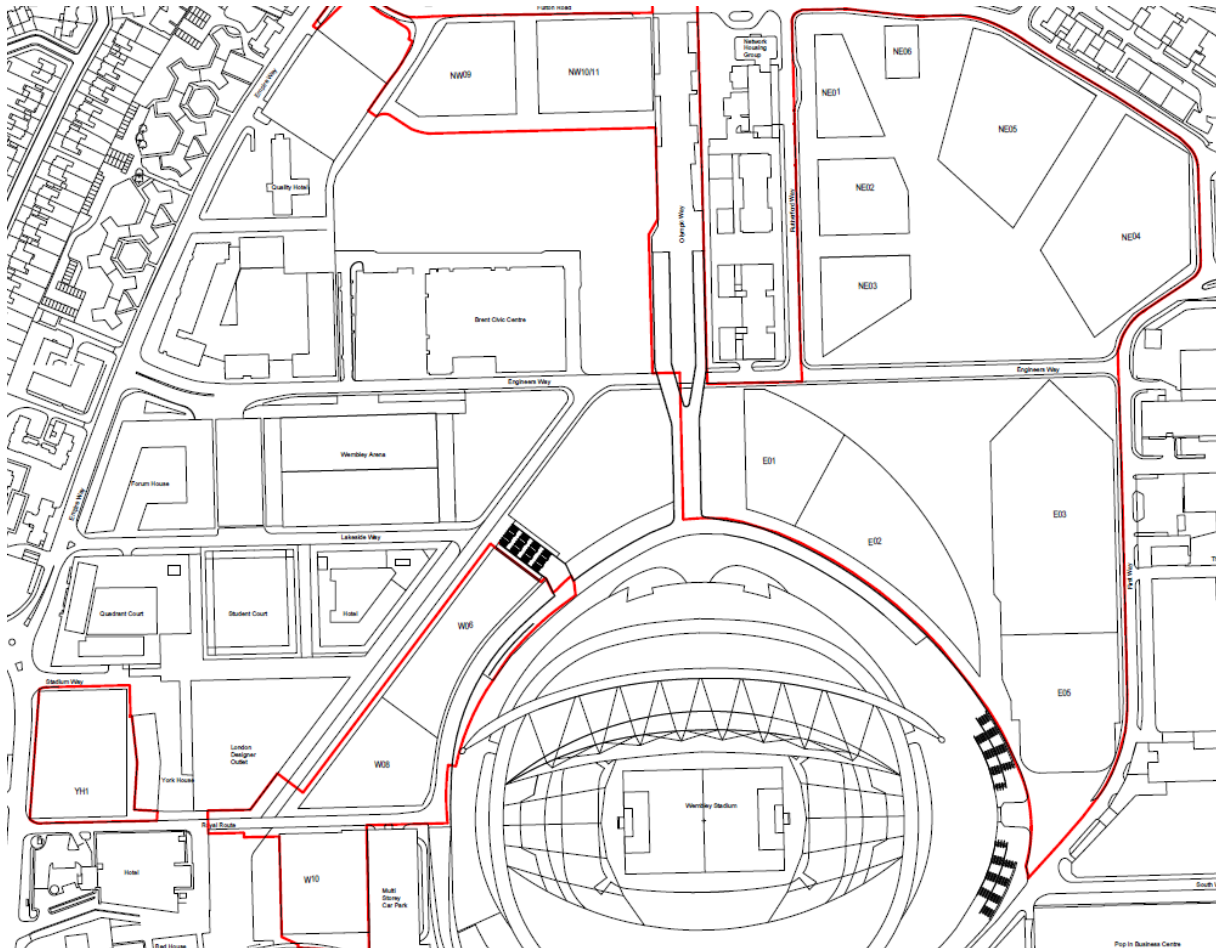
6 This site area is 15.87 ha comprising a series of plots around Wembley Stadium, split into four spatial areas. These are North West Lands, Western Lands, the Park and North Eastern Lands.

North West Lands

7 The first area is defined as the land to the south of Fulton Road, west of Olympic Way, east of Fulton and Malcolm Houses which front Empire Way, and north of Plots NW06, NW07, NW08 and Elvin Square Gardens of the North West Lands site. The land comprises plots NW09 and NW10/11 of the North West Lands (under outline planning permission 10/3032) and the proposed development sets out alternative proposals for these plots. This site is laid tarmac, having been previously being used for surface car parking, and it is currently bordered by hoardings.

Western Lands

8 The second area is defined as the surface car park adjoining York House on Empire Way and land to the east of Wembley Park Boulevard and west of Wembley Stadium. The land includes plots W06, W08 and W10 of the Stage 1 Development (outline planning permission ref: 03/3200) and the masterplan sets out alternative proposals for these plots. The surface car park to the west of York House is laid to tarmac with pedestrian access is provided from Empire Way and vehicular access from Stadium Way. Plots W06 and W08 are currently laid to grass and accommodate a children's play facility and event space, as interim uses in advance of permanent development.



The Park

9 The third area is the existing Wembley Stadium surface car park bordered by Olympic Way, First Way, Engineers Way and Wembley Stadium, known as the “Eastern Lands” or ‘Green car park’ within the Stage 1 Development (outline planning permission ref: 03/3200). The masterplan sets out alternative proposals for this area. The area is currently laid to tarmac and is used for parking of cars, and also for the parking of coaches, minibuses and/or cars on Event Days and access is provided from First Way and Engineers Way.

North Eastern Lands

10 The fourth area is defined by Engineers Way, First Way, Fulton Road and Olympic Way. It also includes Olympic Way up to the foot of the steps to Wembley Park underground station. Olympic Way comprises a pedestrian priority route between Wembley Park underground station and Wembley Stadium and it also provides a processional route on Event Days. The remainder of the site comprises Wembley Retail Park, which accommodates low-rise retail warehouse units with

some small office units, and the areas around the buildings are used for parking to serve the units on the site. The western, northern and eastern terraces of the retail park provide 20,470 sqm of retail floorspace with the office, restaurant and industrial units on the site provide circa 6,276 sq.m. of floorspace. Some of the retail units are now vacant and the demolition of the eastern terrace of retail units is nearing completion.

11 There are no listed buildings on the application sites and the nearest listed building is Wembley Arena, which is Grade II listed. This site falls within the Wembley Housing Zone.

12 The development site is located in close proximity to Wembley Stadium station, served by Chiltern Railways services between Marylebone and Gerrards Cross and Aylesbury. Wembley Park London Underground (LU) station is approximately 500 metres north of the plots and is served by LU services on the Jubilee and Metropolitan lines. Wembley Central station lies over 1km to the south-west and is served by LU services on the Bakerloo line, London Overground services, London Midlands and some Southern services.

13 The level of access to public transport varies across the site (from 2 to 6a out of 1-6 where 6b is excellent), with the northwest and southwest parts of the site recording high levels, owing to a closer proximity to stations and benefiting from good bus services (up to 6 bus routes) whilst the northeast and southeast parts of the site recording a much lower level with access limited to two (2) bus routes.

14 The highway network adjoining the site are mainly local roads, and is therefore within the jurisdiction of Brent Council. The nearest part of the Transport for London Road Network (TLRN) is the North Circular Road (A406) approximately 1.5km to the east of the site which links the site via South Way and Great Access Way. The nearest part of the Strategic Road Network (SRN) is A404 Harrow Road / Wembley High Road, 150 metres to the south.

15 The London Cycle Network (LCN) Route 45 passes to the southwest of the site along Harrow Road and High Road (A404) and runs between Harrow and Ladbroke Grove. Several of the roads that adjoin the development site offer quieter routes recommended for cyclists: South Way, Olympic Way, Brook Avenue, Chalkhill Road and Chaplin Road.

Site/Case history

16 In 2004, outline planning permission was granted for the applicant's 'Stage 1' Masterplan for circa 500,000 sq.m. of development on the 17 hectares of land immediately surrounding Wembley Stadium. The applicant has subsequently built over 500 residential units (Forum House and Quadrant Court), a hotel, a student accommodation court and London Designer Outlet, together with associated infrastructure and landscaping. It has also re-orientated and refurbished the Grade II Listed Wembley Arena entertainment venue, and provided meantime developments in advance of the full build out of the Masterplan, including a children's play area and a Power League football facility. Part of the unbuilt area of the Stage 1 masterplan is within the site of this application.

17 In 2011, outline planning permission was granted for applicant's North West Lands ("NW Lands") development to the north of Engineers Way and to the west of Olympic Way. This mixed-use development will provide up to 160,000 sq.m. of floorspace, around the new Brent Civic Centre building. The first residential plot NW01, comprising 475 residential units of mixed tenures is nearing completion and development is coming forward on the second residential plot (NW06) of 362 apartments with a new public open space known as Elvin Square Gardens.

18 Related to the proposals in these applications is the South West Lands site (“SW Lands”), to the south west of Quintain’s Stage 1 Development site, between Wembley Stadium and Wembley High Road. In December 2014, a planning application was submitted for the development and has been subject of a Stage 1 Report from the GLA (D&P/3495/01). This proposal seeks to substantially replace the existing outline permission covering this site, granted to the London Development Agency in 2004 (ref: 04/0379) (“the LDA permission”).

19 Pursuant to the Stage 1 Planning Permission, reserved matters consent has subsequently been granted for:

- Residential Plot W01, now known as Forum House, (December 2006, ref 05/2949) which has now been completed and is occupied;
- Residential Plot W04, now known as Quadrant Court, (March 2007, Ref: 06/08), which has now been completed and is occupied;
- Stadium Piazza Ref (January 2005, Ref: 04/3332), which has been implemented in part by the construction of the 'Spanish Steps';
- Mixed use hotel, student accommodation and residential accommodation within Plot W05 (August 2007, Ref: 07/1583, as subsequently amended by approval 10/1842 and 11/3327), which has been completed and is occupied;
- W03 (March 2007, Ref: 06/3631), which has not yet been implemented, but meantime development in the form of a Power League football centre temporarily occupies the plot.
- W07 (June 2008, Ref 08/0826 and November 2010, Ref: 10/2202), which forms the heart of the new LDO which has now been completed and is operational; and
- W10 car park (April 2012, Ref 12/0138) which has been completed and is operational.

20 The existing environment on the Stage 1 Development described above (i.e. the plots that have been constructed or are under construction) forms part of the baseline position established for assessment of the Proposed Development.

21 Pursuant to the North West Lands Planning Permission reserved matters consent has subsequently been granted for:

- Residential Plot NW01 (December 2013, ref: 13/2799) for the erection of 5-16 storey building comprising a mix of uses. This scheme is now under construction and will comprise 475 residential units of mixed tenures and will begin to be occupied from April 2016.
- NW06: (February 2015, ref: 14/4330) for a 1 to 20 storey building is under construction will provide 362 apartments of mixed tenures and a variety of non-residential uses.
- Elvin Square Gardens and other landscaping/infrastructure (February 2015, Ref: 14/4541). The construction is shortly to commence on delivering this scheme.

22 A reserved matters application has also recently been submitted for Plots NW07/08 and finally in March 2015, planning permission was granted for a theatre on Plots NW10/11, to the west of Olympic Way and south of Fulton Road. The proposed theatre will incorporate a restaurant, foyer, bar area, back of house facilities, and associated landscaping, bicycle parking and ancillary works. It is consented for a temporary period of 10 years.

23 A further stage 1 application is linked to the proposals is Wembley Retail Park and VDC/ Careys Site (D&P/3841), which is also referable to the Mayor. Which provides additional coach and car parking spaces relating to the main masterplan development.

24 The current application proposals have been subject to a pre-application meeting and an advice report D&P/3790/JA Pre-app was issued on 10 July 2015.

Details of the proposal

Land use

25 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.

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

27 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.

28 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.

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

30 The development proposals will be delivered across seven character areas defined as Western Lands and Royal Route, North Western Lands, The Park, North Eastern Lands, Eastern Lands, Olympic Circus, and Primary School & York House.

31 There is a linked application for the VDC/Careys Site, South Way (D&P/3841) which relates to the re-provision of coach and car directly in this hybrid application.

Masterplan character areas

32 The masterplan subdivides the development sites into seven character areas, these are Western Lands and Royal Route, North West Lands, The Park, North East Lands, Eastern Lands, Olympic Circus and Primary School options/York House.



Western Lands and Royal Route

33 The character area consists of Plots W06, W08 and W10 which were originally consented under the Stage 1 outline planning permission ref: 03/3200. The parameters and principles set out within this Wembley Park Masterplan will replace the parameters and principles for these plots established under the Stage 1 outline planning permission.

34 Plots W06 and W08 will accommodate retail and/or assembly and leisure uses at lower level with residential, hotel or business floorspace at upper floor levels. Active frontages will be provided to Wembley Park Boulevard and to the north east and south west.

35 Buildings within these plots are proposed to have a consistent height of 79 metres AOD, however, their layout and massing will differ depending upon whether the upper levels of each plot are used for residential, business or hotel use. The roofs are proposed to accommodate green and/or brown roofs and communal roof terraces and where the plots are to have residential uses at upper levels, the plots will also accommodate private communal open space and play space, as shown on the Parameter Plans. Servicing of these plots will be from Perimeter Way to the east and any parking provided will also be at ground level on the eastern side of W06.

36 It is proposed that retail uses are provided at lower levels within plot W10 overlooking Wembley Park Boulevard with B1 business and/or leisure and assembly at upper levels and the western frontage will be an active frontage. Car parking will be increased in the existing Red multi-storey car park to be provided within the plot and could come forward either at the lower levels across the plots or as a single aisle extension to the existing MSCP to the east of the plot.

North Western Lands

37 The character area consists of plots NW09 and NW10/11 which were originally defined in the North West Lands Development (permitted under outline planning permission ref: 10/3032).

38 The proposal is for both plots to provide residential, retail, business and/or non-residential institution use at lower levels with active frontages on all four sides and residential. Buildings within both plots rise to over 90 metres AOD on their north western corners to stand as markers from Empire Way and Fulton Road, and drop to 40 metres AOD at Olympic Way. It is intended that the roofs of these plots will be a mix of green and brown roofs, with some communal roof terraces and private communal residential open space will be provided at podium level in the central areas of each plot. The roofscape adjoining Olympic Way will also comprise communal residential open space.

39 Play space will be provided within the landscaped areas within each plot and each plot will be surrounded by predominantly high quality landscaped public realm and vehicular access will be from the west to parking within the parameters of each plot and below ground.

The Park

40 A new public park will be provided between plots E01 - E03 and plots EN01 – EN06 and will be predominantly soft landscaped, and contain water features, primary pedestrian/cycle routes and a play area. A new play area will be provided to replace and supplement the existing meantime LDO play area on Wembley Park Boulevard.

North Eastern Lands

41 The north eastern lands are currently occupied by Wembley Retail Park and consist of Plots NE01 – NE06. They are set along Rutherford Way and Fulton Road, around a landscaped park (see above).

42 Buildings within these plots will provide non-residential institutions, business use, local needs retail and/or residential use at lower levels, as defined on the Parameter Plans with residential above. Student accommodation could also be provided at upper levels in Plot NE01, as an alternative to residential and active frontages will be provided on all sides of each plot.

43 These plots are generally set at a level of 57 metres AOD – 60 metres AOD adjoining the landscaped park, rising to 63 metres AOD – 88 metres AOD on the perimeter edges. Plot NE05 rises beyond this to 95.5 metres AOD – 105.5 metres AOD and plot NE06 is the tallest building within the proposed development, with a maximum height of 136 metres AOD. Communal residential gardens, with play space, will be provided on each plot with the exception of plot NE06 which will not be provided with on plot play space and the roofscape is intended to be a mix of green and brown roofs and private roof terraces.

44 Residential car parking areas will be provided for each of these plots at ground level or below ground within the curtilage of the plots or across linked plots. There will not be any car parking below plots NE01 and NE06. Each of the plots will be serviced via specific servicing routes off Rutherford Way and Fulton Road.

Eastern Lands and full application (site E05)

45 The character area consists of Plots E01, E02, E03 and E05 and the proposed parameter plans and principles for these plots will together supersede the parameters and principles for this part of the sites originally established under the Stage 1 outline planning permission.

46 The plots will accommodate non-residential institutions and/or residential uses (in the case of E01 and E02) and/or business uses (in the case of E03) at lower level and all three plots will accommodate residential at upper levels.

47 Plot E02 will rise from 60 metres AOD to 79 metres AOD and plot E01 will be at 88 metres AOD. Plot E03 will rise from 52.2 metres AOD to 120.5 metres AOD. The highest point of the plot will be on the north eastern side at the gateway point into the proposed development from the east. These plots will have communal residential landscaping areas and play space on plot and the roofscape will be green/brown roofs and/or roof terraces.

48 The plots will have active frontages to the landscaped park between E01/E02 and E03. Vehicular entry will be from First Way and Perimeter Way East and residential parking will be provided on plots E01 and E02, whilst non-residential parking will be provided on E03 to serve the activities within the wider Wembley estate, including Wembley Arena and Wembley Stadium.

49 There is a full application for plot E05 within this part of the outline planning application and comprise a multi storey car and coach park to serve the residential and non-residential uses on the Wembley Estate, including Wembley Arena and Wembley Stadium on Event Days. It has a set maximum height of 77.5 metres (AOD) with a vehicular access and egress from First Way.

50 Plot E05 will accommodate 1,642 non- residential car parking spaces together with 174 residential car parking spaces above 82 coach spaces. The 174 residential parking spaces will include 10% blue badge holder spaces. In the 1,642 public parking spaces, 6% will be for blue badge holders with the potential to increase to 10% as demand is identified. The car park will have a minimum head room of 2.1 metres per floor and the floors with accessible parking have a minimum head room of 2.6 metres.

51 The south elevation of the building will have a simplified, rhythmic and minimal aesthetic, providing a contrast to the more materialistically diverse elevations on the other sides. The curve form reflects the vehicular circulation ramps, whilst also softening the geometry of the vertical blades and cores and the facade has a contrast of solids and voids. The solid precast concrete elements contrast with the voids between the vertical metal blades which allow for the natural ventilation of the car park are a visual filter to the inside and are not intended to be a screen as this would inhibit air movement. The colour of the blades is proposed to be a natural bronze colour finish, to complement to the precast element. The structural steel frame is proposed to be a dark colour so that it is tonally neutral and is therefore regressive in the visual reading of the facade.

Olympic Circus

52 The main pedestrian approach from Wembley Park station to the Stadium is along the ceremonial route of Olympic Way and as pedestrians approach near to the Stadium the Pedway starts. The applicant intends to explore options to replace the Pedway with a more functional and land use efficient solution.

York House & primary school options

53 The masterplan incorporates locations for school provision to accommodate the new residential population. Three options are identified these are Ark Academy (subject to a current application); Eastern Necklace Park School proposals which are located between Plots E02, E03 and E05, this proposal featured the Park as its main setting. Classrooms and school facilities were arranged on multiple levels with reception and arrival facilities at the ground floor accessed from Perimeter Way; and Canada Court school proposal is located in E03 in close proximity to Engineers Way and the Park, this proposal is characterised as a raised school above the coach park.

54 The York House office building is set back approximately 70 metres from Wembley Hill Road with its main entrance located at approximately 3.5 metres below street level and lost in the midst of the open car park. The open car park interrupts the strong building edge to Wembley Hill Road and undermines the urban quality of the street.

55 The Wembley Area Action Plan identifies York House within its Site Proposals W9 and recommends development on the existing large open car park site in front of York House 'in order to enhance the area'. In order for this development to come forward on the car park, the office building entrance will need to be relocated. It is proposed that the entrance is located along Royal Route via a bridge connection immediately to the south of the building

56 Plot YH1 will comprise a primary school. The maximum height of the plot will be 60.9m AOD (plus the tolerances as set out on the Parameter Plans). Existing car parking on site serving the office occupiers will be consolidated and provided over two levels beneath the school. A new entrance will be formed into the York House office building accessed from Royal Route. This parking will not be made available for the drop off or collection of children attending the school. Servicing for the school and existing York House office building will continue to be provided from the existing service yard accessed from Stadium Way.

Strategic planning issues and relevant policies and guidance

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

- | | |
|---------------------------|--|
| • Opportunity Areas | <i>London Plan</i> |
| • Mix of uses | <i>London Plan</i> |
| • Visitor Infrastructure | <i>London Plan</i> |
| • Housing | <i>London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG</i> |
| • Affordable housing | <i>London Plan; Housing SPG; Housing Strategy; draft Interim Housing SPG.</i> |
| • Retail/town centre uses | <i>London Plan; Town Centres SPG</i> |
| • Density | <i>London Plan; Housing SPG</i> |
| • Employment | <i>London Plan;</i> |
| • Tourism/leisure | <i>London Plan;</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG</i> |
| • Tall buildings/views | <i>London Plan</i> |

- Access *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Sustainable development *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*
- Air quality *London Plan; the Mayor's Air Quality Strategy;*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG*
- Parking *London Plan; the Mayor's Transport Strategy*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy; Crossrail SPG*

58 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), Wembley Area Action Plan (2014) and the London Plan (consolidated with alterations since 2011).

59 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework
- Draft Minor Alterations to the London Plan (2015)

Principle of development (masterplan)

60 The schemes propose a range of uses that include hotel, retail space, B1 office and/or leisure, with approximately 4,000 residential units. The principle of development of both outline and full applications is measured against the guidance relating to London Plan policy for the Wembley Opportunity Area and the Wembley Area Action Plan (January 2015).

Extant consents

61 There are two extant consents that establish the principle of development these are the 2004 outline planning permission for the applicant's Stage 1' Masterplan for circa 500,000 sq.m. of development on the 17 hectares of land immediately surrounding Wembley Stadium and the 2011, outline planning permission was granted for applicant's North West Lands for 160,000 sq.m. of development. As set out above the masterplan area has a complicated site history as the overall application relates to multiple sites across the two planning permissions some of which have been partially delivered, subject to temporary time defined planning permission, or are being revised by this application. The existing consents are therefore of material weight in considering the masterplan application.

62 The main application is for a maximum of 420,000 sq.m. GEA. This quantum of development is below the total floorspace figure of the existing consents and analysis of use mix of the development floorspace shows some variation in floorspace use between the extant consents and the masterplan, but these are not sufficient to raise any concern – notwithstanding the transport section of this report does raise some issues in this regard.

Wembley Opportunity Area

63 The sites are located within the Wembley Opportunity Area where development is guided by London Plan policy 2.13 (opportunity areas and intensification areas) and as set out in Table A1.1 Opportunity Areas. An indicative employment capacity for 11,000 jobs and a minimum 11,500 new homes is set out. The development rationale is defined as the following:

“New housing and leisure-related development should be integrated with the iconic and world-class stadium and other facilities, including the Arena and Conference Centre. Supported by upgrades to the three stations, improved public transport will play a key role in managing heavy demand for mass movement, links between the stations and the strategic leisure facilities should be improved. Development should contribute to the regeneration, vitality and viability of Wembley as a town centre, including its expansion eastwards. Proposals should enhance permeability and connectivity to the wider hinterland and the potential to locate a civic facility including a school adjacent to Olympic Way should be explored.”

64 London plan policy 2.13 states: *“Development proposals within opportunity areas and intensification areas should:*

- a support the strategic policy directions for the opportunity areas and intensification areas set out in Annex 1, and where relevant, in adopted opportunity area planning frameworks*
- b seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses*
- c contribute towards meeting (or where appropriate, exceeding) the minimum guidelines for housing and/or indicative estimates for employment capacity set out in Annex 1, tested as appropriate through opportunity area planning frameworks and/or local development frameworks*
- d realize scope for intensification associated with existing or proposed improvements in public transport accessibility, such as Crossrail, making better use of existing infrastructure and promote inclusive access including cycling and walking*
- e support wider regeneration (including in particular improvements to environmental quality) and integrate development proposals to the surrounding areas especially areas for regeneration”*

65 A separate Opportunity Area Planning Framework has not been prepared for Wembley in this instance the AAP is seen as providing this guidance. The land use strategy set out in the London Plan for Wembley identifies a range of uses including housing, leisure and job-creating floor space. The scheme as proposed is in accordance with the aspirations for the London Plan in relation to the Wembley Opportunity Area.

Wembley AAP

66 The Brent Council Wembley Area Action Plan sets out the strategy for growth and regeneration for Wembley over the next 15 years. The plan 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.

67 The application sites are located in the sub area identified in the AAP as the Stadium Comprehensive Development Area (SCDA) much of the area is designated as a strategic cultural area where leisure, tourism and cultural uses are encouraged. Olympic Way is defined as the main

organising structure, which to the west will be a new shopping street with the new Civic Centre and the east is seen to evolve a strong residential character focused around a newly created park.

68 The development proposals occupy sites located in:

Wembley AAP Policy	Land use
W8 Land West of Wembley Stadium.	Mix of uses including retail, leisure, office, community and residential. Capacity for 1,500 residential units.
W9 York House.	Explore opportunities for York House Car Park
W12 North West Lands.	Mix of uses including retail, leisure, office, community and residential. Capacity for 1,300 residential units.
W18 Wembley Retail Park,	Location of a new residential district and should include new public space and new primary school. Capacity for 1,300 residential units.
W19 Wembley Stadium Car Park.	Mixed use development including residential including major leisure attraction. Any proposals would need to include replacement coach and car park. Capacity for 1,500 residential units.

69 There are some differences between the site specific guidance and that proposed by the masterplan but the land use proposals are not significant and are in keeping with the objectives and development principles of Wembley AAP.

Wembley Stadium

70 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-provision 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.

71 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.

72 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 viable parking solution that meets the requirements of both the delivery of the masterplan and the operation of Wembley Stadium.

Conclusion

73 The applicant's planning statement sets out the existing, approved and proposed uses and analysis of the land use proposal indicate that the quantum of floorspace is broadly consistent with that of the two major consents. The quantum of floorspace and land uses proposed is substantial but the optimisation of residential and non-residential output and densities is expected in Opportunity Areas and the overall floorspace and land use mix is supported. This support is however dependant on ensuring issues relating to maintain the coach and car parking requirement of Wembley Stadium operation and further assurance is required in relation to this issue.

Principle of development (Blue Multi-Storey Car Park)

74 The full application is for the part of the re-provision of Wembley Stadium surface car parking. 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 Blue Multi-storey Car Park detailed application forms part of the 2015 Masterplan Event Parking Strategy, which cumulatively with the proposed VDC Careys application coach park (D&P/3841) will meet the legal obligation requirements.

75 The principle of the car park proposal is supported as this will deliver a key element in the delivery of the masterplan as it enables the removal of large areas of surface car parking. Notwithstanding this there is some confusion over how the car parking meets the operation needs of Wembley Stadium during the development phases of the masterplan and the effectiveness of the proposed design solution on efficiently coping with Wembley Stadium events. Furthermore, the full application is for approximately half of the coach/car park and not the full facility and it is important the applicant explain why the full car park is not being dealt with in the application - together with the separate VDC/ Careys site application. These issues are set out in detail in TfL transport comments below and need to be fully addressed.

76 The applicant should resolve these issues before stage 2 referral as in its current form this aspect of the applicant is not supported and is contrary to the London Plan.

Housing

77 London Plan Policy 3.3 confirms the pressing need for more homes in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford. Part B of this policy states that the Mayor will seek to ensure that the housing need identified in paragraphs 3.17 and 3.18 of the London Plan is met, particularly through provision consistent with at least an annual average of 42,000 net additional homes across London. London Plan Table 3.1 sets a target for Brent Council to deliver a minimum of 1,525 new residential units a year until 2025. The proposals are for circa 4,000 units which is equivalent of over 2.6 years supply.

78 Furthermore, London Plan policy 3.8 encourages a full range of housing choice. This is supported by the Housing SPG, which seeks to secure family accommodation within residential schemes, particularly within the social and affordable rented sector, and sets strategic guidance for councils in assessing their local needs. Policy 3.11 of the London Plan states that within affordable housing provision, priority should be accorded to family housing.

79 Brent Council's affordable housing requirement set by its Core Strategy is for 50% as a starting point for negotiations in all developments. The AAP adopts the London Plan policy 3.12

requirement of securing the maximum reasonable amount rather than an absolute figure. The AAP indicates the quantum of affordable housing is negotiable given the regeneration aims of the Wembley AAP, if supported by a viability assessment.

80 The applicant's planning statement provides very limited information on housing mix and affordable provision and GLA officers have relied on information in its housing viability assessment to understand the housing offer. There are issues however with the information provided because viability assessment establishes an indicative scheme based on Brent Council preferred housing mix, but this mix is not provided in relation to unit type/size and furthermore there is slight anomaly in the affordable housing offer set out in the report conclusion from that stated in the main body of the report.

81 The applicant's affordable housing viability assessment concludes that the maximum affordable offer for the indicative scheme (based on 3,949 residential units) to have the potential of being viable is 15% of the residential floorspace in each plot (in line with the Brent Council requested mix). This equates to 572 affordable housing units and comprising 169 intermediate, 101 affordable rented residential homes, 151 discounted market sales units and 151 flexi-rent units. It has furthermore also raised the issue that Plot E03B has the potential to be delivered entirely as time-defined intermediate product as part of the London Housing Bank programme. This would result in circa 12% of the entire residential quantum to coming forwards immediately without impacting negatively on the affordable components of the other residential plots. Although this relates to the need to resolve provision of coach and car parking for Wembley on which the residential development is proposed.

82 The applicant states that it is exploring with Brent Council several mechanisms which can potentially provide an enhanced affordable housing provision. The quantum of affordable that could be delivered has the potential to be increased via a reduction in the number of 3 bedroom units, an alteration to the ratio of affordable rented to intermediate units and partial CIL relief.

83 It is welcome the applicant is exploring affordable housing review mechanism options with Brent Council. This is in line with Policy 3.12 and guidance in the Housing SPG, large multi-phased scheme such as this should be subject to periodic review mechanisms. This mechanism would secure reassessments of scheme viability prior to each phase of development to more closely reflect likely costs and values at that future time, hence achieving the maximum reasonable amount of affordable housing at that time. GLA officers require details of the adopted affordable housing review mechanism before stage 2 referral.

Conclusion

84 Although the principle of the masterplan delivering circa 4,000 residential units is strongly supported it is not possible to assess the scheme against London Plan Policy 3.11 to 3.12 (affordable housing), or Policy 3.8 (Choice) unless further detail is provided on unit type/size/tenure mix and the affordable housing offer and the related review mechanism are confirmed. This aspect of the application is not compliant with the London Plan policy as insufficient information and detail has been provided for the outline application, this is because the phased development will require approval through reserved matters and the Mayor does not have statutory powers to review reserved matters applications.

Density

85 London Plan policy 3.4 requires development to optimise housing output for different locations taking into account local context and character, the design principles in Chapter 7 and public transport capacity. Table 3.2 provides density guidelines in support of this and should be

read alongside the opportunity area policies, which expect high density development in such locations.

86 The masterplan site covers a central setting but has a number of plots with a varying PTAL level of between 3 and 5 depending on location. London Plan Table 3 suggests densities of between 350 to 1,100 habitable rooms per hectare. The proposed development density across the development plots is 500--520 units/hectare or 1,300 -1,400 habitable rooms/hectare, this sits in the mid-range of development density and given the location within identified OAPF area this density is supported given that OAPF policy encourages a higher density of development. This support however is dependent on securing improvements to public transport to enhance PTAL accessibility.

Retail

87 The masterplan proposes the removal of existing retail use from the North East lands site (W18 Wembley Retail Park) and relocation of retail floorspace to Wembley Park Boulevard. The masterplan will potentially deliver approximately 21,000 sq.m. (gross) of A1-A4 Retail. This shift in retail gravity and quantum of retail floorspace is supported by the Wembley AAP, as it will focus retail development on The Boulevard which will form part a retail street linking to Wembley Town Centre and fits with the ambition of the AAP retail policy. The Mayor approved the Wembley AAP with an agreement that a contiguous boundary would be created between Wembley (Major centre) and Wembley Park (District centre) town centres.

88 Brent Council has amended local policy to extend the town centre boundary to Fulton Road abutting the District Centre. Furthermore Brent's Retail Needs Capacity Study 2008 identified a requirement of 27,000 sq.m. of comparison floorspace up to 2026 to be located in Brent's two major centres with a further need for 12,500 sq.m. off convenience floorspace up to 2026 . However there is an identified lack of available sites in Kilburn and Brent Council's Core Strategy identifies Wembley as the main location for this growth. The principle of locating retail floorspace in the masterplan is supported by local plan policy and does not raise any concerns in relation to having significant adverse impact to the London Plan hierarchy of retail centres. This is because the masterplan will result in the removal of a substantial quantum of existing floorspace at Wembley Retail Park and the expansion of the retail area along The Boulevard is supported by the AAP strategic policy.

Office/ employment

89 The masterplan land use mix includes 82,000 sq.m. (gross) of B1 commercial floorspace across the development sites. This quantum of B1 office floorspace is supported by AAP policy WEM 9, whilst the London Plan in Table A1.1 Opportunity Areas establishes an indicative employment capacity for 11,000 jobs and a minimum for the Wembley OAPF area.

Urban design (Masterplan)

90 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); tall and large scale buildings (Policy 7.7); heritage assets (Policy 7.8); heritage-led regeneration (Policy 7.9); and strategic views (policies 7.11 and 7.12).

91 The overall approach to the masterplan is supported notwithstanding this the applicant needs to address transport issues raised in relation to bus penetration, bus stop provision and the re-provision of agreed coach and car parking for Wembley Stadium to ensure that an integrated piece of city results from its implementation.

Layout

Eastern Lands

92 The removal of large areas of surface parking around Wembley Stadium (Eastern Lands) and its rationalisation into multi-story car parking (and the VDC/Careys site) in the north east masterplan is supported as this allows for the southern part of parkland to be developed. The coach/ car park is located to the east of the Stadium (full application for site E05) and extends under a second block (E03) which has business space and lobbies (to podium level residential blocks) that wrap around the edge of coach/car park facing the park - this is an excellent design solution that eliminates potential dead frontages to the The Park and First Way. Furthermore a finger form residential edge with podium based amenity in-between the blocks is created on the edge of the stadium concourse, this again defines the edge of park, although the applicant should note comments in relation to massing (below). Notwithstanding this support the applicant will need to resolve the issues relating to the re-providing of coach and car parking for Wembley Stadium which is fundamental to the delivery of the masterplan.

North East Lands

93 The adoption of U-shaped blocks to the east of the park (North Eastern Lands) with podium form blocks to the west with routes in between is supported as this allows for a highly permeable layout of streets and pedestrian routes. Since the pre-application stage the applicant has endeavoured to limit areas of dead frontage on the western podium blocks at ground floor and this is welcome.

The Park

94 The design allows for The Park area to extend around the lake with green spaces on the podium blocks stepping down to the water edge, this will give the development a strong landscape form. The pedestrian routes around the park are on the western side of the lake area with limited access and no continuous footpath on the eastern edge. As stated as the pre-application stage it remains officer opinion that the applicant should slightly set back the building line of the U-shaped blocks from the water edge to allow for pedestrian access along the eastern edge and this principle should be secured by parameter block alignment. This is because it would ensure that the greenspace is physically accessible and maximise pedestrian permeability. In relation to the detailed design of the parkland and lake it is important that wider environment benefits are achieved so that they will have a practical as well as aesthetic benefit to be built into the delivery of this amenity space (see surface water flooding section).

Western Lands and Royale Route

95 The definition of the eastern edge of The Boulevard (Western Lands and Royale Route) with ground floor retail units is supported as this makes logical sense in creating a defined shopping street where the western side is already defined by the London Outlet centre and related development. It is also welcome that the applicant has looked to redefine the section of The Boulevard as it passes under Royal Route by lowering the ground level to increase the clearance height and evolve a strategy to activate the public realm. In relation to Royal route itself the applicant has thought about the current poor gateway entrance created by York House by

addressing the building entrance orientation and utilisation of the adjacent car park as a potential school site and this is welcome.

96 An omission from the masterplan layout plans is one that establishes potential locations for bus stops and taxi ranks to ensure required bus penetration is achieved and potential stop locations identified (see transport section). The applicant should address this in the layout plans and identify broad location in its parameter plans.

North West Lands

97 The North West Lands blocks have a frontage to Olympic Way, where there are temporary proposals for the Imagination Theatre. After the theatre removal, the applicant is proposing that the site is sub-divided to allow for podium based perimeter form development, with a retail draw building on the frontage to Olympic Way. This approach increases permeability through the large urban block and is linked to the future development of the existing retail park to the north.

Primary schools

98 The applicant has identified potential locations for primary schools which are different from that proposed by the Wembley AAP - this is accepted as the AAP school location is where the parkland is proposed. The applicant has identified three potential locations for primary school buildings these are on the corner of Empire Way/ Royal Route on York House Car Park; Eastern Necklace Park School located in the corner of the Eastern Lands Park between blocks E02, E03 and E05. Whilst it is welcome these locations have been identified in the masterplan further assurance is required and further options should be considered.

Conclusion

99 The overall layout principle of structuring the masterplan around a new organic form public park, retaining and building on the exiting street structure and defining the western edge of the Boulevard with ground floor retail use led development to create a strong high street form is strongly supported.

Height & Massing

100 The massing approach is based on the height of building rising to the north and to the south of the stadium, whilst dropping in height to the proposed park. This overall strategic approach is supported, as it reflects the completed tall buildings to the north and the raised mass of the stadium. It also maintains most local established views of Wembley Stadium arch by locating the tallest buildings away from the arch. The maximum height of 34 storeys is acceptable as it provides a marker building. The outline plans demonstrate that a slim elegant building can be evolved from the floorplate.

101 The adoption of finger form massing of tall elements around the eastern stadium edge and on the U-shaped block to maintain views of the stadium is supported, but some consideration should be given to modulate the maximum height to reveal more of the stadium as it is at risk of being overwhelmed by the mass of surrounding development.

102 The adoption of podium form development typology across the masterplan urban blocks is supported as this allows for clearly defined private amenity space and door-step play areas (subject to resolving areas of blank ground floor facade).

103 As requested at the pre-application stage the massing approach to eastern edge of The Boulevard has been adjusted so that the massing maintains visual links to stadium rather than a

wall of buildings enclosing it, this is welcome because one of the qualities of the existing arrangement is the sense of openness and connectivity to the stadium.

Wembley Stadium view management/ Conservation Area

104 The Wembley AAP establishes a local viewing framework which primarily protects views of Wembley Stadium and especially the stadium arch. The applicant has completed a comprehensive views assessment and although there are some views (view 4, 5, 9, 13, 14) where the Wembley Arch is filled in part by new buildings, these are not strategically significant locations and the nature of the impact on the view is not substantial given some of the buildings in the cumulative views are either existing or consented buildings.

105 The applicant has also completed a views analysis of the impact of the masterplan on proposals on St Andrew's Conservation Area, these show that the development has no impact because it cannot be seen in any views.

Securing design quality

Residential quality

106 The outline masterplan sets out broad layouts for each of the development parcels with the access and the floorplan arrangements for all development blocks. These show eight units per floor from a single core can be achieved across the entire development; that entrances can be located either to street or public space across the whole development and shared amenity space can be achieved through podium level and shared courtyards. This is based on accommodating London Plan space standard compliant units.

Parameter plans & development specification

107 As requested at the pre-application stage the applicant has provided a range of parameter plans and a development specification that secure the masterplan layout, development features, residential quality and compliance with London Plan and Housing SPG guidance. The parameter plans are as follows:

- Parameter Plan 1: Site boundary.
- Parameter Plan 2: Extent of reserved matters.
- Parameter Plan 3: Existing ground levels.
- Parameter Plan 4: Proposed ground and podium levels.
- Parameter Plan 5: Proposed maximum plot extent.
- Parameter Plan 6: Proposed extent of parking and servicing areas ground and above ground levels.
- Parameter Plan 7: Access & circulation plan.
- Parameter Plan 8: Proposed uses.
- Parameter Plan 9: Proposed heights
- Parameter Plan 10: Proposed critical dimensions
- Parameter Plan 11: Proposed public realm and open space at ground level
- Parameter Plan 12: Proposed open spaces at upper levels
- Parameter Plan 13: Tree removal plan

108 The parameter plans provide sufficient detail to secure the layout as presented in the masterplan and the overall development quality of potential development within these parameters

has been demonstrated in the individual character area plans which set out site options that can be achieved.

109 There are however some additional guidance that GLA officers require to be added to the development specification:

- There is a specific requirement to include some guidance on the range of predominant materials/finish to be used across the development on facades and roof treatments. The buildings in the illustrative plans designs look very bland and lack richness that would be expected in a new city neighbourhood.
- Paragraph 4.23 should include specific guidance that no studio units should be single aspect and north facing. Also include text that single aspect flats will need to demonstrate that all habitable rooms are provided with adequate ventilation, privacy and daylight and the orientation enhances amenity including views.
- Principles of residential design should include an additional paragraph that establish that the residential blocks should aim to achieve maximum number of 8 units per floor from a single access core unless exceptional design reasons is demonstrated.
- Principles of residential design should include an additional paragraph that secures a minimum finished floor level and finished ceiling heights of 2.5 metres in residential units.

110 The finalised parameter plans and development specification should both be secured by condition in the planning permission Heads of Terms.

Urban design (Blue Multi-Storey Car Park)

111 The multi-storey car park abuts Plot E03 and has the role within the masterplan of accommodating with Plot E03 to accommodate a proportion of the existing surface car parking. The full application proposal will accommodate approximately half of the coach parking with the remainder delivered at a later stage. As already stated in relation to the masterplan the re-provision of parking spaces in the multi-storey car park is supported as this helps to deliver key aspects of the masterplan.

112 The full application is for the first half car parking building and the physical layout and form is a result of the need to accommodate its function and the technical requirements to allow coach/car movements and pedestrian access. The building height is up to the roof edge of Wembley Stadium and a circular access ramp provides a prominent feature to the south. The building mass and height is suitable as it does not dominate the stadium structure and the layout ensures pedestrian access cores to the street and make them prominent features on the elevation.

113 The concrete structure will be dressed with vertical coloured metal fins reflecting the elevation approach of the nearby Blue Car Park, contributing to the building as a strong feature on the streetscape and this is welcomed.

Access and inclusive design

114 As the masterplan is outline application the applicant design and access statement sets out a broad strategy to ensure inclusive design principles are incorporated in to the development these are further secured in the development principles document. The applicant has included guidance that:

- 10% of all units provided across all tenures will be wheelchair accessible or adaptable to wheelchairs. Adaptable units will be located in plots where on plot car parking is provided.
- 10% of parking spaces will be Blue badge and will be within 50 metres of residential cores and an active management regime will be adopted.
- All residential units will be designated to be Lifetime Homes.
- Level access to residents gardens will be provided.
- 5% of the student accommodation (cluster flats and studios) will be provided as fully wheelchair accessible with a further 5% designed as adaptable for wheelchair occupation.
- 10% of hotel bedrooms will be wheelchair accessible.

Public realm & landscaping

115 In accordance with London Plan policy 7.2, the applicant should demonstrate that the principles of inclusive design have been incorporated throughout the scheme. The design of the landscaping and the public realm. The design and access statement sets out a number of broad principles for the public realm and parameter plan 3 plots the level changes across the site. The Park has been designed to ensure gradients are no steeper than 1:21 and parameter plan 4 demonstrates that provision is made for wheelchair uses to access from the terraces.

116 The outline design principles also include the use of tactile surfaces around the lake edge in the park and that street furniture (bollards, seating and signage) will be provided in a manner that ensures resting places are provided every 50 metres which have seating with back and arm rests. These features are all incorporated in the Development Specification.

117 As the masterplan is an outline application the applicant must demonstrate that the masterplan has inclusive design imbedded at the outset and this has been achieved. This aspect of application is compliant with the London Plan.

Children & young person's play

118 Children and young people need free, inclusive and accessible spaces offering high-quality play and informal recreation opportunities in child-friendly neighbourhood environments. Policy 3.6 of the London Plan seeks to ensure that all children and young people have access to such provision. The challenge facing boroughs and their partners in play provision will be to find opportunities to retain and increase the provision of play and informal recreation, particularly in housing developments.

119 A key benefit of the outline masterplan is the provision of a large new park which runs north to south in the eastern park of masterplan and will provide future residents with convenient access to high quality and varied green spaces. It is understood that both formal and informal play provision will be accommodated throughout the masterplan site in the form of new public spaces and courtyard gardens associated with the new residential buildings.

120 The applicant has set out in its Development Specification that doorstep playspace (0-5 age group and playspaces for 4-11 age groups will be provided in communal residential plots and within the Park and these are secured in Parameter Plan 11. A multi-use games area will also be provided for 11 age group within the Park and Olympic Circus. Whilst this is welcome the applicant should sets out the expected child yields, resultant play space requirements based on the Shaping Neighbourhoods: Play and Informal Recreation SPG 2012 and indicate the types of playable features that will be provided.

Energy strategy

121 The applicant has broadly followed the energy hierarchy and sufficient information has been provided to understand the proposals as a whole. Further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified.

122 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting.

123 The scheme is at outline stage and as such no detailed design of the buildings has taken place. The applicant has, however, provided an example overheating strategy for a similar block similar to those proposed, this is welcomed. Passive design measures include solar control glazing. It is recommended that dynamic overheating modelling is undertaken to assess the risk of overheating for each reserved matters application.

124 The applicant has modelled three development scenarios and reported the respective carbon emission figures. For the purposes of presenting emission figures the optimum scenario has been reported in this report. The development is estimated to achieve a reduction of 232 tonnes per annum (4%) in regulated carbon dioxide emissions compared to a 2013 Building Regulations compliant development.

125 The site is located within the Wembley District Heating Opportunity Area and the applicant has stated that Brent Council has been contacted regarding future inter-connection with a wider Wembley heat network, this is welcomed. However, the evidence of correspondence referenced in the energy report does not appear to be included within the document. Given that the scale and key location of the development represents a significant opportunity to develop the opportunity area the applicant is encouraged to investigate the feasibility of including additional space within the energy centre and capacity within the site heat network to supply heat to nearby developments, including existing buildings, has been investigated. Any provisions for future expansion, for example space provision in the energy centre and safe guarded pipe routes to the site boundary, should be provided. Evidence of correspondence with Brent Council should also be provided.

126 The applicant is proposing to install a site wide heat network served by an energy centre located in plot E06. In addition, the applicant is developing a separate scheme in the North West corner of the Wembley Masterplan which includes consented energy centre (known as plot NW06). The energy centre is already under construction and the applicant has stated that there is not sufficient capacity to serve the whole of the proposed Wembley Masterplan. However, due to the proximity, plots NW09 and NW10/11 will be connected to the consented energy centre within plot NW06. The applicant should confirm that the consented energy centre within Plot NW06 will connect to the Wembley Masterplan site wide heat network. Timescales for connection should be provided.

127 In addition, due to the proposed phasing dates and proximity from the proposed energy centre plots NE10 and W10 will not connect to the heat network until the later phases and will be provided with temporary gas boilers in the interim period, this is accepted in this instance. The applicant should provide timescales for when it is anticipated that Plots NE10 and W10 will be connected to the Wembley Masterplan site wide heat network.

128 Depending on the final development scenario the applicant is proposing to install a 1700-2015kW gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating (75% of the total heat demand).

129 A reduction in regulated carbon dioxide emissions of 1,708 tonnes per annum (32%) will be achieved through this second part of the energy hierarchy. It was noted in the SAP worksheets provided that the distribution losses have been entered as 5% whilst in the energy statement they have been stated as 10%. The applicant should clarify how the distribution loss of 10% has been estimated and what it includes (i.e. above ground losses, below ground losses or both) and how it relates to the SAP assumption of 5% as the distribution losses on this scale will have a significant impact on the carbon emission savings. The carbon emission figures should be update where necessary.

130 A range of renewable energy technologies has been investigated. The applicant has identified PV as appropriate, however as the emission target is met through CHP no PV is proposed. As the emission figures are based on benchmarks and representative modelling it is possible that PV could be required once the detailed modelling has been carried out at the reserved matters stages. The applicant should therefore investigate the potential for PV early during detailed design to ensure that the predicted carbon emission reduction can be maintained at the reserved matters stages, or additionally to ensure the scheme can meet future, more stringent planning or regulatory targets if required.

131 Based on the energy assessment submitted at stage I the energy strategy results in a reduction of 1,940 tonnes of carbon dioxide per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 36%. The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan. However, the comments above should be addressed before compliance with London Plan energy policy can be verified.

Flood risk & drainage

Flood risk

132 A Flood Risk Assessment (FRA) has been undertaken and confirms that virtually all of the site is within Flood Zone 1, with some small areas in Flood Zone 2. The FRA also confirms that there are areas at risk of surface water flooding of up to 0.5 metre depth, and that much of the area is in the risk area for reservoir flooding up to 2 metre depth, in the event of a breach of the Brent Reservoir (aka Welsh Harp), although this is acknowledged as a very low likelihood.

133 The FRA states that localised flood risks will be addressed at detailed design stage, through measures such as ground floor threshold levels, positioning of low points, maintenance of SUDS and overland flow routes, although a drawing showing the locations of main ponds, and sub surface attenuation tanks has been supplied.

134 Given that this is a Masterplan it is appropriate to apply a suitable planning condition requiring detailed designs of each plot to consider the residual surface and reservoir flooding risks.

Drainage

135 As noted above there are some areas of the site that are shown to be at risk of surface water flooding. There are wider surface water/fluviat risks within the Wealdstone brook and River

Brent catchment. Redevelopment at this scale offers the clearest opportunity to design in sustainable drainage measures to manage and mitigate flood risks both on site and in the wider downstream catchment. Therefore it is important that this development fully complies with London Plan Policy 5:13 (Sustainable Drainage).

136 The FRA contains a surface water drainage strategy. This states that the development will achieve the following: Greenfield run-off rates in for the North West Land (approx. 2.3ha) using underground tanks and 3x Greenfield run off rates for North East Land and Eastern Lands (approx. 10.1ha) using above ground techniques

137 The remaining Western Lands (approx 3.1ha) are already being developed under an existing permission and are limited to a 1 in 1 year peak discharge. This will be achieved by each building plot providing green roofs and attenuation tanks and external public realm areas incorporating filter drains, permeable paving, ponds and underground tanks.

138 This approach is welcomed and in principle is compliant with London Plan Policy 5:13. Given that all of the detail is to be left to individual plot development, a suitable condition should be applied to any planning permission, requiring the details of the drainage of each plot to be in line with this strategic Drainage Strategy and agreed by Brent Council Lead Local Flood Authority.

Air quality

139 In terms of air quality, new major developments are required to meet the standards in the “Sustainable Design and Construction” Supplementary Planning Guidance (SPG), and “The Control of Dust and Emissions during Construction and Demolition” SPG. The applicant has included as a minimum:

- meeting the Air Quality Neutral benchmarks for transport;
- meeting the Air Quality Neutral benchmarks for buildings;
- ensuring CHP and biomass plant meet the appropriate standards given in the Sustainable Design and Construction SPG;
- meeting The Control of Dust and Emissions during Construction and Demolition SPG’s ULEZ standards for non-road mobile machinery (NRMM) during construction; and
- during construction, developers and contractors should follow the guidance set out in The Control of Dust and Emissions during Construction and Demolition SPG: carry out an Air Quality and Dust Risk Assessment, submit an Air Quality and Dust Management Plan for the construction, implement mitigation measures and carry out site monitoring.

140 The development of this masterplan presents the opportunity to incorporate measures and structures that will design out local air quality problems at the consultation stage. The applicant is encouraged to adopt the highest standards, for instance making the development a Low Emissions Neighbourhood (LEN), establishing ultra-low emission delivery within the development, allowing for the provision of rapid charging points for electric vehicles and planning Very Important Pedestrian Days or similar to be in place from first occupation.

Transport

Access & Parking

141 Vehicular access to development plots within the Western Lands will be afforded via Royal Route and a re-aligned Perimeter Way (west). The primary vehicular access to development plots on the North West Lands (NWL) is via Fulton Road. A new shared-surface

access between Plots NW09 and NW10 is proposed to afford access and egress for a small quantum of parking (c.15-20 spaces) on Plot NW10. The development plots on the North East Lands (NE01, NE02, NE03, NE04 and NE05) will be accessed from Fulton Road and Rutherford Way respectively.

142 The proposal involves alterations to event day car and coach parking for the Wembley National Stadium. These alterations consist of a reduction in the footprint of the existing Green Parking Zone to facilitate the erection of a new multi-storey car park (Blue MSCP) which accommodates up to 1,642 car parking spaces. Coach parking will be retained in the Green Parking Zone. The proposal results in a significant reduction in the coach parking capacity of the Green Parking Zone. The full application seeks consent for 82 coach parking spaces, although in the end state a maximum of 168 coach parking spaces will be accommodated on the Green Parking Zone. TfL seeks clarification on the actual number of coach parking spaces that will be accommodated in the Green Parking Zone and an explanation as to why the full application is for 82 coaches rather than the 168 planned for in the end state.

143 It should be noted that the GLA is in receipt of a separate application (Ref: 3841): comprising of up to 290 coach parking spaces on the VDC/ Careys site. TfL provides a separate Stage 1 response to the VDC/ Careys application. However, it should be understood that that the Wembley Park masterplan application (Ref: 3665) and the VDC/Careys application (Ref: 3841) are inextricably linked with respect to coach parking for Wembley Stadium and individually would be incapable of meeting the applicant's legal obligation to provide a maximum of 458 coach parking spaces for Wembley Stadium.

144 Access and egress for the Blue MSCP and the coach parking in the Green Parking Zone will be via the modified 'Gate 5 configuration, which is located at the junction of South Way and First Way. The proposed highway improvements at First Way/ South Way junction will include a reduction in the area of the existing traffic island to improve turning (demonstrated by swept path diagrams) into the stadium and the Blue MSCP and Green Parking Zone. Approval of the detailed design of the highway improvement works for First Way/ South Way junction is primarily the responsibility of Brent Council as the highway authority and would need to be secured by the appropriate legal agreements.

145 With the exception of the Blue MSCP and part of the coach parking in the Green Parking Zone, the location, design and layout of car parking will be detailed under the reserved matters applications for the various plots as these come forward. The Transport Assessment (TA) contains a set of principles for residential car parking which are as follows: a maximum permissible car parking of 0.4 spaces per dwelling; parking for blue badge holders of 1 per wheelchair accessible unit; electric vehicle charging points to be compliant with London Plan requirements; provision for car club bays (8 -10 spaces); and removal of future residents eligibility to obtain permits to park in the neighbouring controlled parking zone (CPZ). The applicant is committed to funding the extension of the existing CPZ as agreed under the Stage 1 (2004) consent. TfL supports those subject to the applicant being legally bound to these principles by the appropriate legal agreements.

146 The principles governing non-residential car parking include: no car parking spaces allocated for student accommodation and for staff and visitors of the commercial uses and the school. Students will be able to use the non-residential parking through a booking system, to facilitate moving in/ out during term time. Vehicle drop-off associated with the school can be facilitated in the multi-storey car park which operates a tariff-free grace period. Some drop-off/ pick-up will take place on Royal Way. Disabled parking for non-residential uses will be provided within two multi-storey car parks (Red and Blue MSCP). Similarly, TfL is generally supportive of

those but will offer further comments when the details are provided as part of the reserved matters applications.

Pedestrian & Cycling

147 As the application is for outline consent, the details of cycle parking such as design and location of cycle parking will be determined as part of the reserved matters application process. The principles of cycle parking contained in the TA are also supported. Cycle parking for residential use and non-residential use will conform to the current London Plan standards in terms of quantity and form. Additionally, complementary facilities for staff cycling to work will be provided.

148 In regards to cycle infrastructure, the TA states that some elements of the cycle strategy for the Wembley Area has been provided and funded by the applicant under the Stage 1 and NWL consents. TfL expects the outstanding elements of the cycle parking strategy secured by the Section 106 agreement for the Stage 1 masterplan to be delivered by the proposal.

149 A Pedestrian Environment Review System (PERS) audit was undertaken and concludes that the pedestrian environment is generally of a good quality and gives no cause for concern. However, the PERS audit also identified a few issues that would need addressing, such as a lack of rest points in certain locations; concerns with personal safety in the vicinity of Wembley Stadium station; legibility difficulties due to contradictory signage on the High Road. TfL expects these issues to be addressed and it is understood that the details of pedestrian improvements will be discussed as part of the reserved matters process.

Highway Impact

150 The highway impact assessment concludes that the proposal will attract fewer person trips when compared with the Stage 1 masterplan and NWL consents, and Wembley Retail Park combined (the baseline). A decrease in vehicle trips is predicted for the weekday PM peak and Saturday peak periods. Some junctions in the vicinity of the site will experience an increase in vehicle movements in the AM peaks but the increase in vehicle movements are found to be slight, in the order of 30 or less two-way vehicle movements during the assessment periods. The removal of the large food store partly explains the reduction in vehicle trips in comparison with the baseline. TfL nevertheless requires a condition limiting the individual retail unit sizes.

151 The junctions which were found to experience an increase of more than 30 vehicle movements in the AM peak were subjected to a more detailed analysis. The junction of interest to TfL is the A406 North Circular/ Drury Lane, which is part of the TLRN. The capacity analysis at this junction shows that the increase in vehicle movement will equate to 1 additional vehicle per minute. The conclusion reached is that this junction will not be materially impacted. TfL remains however concerned that there could be impacts on bus operations. The highway impact assessment should therefore test the impact of development traffic on bus operations.

152 TfL notes that there are outstanding highway improvement works and interventions identified under the Stage 1 masterplan and NWL, as well as additional highway interventions to be implemented under the current proposal. TfL seeks clarification from Brent Council as to the elements of the highway improvement works secured by the Stage 1 masterplan Section 106 agreement that has been delivered so far and assurance that that the outstanding highway improvements works will be secured by Section 106 agreement.

Public Transport Impact

153 In terms of the net public transport impacts, the proposal was found to generate an additional demand of 47 trips on each service operating at Wembley Stadium station during the AM peak period. On London Overground (LO) and London Underground (LU) services, the assessment shows an overall net reduction in trips during the AM and PM peaks. An increase in demand is predicted on some services but these increases are negligible (between 5 and 9 additional trips on the services affected). In accordance with the advice given during the TfL pre-application discussions the applicant is required to take account of the impact of the proposal on public transport services on event days, particularly where events overlap with the weekday PM peak.

154 The bus impact assessment shows a small net reduction in bus trips compared to the baseline. Changes to the consented land use quanta for Stage 1 and NWL such as the removal of the large retail food store and changes in the network such as improved bus services explains the reduction in trips by bus. The applicant envisages smaller retail units that would generate fewer trips, mainly internal trips, resulting in a reduction in trips on existing services compared with the consented schemes. Notwithstanding the conclusion above the development will generate a considerable demand on bus services in the area. To put this demand into context, the bus impact assessment for the Stage 1 consented masterplan application shows a net demand of 958 two-way bus trips in the AM peak and 1,204 two-way trips in the PM. The proposal is predicted to generate slightly less bus demand than the consented Stage 1, NW Lands consents and Wembley Retail Park combined but the generated bus demand is considerable nonetheless.

155 TfL will be seeking an appropriate level of financial contribution towards bus improvements to provide the additional capacity needed to support the development. The WAAP forecasted that without the addition of another route to Wembley Eastern Lands, mainly required to access, connect and provide capacity for this area of the stadium, the frequency on route 206 would need to be increased substantially to cater for the increased demand. The cost of increasing the frequency to 11 buses per hour during the peaks is estimated at c.£2m in the end state. Additional to increasing the frequency of route 206 would be to extend bus route 440 to Fourth Way. The proposal is to extend this route to Wembley Stadium to provide the required capacity in the eastern parts of the site. This would introduce a third route to this area in addition to routes 92 and 206. The cost of extending route 440 is estimated at around £466,500 per annum or c.£2.3m over five years. The overall funding required to increase the frequency of route 206 and deliver the extension of bus route 440 is £4.3m.

156 In addition, the proposed extension of the bus routes above will require supporting bus infrastructure including new bus stops, bus stands and driver facilities that will need to be incorporated within the development. The preliminary locations of bus stops, bus stands and driver facilities should be discussed with TfL and Brent Council in order to reach an agreement in principle including any land to be safeguarded.

157 The application includes a Framework Delivery and Servicing Plan, which describes the details of provisions for delivery and servicing. The DSP contains details of the servicing trips by land use (indicative only), measures and targets, arrangements for managing, monitoring and reviewing the DSP. The DSP also includes provisions for servicing during events at the Wembley Stadium. TfL considers the DSP to be generally acceptable and expects the full DSP to be secured by condition and approved by the Council prior to occupation of the development.

158 The application includes a Framework Construction Logistics Plan. The CLP is considered to be generally acceptable. TfL 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 the Council prior to commencement of construction on site.

159 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>.

160 TfL welcomes the submission of a Framework Travel Plan. The provisions contained in the document are considered to be generally acceptable. The full Travel Plans will need to be submitted to the Council for approval prior to the occupation of the development and should include provisions for reviewing and monitoring. The Travel Plan should be secured through the Section 106 agreement.

161 Brent Council adopted its Community Infrastructure Levy (CIL) charging schedule in July 2013. Residential uses (including student accommodation) are charged at £200 per square metre, hotels at £100 per square metre and retail uses at £40 per square metre. The Council's Regulation 123 list identifies that this can be spent on 'roads and other transport facilities' and TfL would welcome further discussion with the Council as to how CIL may be used in the Wembley area.

Conclusion

162 In summary, TfL requires additional information and further assessments to address the following points: (1) clarification of the number of coach parking spaces that will be accommodated in the Green Parking Zone and an explanation as to why the application does not include the full 168 coach spaces that will be permanently accommodated in the Green Parking Zone; (2) the pedestrian analysis referred to Section 7 of the TA should be made available for review by TfL; (3) the highway impact assessment should take account of the impacts of the increased development traffic on bus operations; (4) the applicant is required to take account of the impact of the proposal on public transport services and the highway network on event days, particular on events which overlap with the PM traffic period.

163 Finally, TfL wishes to engage with the applicant and Brent Council to agree on the bus improvements needed to provide the additional capacity needed to support the development and an appropriate level of financial contribution to fund these improvements.

The Mayor's CIL

164 In accordance with London Plan policy 8.3, the Mayoral Community Infrastructure Levy (CIL) has been in effect since 1st April 2012. All new developments that create 100 sq.m. or more of additional floor space are liable to pay the Mayoral CIL. The levy is charged at £35 per square metre of additional floor space in the London Borough of Brent.

The applicant can estimate the future CIL charge by referring to the Greater London Authority website <http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy>

Local planning authority's position

165 Brent Council officers are supportive of the application.

Legal considerations

166 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

167 There are no financial considerations at this stage.

Conclusion

168 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 (masterplan):** The quantum of floorspace and land uses proposed is substantial but the optimisation of residential and non-residential output and densities is expected in Opportunity Areas and the overall floorspace and land use mix is supported. This support is however dependant on ensuring issues relating to maintain the coach and car parking requirement of Wembley Stadium operation and further assurance is required in relation to this issue.
- **Principle of development (Blue Multi-storey Car Park):** The principle of the car park proposal is supported as this will deliver a key element in the delivery of the masterplan as it enables the removal of large areas of surface car parking. Notwithstanding this the applicant should provide clarification on how the car parking meets the operation needs of Wembley Stadium during the development phases of the masterplan and the effectiveness of the proposed design solution on efficiently coping with Wembley Stadium events.
- **Housing:** The information provided in relation to housing mix and affordable housing is not compliant with the London Plan policy as insufficient information and detail has been provided for the outline application to be determined in relation to London Plan policy. This is because the housing mix and affordable will be delivered through phased development which will require approval through reserved matters and the Mayor does not have statutory powers to review reserved matters applications.
- **Density:** Given the masterplan covers a number of sites located within identified Wembley OAPF area the proposed density is supported given that OAPF policy encourages a higher density of development. This support however is dependent on the securing of improvements to the public transport network to enhance PTAL accessibility.

- **Retail:** The principle of locating retail floorspace in the masterplan is supported by local plan policy and does not raise any concerns in relation to having significant adverse impact to the London Plan hierarchy of retail centres.
- **Office/ employment:** The masterplan land use mix includes 82,000 sq.m. (gross) of B1 commercial floorspace across the development sites. This quantum of B1 office floorspace is supported by AAP policy WEM 9, whilst the London Plan in Table A1.1 Opportunity Areas.
- **Urban design (masterplan):** The overall layout principle of structuring the masterplan around a new organic form public park, retaining and building on the exiting street structure and defining the western edge of the Boulevard with ground floor retail use led development to create a strong high street form is strongly supported.

The massing approach is based on the height of building rising to the north and to the south of the stadium, whilst dropping in height to the proposed park. This overall strategic approach is supported.

The Wembley AAP establishes a local viewing framework which primarily protects views of Wembley Stadium and especially the stadium arch and the masterplan development impacts do not raise any strategic concerns.

There is a specific requirement to include some guidance on the range of predominant materials/finish to be used across the development on facades and roof treatments. The buildings in the illustrative plans designs look very bland and lack richness that would be expected in a new city neighbourhood.

The applicant has provided parameter plans and development principles document to secure the masterplan development form design quality. Whilst this is welcome it should include the suggested design principles in the finalised documents which should be secure by condition.

- **Urban design (Blue Multi-storey car park):** The design of the building and the approach to its articulation area supported
- **Access:** As the masterplan is an outline application the applicant must demonstrate that the masterplan has inclusive design imbedded at the outset and this has been achieved. This aspect of application is compliant with the London Plan.
- **Children & young person's play:** Parameter plans and the development specification secures the broad principles of providing playspaces for different age groups and this is welcome. Whilst this is welcome the applicant should sets out the expected child yields, resultant play space requirements based on the Shaping Neighbourhoods: Play and Informal Recreation SPG 2012 and indicate the types of playable features that will be provided.
- **Energy:** Based on the energy assessment submitted at stage I the energy strategy results in a reduction of 1,940 tonnes of carbon dioxide per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 36%. The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan. However, the comments above should be addressed before compliance with London Plan energy policy can be verified.

- **Flood risk:** Given that this is a Masterplan it is appropriate to apply a suitable planning condition requiring detailed designs of each plot to consider the residual surface and reservoir flooding risks and a suitable condition should be applied to any planning permission, requiring the details of the drainage of each plot to be in line with this strategic Drainage Strategy and agreed by Brent Council Lead Local Flood Authority.
- **Air quality:** The applicant is encouraged to adopt the highest standards, for instance making the development a Low Emissions Neighbourhood (LEN),
- **Transport:** The applicant should respond and hold further discussions on issues raised by TFL in relation to access & parking, pedestrian & cycling, Highway Impact and public transport impact. Particular attention should be given to the resolution of the re-provision of coach/pedestrian parking for Wembley Stadium.

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