

## Survey:

What is your name Ben Ford

What is your organisation (if applicable) Quod (c/o Barratt London and Transport for London)

1. Which part of the Plan are you commenting on? Please refer to supporting letter

Policy:  x Paragraph:  x Table:  x Map:  x

2. Do you consider the Plan is:

Legally compliant? Yes:  No:

Sound? Yes:  No:

3. If you believe the Plan to be unsound, is this because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

4. Please give reasons for your objection or support:

Please refer to the supporting letter

5. What change(s) do you consider necessary to make the Plan legally compliant or sound?

Please refer to the supporting letter

6. If your representation is seeking a change, do you wish to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

7. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The issues raised in the submission are of sufficient strategic importance to raised in Oral examination.

**If you would like to comment on additional policies, please fix another sheet to this.**

To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. The LPA will therefore ensure that the names and addresses of those making representations can be made available and taken into account by the Inspector. The Council, its appointed Local Plan Programme Officer or the Planning Inspector appointed to undertake the Examination may also contact you regarding your response.

Please indicate if you wish your personal data to be used for reasons other than identifying your representation and being contacted in relation to that representation.

**Our ref:** BF/Q100200  
**Your ref:** -  
**Date:** 05 December 2019



Strictly Private & Confidential  
London Borough of Brent  
Planning Policy Team  
Brent Civic Centre  
Engineers Way  
Wembley  
HA9 0FJ

Dear Sir/Madam,

## **London Borough of Brent – Local Plan - Regulation 19 Consultation Representations submitted on behalf of Barratt London and Transport for London**

Quod are instructed by our client's Barratt London and Transport for London to submit representations to the Local Plan: Proposed Submission Document, that has been prepared by the London Borough of Brent ('the LBB') as part of the Regulation 19 Consultation.

Representations are made in respect of the emerging policy context of draft Site Allocation – BCSA7: Wembley Park Station (North & South) and the emerging Wembley Park Tall Building Zone that is designated within the draft Local Plan Policy Map (Map 2 – Employment, Heritage and Environmental Protection). We trust that the representation hereby submitted provides a constructive commentary to the draft Local Plan Site Allocation and Policy Map and highlights practical and commercial deficiencies of the Regulation 19 - Local Plan.

We request that the content of this representation is taken into full account as part of the consultation exercise, of which we would welcome the opportunity to meet with the Council to discuss draft Site Allocation BCSA7: Wembley Park Station (North & South).

### **Background**

Barratt London and Transport for London are seeking to deliver a residential led mixed-use scheme on the south site of Site Allocation BCSA7, within the Wembley Growth Area.

The site is brownfield land located to the south of the London Underground line that serves Wembley Park Station and the Chiltern railway line. As shown in Figure 1, the site is bound to the south by Brook Avenue, to the east by Wembley Park Station, to the north by aforementioned rail lines, and to the west by the residential development known as Matthews Close. The site currently contains London Underground train crew accommodation offices, other operational accommodation and surface level car parking.



Figure 1: Wembley Park – Site Boundary



\* The existing building is 9 commercial storeys in height. This height is roughly comparable with 11 residential storeys.

### Wembley Park Tall Building Zone

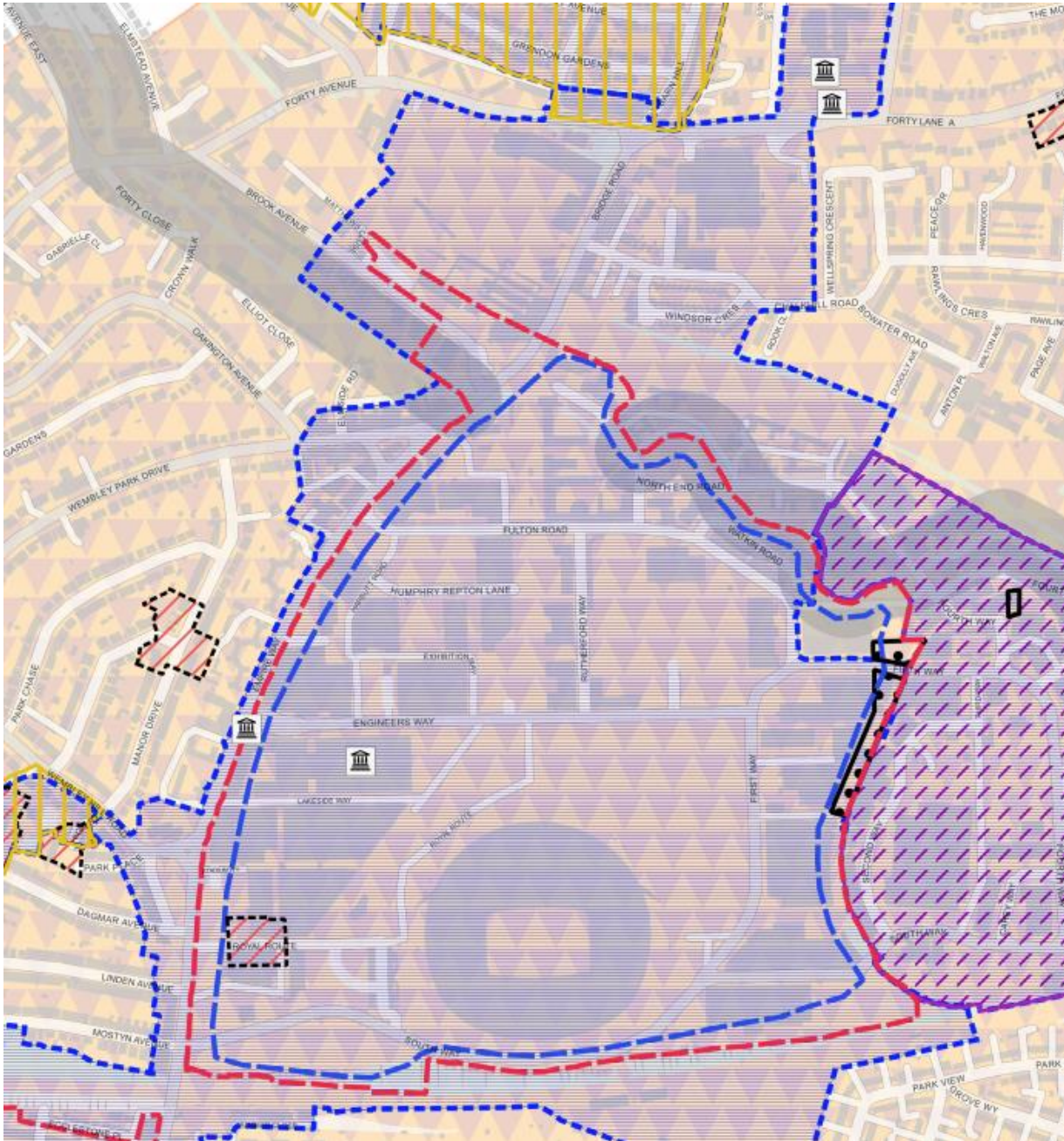
The Local Plan identifies the site within the ‘Wembley Park Tall Building Zone’ as informed by the Brent Tall Building Strategy that forms part of the draft Local Plan’s evidence base. Draft Policy BD2 states that tall buildings (defined as more than 30 metres or more than 6 metre above the prevailing height) shall be appropriate within locations identified within a Tall Building Zone by the Local Plan Policy Map. We are supportive of the Brent Tall Building Strategy’s approach and the inclusion of the Wembley Park Station South site within the designated Tall Building Zone.

The Tall Building Strategy (October 2019) and draft Local Plan Policy Map (October 2019) define two tall building areas within the Wembley Park Tall Building Zone. As shown in Figure 2, the ‘Core’ area is denoted by the blue line with the wider ‘Zone’ area denoted by the red line, which indicates the geographical extent of the Tall Building Zone. In accordance with emerging Policy BD2, the overarching ambition is that the tallest buildings will be clustered within the ‘Core’ area, with a transition of building heights stepping down between the ‘Core’ and ‘Zone’ areas.

As shown in Figure 2, the entirety of the allocated South site is contained within an area between the ‘Core’ and ‘Zone’ of the Wembley Park Tall Building Zone.

### Proposals Map

Figure 2: Draft Local Plan Policy Map 2019 – Map 2 (Employment, Heritage, and Environmental Protection) (October 2019)



The site is located adjacent to Wembley Park Station, which in accordance with the emerging new London Plan (2019) makes it a highly accessible location that is suitable for high density development and is a strategic source of housing under Policy H1. Moreover, the eastern extent of the site sits directly adjacent to the station entrance and should be considered as entirely appropriate for a tall building, both to maximise housing delivery and increase the legibility of the area through the delivery of a landmark building to signpost Wembley Park Station. The principle of a landmark building in this location is further supported on account of the site's adjacency to the existing Wembley Tall Building Zone – Core.

The BCSA7 South site already forms part of a tall building cluster along Brook Avenue. To the west of the site, outside the Tall Building Zone are 3 residential blocks an equivalent of 10 storeys (Matthews Close). The development at Matthews Close are 8 storey buildings plus podium, which sit upon raised land approximately one storey above Brook Avenue. To the south of Brook Avenue, along two thirds of the South site's frontage are three tall buildings; the Premier Inn at an equivalent of 11 residential storeys; Wealdstone Court at 10 storeys and Pearce House at 8 storeys. The character of the area is therefore appropriate for tall buildings at an equivalent or taller height.

In view of the above, it is proposed that the boundary of the Tall Building 'core' area be extended to encompass the full extent of the South of site allocation – BCSA7: Wembley Park Station (North & South).

### Site Allocation – Design Principles

Generally, it is considered that the Design Principles set out for the South site of draft site allocation BCSA7: Wembley Park Station (North & South) are appropriate to the site's context, opportunities and constraints.

However, the wording of paragraph two of the Design Principles for Site Allocation BCSA7 does not yet fully reflect the potential and suitability of the South site to accommodate tall buildings on account of its direct proximity to Wembley Park Station, associated high PTAL accessibility, and surrounding tall building context. The Site Allocation should also recognise the presence of the completed Matthews Close development, which at 10 storeys equivalent does not allow the South site to 'step up' in height towards the Tall Building Zone - Core, leading to a consistent building height along Brook Avenue that directly conflicts with draft Policy BD2.

Paragraph two of Local Plan (Regulation 19)– Site Allocation BCSA7 currently states:

*The southern site is adjacent to a mixture of residential and commercial buildings. Up to ten storeys will be considered acceptable to the western side of the site stepping up slightly directly adjacent to the station (all subject to impact on protected views of the stadium)*

Whilst we are supportive of the text acknowledging the potential for tall buildings, we recommend the following amendments: -

- The removal of the words "up to" and "slightly directly adjacent".

The suggested amendment would ensure that the site potential can be optimised, reflecting the tall building cluster that designates the South site.

### Site Allocation – Allocated Use

The allocation of Wembley Park Station (North and South) - BCSA7 for a “mixed-use residential-led development” is supported. We note however, that the Regulation 19 - Local Plan seeks to include the requirement for any future redevelopment of the site to replace the existing office space. The implied requirement was not included as part of the previous consultation of the Local Plan and we consider the requirement to be unnecessarily prescriptive, particularly as the existing office space is ancillary to the London Underground train crew accommodation and does not therefore represent a standardised B1a office use.

Accordingly, we recommend the following amendment be made to the ‘Allocated Use’ for Site Allocation BCSA7:

- The removal of the words “to include replacement of the existing office space”.

### Summary

In summary, we request that the below changes are made to the Brent Local Plan Site Allocation – BCSA7: Wembley Park Station (North & South) and Local Plan Policies Map (Map 2 – Employment, Heritage and Environmental Protection).

Element	Proposed Revision
<b>Extend the ‘Core’ Wembley Tall Building Zone boundary</b>	Extend the Core (blue hatched) Tall Building Zone to encompass the full extent of Site Allocation BCSA7 – South site.
<b>Revise Design Principle wording for Site Allocation BCSA7</b>	“The southern site is adjacent to a mixture of residential and commercial buildings. Ten storeys will be considered acceptable to the western side of the site stepping up in height to the station (all subject to impact on protected views of the stadium)”
<b>Revise Allocated Use wording for Site Allocation BCSA7</b>	“Mixed-use residential-led development”

We trust the case set out above is clear and our representations will be taken into account as part of the Regulation 19 Consultation, to which we would be happy to discuss in further detail.