

BY POST AND EMAIL paulwinter@paulwinterandco.com

Mr P Winter
Paul Winter & Co
Fleet House
8-12 New Bridge Street
London
EC4V 6AL

19502/A3/VB/ac

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Dear Mr Winter

BARNET LDF MATTER 1 SPATIAL STRATEGY

I write with regard to the above and further to the above Hearing Session and our subsequent discussions today.

Through our Written Submissions and in response to Inspector's questions yesterday, we confirmed that it is our position that the approach of Policy CS2 is unsound. However, that our concerns could be addressed through a commitment within the wording of the policy to review the provisions of the adopted SPG 2005 and formulate a new SPG or appropriate policy document as necessary. The Inspector requested that the Council review this suggestion ahead of the Matter 9 Hearing Session tomorrow.

You have requested clarity as to my position and have requested that we set out suggested wording that would address our concerns. Specifically if I have understood our discussions, it is your position that:

- The carrying over of the UDP Policies and SPG has been addressed through the Local Development Scheme and other legislative provisions and are not matters for consideration as part of the Core Strategy Examination.
- There has not been a material change in circumstance since the adoption of the SPG in 2005 to warrant a review.
- Notwithstanding the above, that a review would not serve a meaningful purpose as there is an extant planning permission (the BXC permission) and only the former Parcellforce site at Geron Way is not the subject of an extant grant of planning permission.

In my view there are two approaches that the Core Strategy can take in respect of Brent Cross Cricklewood area:

- 1) If the Council are certain that the BXC permission will be the subject of timely implementation and will be completed in its entirety, and does not wish to make policy provision in any event, then there is no need for the Core Strategy to include any policy



guidance and the site should be identified in the relevant housing and employment trajectories as a commitment.

- 2) If the Council consider that a review of the BXC permission is likely or wishes to make policy provision for any review during the lifetime of the development plan then the Core Strategy should set out the policy context to guide any subsequent applications. This policy should include a review of existing policy documents and their hierarchy and this should in turn be subject to SEA and SA testing as necessary.

On the basis that the Council has chosen to include a policy drafted in the manner that it is, this would imply that the Council anticipates a review of the BXC Permission or at least a need to provide for such a review in policy.

In terms of the existing policy context, the SPG 2005 was prepared in the context of the London Plan 2004. The UDP was then adopted in 2006 pursuant to the planning regime prevailing at that time. Policy CS2 cross refers to the saved policies of the UDP 2006 and the Development Framework SPG 2005 as the policy mechanisms to guide and determine new applications against, unless and until replaced by new DPD or SPD. The decision as to whether to undertake a review will be informed by LDF monitoring and the monitoring of the implementation of the BXC permission.

Our concern relates to whether the above approach is justified and whether it is based on a robust and credible evidence base and whether it is the most appropriate strategy when assessed against reasonable alternatives. Moreover, whether the approach is flexible and therefore 'effective'.

I note the Council's position regarding the UDP policies and SPG is a matter for the Local Development Scheme and other legislative provisions and is separate to the Core Strategy DPD. Whilst I do not comment on the lawfulness of the approach, that may well be for others at the appropriate time and place, on the basis that Policy CS2 expressly relies and effectively defers policy decisions to these documents then the Inspector must consider whether they are fit for purpose when he is considering the soundness of Policy CS2 and the Core Strategy DPD as a whole. Do they remain a valid and appropriate basis for policy?

You have advised that in any event you do not consider there to be a material change in circumstance since the adoption of the SPG 2005 that would necessitate a review. The issue here is that this review and assessment has not been undertaken as part of the evidence base for the Core Strategy DPD or subject to SEA testing. Neither the Council nor the Inspector can therefore be certain as to the soundness of the suggested approach within Policy CS2. Without any evidence of testing, your position is merely an assertion.

My concern is that since the Adoption of the SPG there has been a material change of circumstance, specifically there are challenging market conditions, public subsidy regimes have changed for affordable housing there have also been changes in policy such as the London Plan 2011.

We have suggested that our concerns in this regard could be addressed by an express policy commitment within Policy CS2 to undertake such a review of the SPG and formulate a new SPG or appropriate policy document as necessary. If the Council is of the view that there has not been a material change in circumstance and that the submission of an application in the current market conditions would not be assessed differently then there is no harm in the Policy including this provision for review.

As discussed, and as set out in our Written Submissions in respect of Matter 9, in our view there is a need for a different approach to Policy CS2. As drafted it reads as a summary of the current position of the BXC permission rather than a policy framed to address a 15 year plan period.

In our view if the Council decide to proceed with the second approach set out above, the Policy should be redrafted to stand alone of the extant planning permission and formally identify the site

as a Strategic Location/Site. It should also then set out the strategic policy objectives and growth targets that are to be achieved from the area and include the commitment to review the SPG or produce a new DPD as appropriate to provide the policy basis to determine any future planning applications against.

You have requested suggesting wording to assist understanding our position. To assist, I attach an extract from the LB Brent Core Strategy July 2010 in relation to the Wembley Opportunity Area. Like Brent Cross Cricklewood this area was the subject of Framework for Development Destination Wembley adopted as SPG September 2003, the UDP was Adopted January 2004 with a further Masterplan document prepared but not adopted as SPG in 2004. Quintain, a major landowner, then secured planning permission in 2004 for the masterplan area and this was used as the basis to CPO sites within it. Having already reviewed and adopted an updated SPD in 2009, the approach of the Core Strategy has been to set out the policy objectives for the area and a commitment (see para 4.42) to review and consolidate guidance for the Wembley Area into an AAP.

I would suggest that this is the approach that the Barnet CS should take.

I trust that the above is of some assistance.

Yours sincerely

VICTORIA BULLOCK
Director

cc: Programme Officer Vijaya.Ram@barnet.gov.uk

Enc.

Strategic Area Policies

Wembley Growth Area

4.31 In line with the council's 2007 Vision for Wembley, the planning strategy for the area aims to promote the regeneration of Wembley as a regional sports, entertainment and leisure destination, taking advantage of the opportunities presented by the Stadium development and the potential for development of sites in the surrounding area. The aim is to achieve a critical mass of visitor attractions, building on the area's current role as a major leisure and entertainment centre for London. Wembley will become an all year round visitor destination catering for a range of entertainment and leisure activities as well as Stadium and Arena events and conferences. In addition, new jobs will be available through the provision of new office accommodation in with the comprehensive development of the area. The existing town centre will also be regenerated by allowing its expansion eastwards and by ensuring that the physical linkages to the regeneration area to the east, especially pedestrian routes, are improved. The first stage of this improved link, the new White Horse Bridge across the Chiltern line, is already in place.

4.32 Wembley town centre's eastwards expansion is committed through existing permissions for the development of a number of sites including Copland School, land adjacent to Wembley Stadium station and the White Horse Bridge and land to the west and north of the Stadium; all as mixed use development sites. The Wembley town centre boundary, as defined on the adopted Proposals Map, takes account of these consents, two of which are under construction. The council will also produce design guidance for the High Road sites between Chesterfield House and Wembley Triangle based upon the study of the area produced for the council in 2005⁸².

4.33 The council's key spatial objectives include revitalising town centres and securing regenerative development in Wembley which is strategically important to London as a whole.

4.34 Wembley is the main shopping destination within Brent. However, it is clear that a relatively low proportion of shoppers do their main shopping in Wembley^{42,44}. Brent's centres do not operate in isolation but are influenced and affected by neighbouring retail locations such as Brent Cross, which is a regional shopping centre. Harrow and Ealing are neighbouring Metropolitan centres which will also continue to attract some of the retail expenditure of Brent's residents and the recently opened shopping destination Westfield, and London's principal shopping destination West End, will also attract shoppers from the borough.



Picture 4.1 : Wembley High Road

4.35 All these centres will compete with Wembley for shoppers and Wembley will need to secure representation from multiple retailers. It is thus proposed that Wembley becomes Brent's pre-eminent centre for the following reasons:

- To secure its Major centre status, and attract regenerative investment to ensure future growth.
- It is the main focus of civic function in Brent and the level of development should complement this role, particularly in view of the proposed future expansion eastwards.
- It is the only Major centre wholly within the borough, and there are opportunities for expansion.

4.36 Town centre uses are those defined in paragraph 7 of Planning Policy Statement 4: *Planning for Sustainable Economic Growth* (PPS 4), including: retail, leisure and offices.

4.37 The council has produced a Masterplan to consider the next phases of development in the stadium area. It is estimated that some 5,000 homes will be built by 2017 in the whole of the Wembley growth area. The Masterplan considers the subsequent development which will occur after 2017. This proposes 10,000 jobs and at least a further 5,000 homes. New mixed use development is proposed north of Engineers Way and east of the Stadium that will provide jobs in new shops, offices, creative workspaces, hotels and other leisure uses.

4.38 Whilst much of the area will be redeveloped, providing significant job opportunities, regard should also be had to the needs of existing businesses. Where businesses may need to relocate as a result of redevelopment then the council will assist in securing alternative sites locally.

4.39 The Masterplan proposes linking the two retail areas of Wembley and Wembley Park. The development of this new retail street is a long term proposal and its development is contingent on creating a continuous retail link from the High Road. The creation of this new shopping street will help facilitate the redevelopment of the eastern end of the High Road, creating a continuous retail link. Together with the delivery of the housing, commercial, retail, leisure and community facilities proposed in the Core Strategy, the new shopping street will be the driver for change in this part of Wembley. Offices and hotels are proposed around Olympic Way which will maintain its function as the processional route to the stadium. Major new visitor attractions are proposed for the Masterplan area. The council is also working up proposals for a new civic centre with associated community facilities. The Wembley area is suitable for tall buildings, and planning guidance such as the Wembley Masterplan has identified suitable locations for buildings at, or over, 30m high.

4.40 The continuing housing growth will be accompanied by a range of supporting facilities such as new/expanded education facilities, new health provision and space for recreation and play. There are proposals to build a new secondary school on part of the former Wembley Park Sports Ground (under construction July 2010), and Copland School is to expand on its redevelopment, which has planning consent. The additional housing growth planned after 2017 will require additional new primary school(s) in the stadium masterplan area, in addition to the Wembley Park 'all-through' school, and require other secondary schools to be expanded. The new population will require up to six more GP's, a new publicly accessible swimming pool, a new park and series of pocket parks and a range of other community facilities⁵⁶. This includes the Wembley Live! Development, a cultural hub providing space and classes for music, dance and performance. Development along the Wealdstone Brook will be expected to respect and enhance the waterside location to take advantage of amenity value, enhance biodiversity and address issues of flood risk.

4.41 The council will continue to seek significant improvements to public transport accessibility with further improvements to Wembley Central and Wembley Stadium stations a priority, together with the improvements of orbital links, especially linking the key strategic growth and regeneration areas. New and improved services will run through the Wembley Masterplan area. This may include the introduction of FastBus, a proposed express orbital bus route linking Wembley, initially with Park Royal, but with the capability of extending eastwards to Brent Cross/Cricklewood as that development comes forward. In addition, in order to allow for comprehensive development north of the Stadium, whilst maintaining good safe pedestrian north-south movement, it is important to provide an improved east - west road link, including for buses.

4.42 In addition to the Core Strategy, planning policy for the Wembley growth area comprises relevant saved UDP policies, supported by the Wembley Masterplan SPD (adopted in June 2009). The council is progressing a Site Specific Allocations DPD which, on adoption, will include planning policy for specific sites within this area. It is also the council's intention to review and consolidate detailed policy and guidance for the Wembley area into an Area Action Plan. This will provide an opportunity to undertake a review of infrastructure requirements for this growth area.

4.43 As Wembley is transformed, it will become the economic engine for Brent. It will be an exciting, diverse, and sustainable high density urban place, exploiting its excellent public transport and links to the City and the West End. Building upon its international brand for sport with Wembley Stadium at its heart, a thriving city quarter will be developed, generating a new identity for the borough. Wembley will become a destination in itself, not a place to travel through.

4.44 A comprehensive range of leisure and commercial facilities will be delivered. Wembley will have a modern, service based economy comprising retail, sport, offices, conference facilities, hotels, leisure, tourism and visitor attractors, creative industries and a regenerated industrial estate, supported by training and skills development such as Brentin2Work.

4.45 The existing Wembley town centre will be supported through opportunities for new retail development which will service local needs, as well as hotels, street markets, family housing and a direct physical link to the new boulevard.

4.46 Building upon improvements made to Wembley Stadium, Wembley Park and Wembley Central stations, a number of bus routes will penetrate the area, providing further connectivity while pedestrian and cycle movement will be promoted along a series of shared surfaces supported by the highest quality of public realm.

4.47 Wembley presents one of the largest regeneration opportunities in Europe with more than 60 hectares of land ripe for development over 30 years or more. There are opportunities for over 10,000 new dwellings on brownfield land, including affordable family homes.

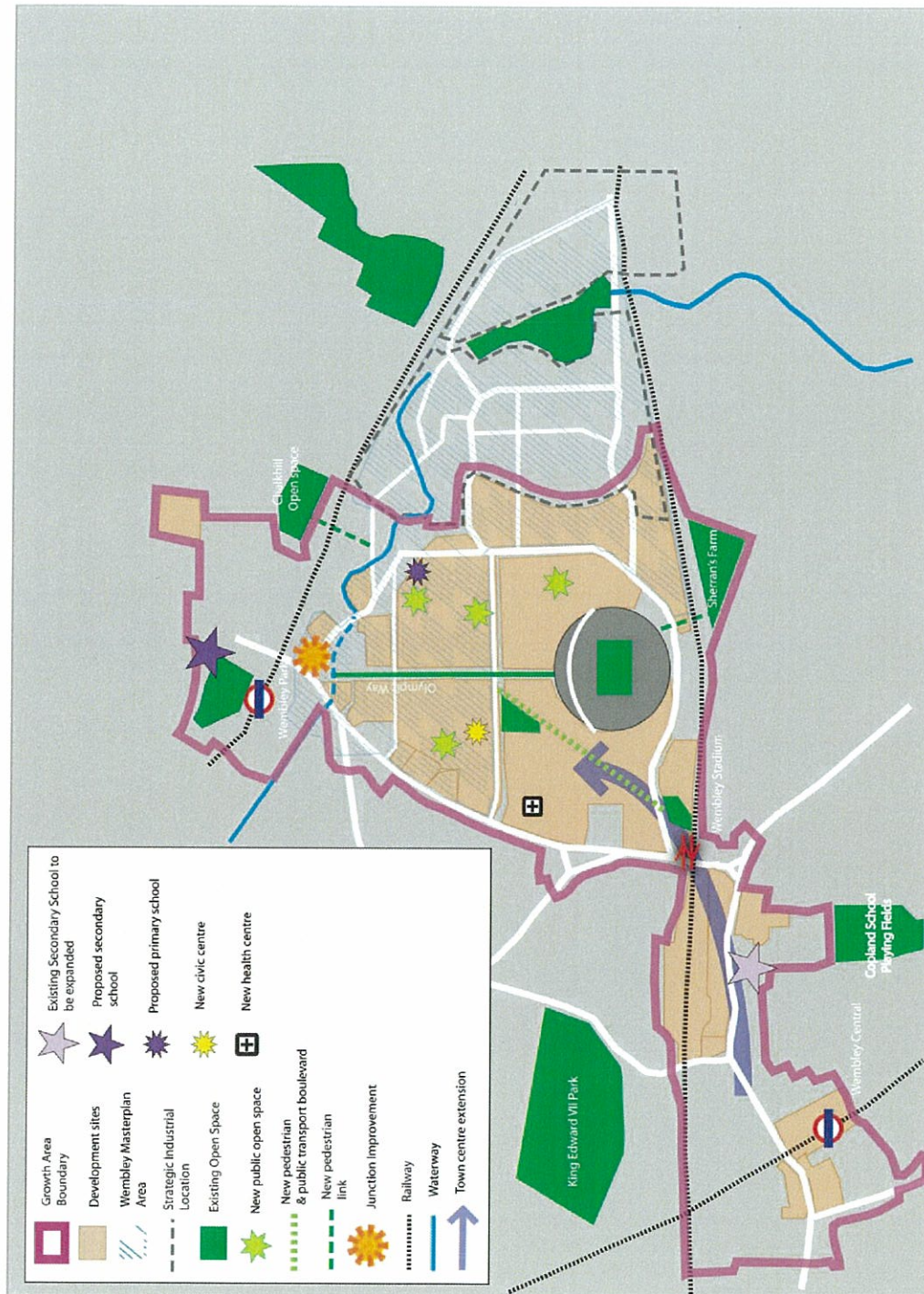
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Wembley Growth Area

Wembley will drive the economic regeneration of Brent. It will become a high quality, urban, connected and sustainable city quarter generating 10,000 new jobs across a range of sectors including retail, offices, the new Brent civic centre, conference facilities, hotels, sports, leisure, tourism and visitor attractors, creative and cultural industries and education facilities reflecting its designation as a Strategic Cultural Area for London. Around 70 hectares of land around the Wembley National Stadium and Wembley town centre will be redeveloped for at least 11,500 new homes to 2026, supported by infrastructure identified within the Infrastructure and Investment Framework. Anticipated infrastructure will include:

- New road connections
- Junction improvements
- 2 new 2 form of entry primary schools
- A new combined primary (2 form of entry) and secondary school (6 form of entry) on the Wembley Park site
- Extensions to existing local schools
- Nursery places
- At least 2.4 hectares of new public open space comprising of a new park (1.2ha min) and 3 pocket parks/squares (0.4ha each)
- Improvements to the quality and accessibility of existing open spaces
- A new community swimming pool
- Indoor and outdoor sports facilities
- Play areas
- A minimum of 1,000 trees
- New health facilities with space for 14 GPs and 11 new dentists
- Combined Heat and Power plant, if financially viable
- New multi use community facilities

As identified on the Proposals Map, Wembley town centre will be extended eastwards to facilitate a further 30,000sqm net of new retail floorspace in addition to that already granted planning consent.



Picture 4.2 Wembley Growth Area Key Diagram (illustrative only)