

## Examination of the Wembley Area Action Plan

---

Mr Ken Hullock  
Planning & Transport Strategy  
Brent Council  
Brent House 349-357 High Road  
Wembley  
Middlesex  
HA9 6BZ

Inspector: Ms Christine Newmarch  
BA(Hons) MRICS MRTPI

Programme Officer: Chris Banks  
Tel: 01403 253147  
Mobile: 07817 322750

Ken.Hullock@brent.gov.uk

E mail: banksolutionsuk@gmail.com

Date 25 July 2013

Dear Mr Hullock

Further to the Council's submission of the Wembley Area Action Plan (AAP), I have identified a number of matters and issues on which I require further information. I have set out a number of initial questions below. I would be grateful if you would respond within 2 weeks so that I shall be able to assess whether an Exploratory Meeting may be required, or whether it will be possible to proceed directly to a Pre-Hearing Meeting or the Hearing Sessions.

### **Matter 1: Procedural matters, Vision and Objectives**

#### **Issue 1.1 Procedural matters**

I note that the purpose of the AAP: to provide a strategy for growth and regeneration for a period of 15 years – up to 2026.

The Council's Core Strategy (CS) was adopted in 2010 and the Site Specific Allocations Development Plan Document (SSA) in 2011. The evidence base for the AAP is mainly as for the CS and SSA, supplemented with more recent material. However, this approach predates the National Planning Policy Framework (Framework), which requires each local planning authority to produce a local plan for its area – in whole or part - to respond to changing circumstances. Any additional documents should be used only where clearly justified.

**Question 1: Given that the London Plan identifies Wembley as an Opportunity Area and that Wembley is identified as an Area for Regeneration and Growth in the CS, does this strengthen the case for this plan, or is the AAP now unnecessary?**

**Question 2: London Plan indicates Wembley should provide new housing and leisure related development to be integrated with the iconic stadium, provide upgrades for 3 stations, improved public transport, regeneration of the vitality and viability of the Wembley town centre, including expansion eastwards; to enhance permeability and connectivity to its hinterland, to provide a civic**

**facility and a new school adjacent to Olympic Way; to identify town centre boundaries, primary and secondary shopping centres. Does the AAP address other matters, such as social infrastructure, response to climate change, food growing and wildlife policies, which go beyond the plan's remit? If so, are these policies justified, and what impact do they have on the soundness of the AAP?**

**Question 3: Is the title 'Action Area Plan' still appropriate, or should it now make reference to forming part of a Local Plan?**

**Question 4: Has the AAP been tested against the Framework? Is a document available to show how it complies, and where any deficiencies may be? What impact would any such deficiencies have on the soundness of the AAP?**

**Question 5: What is the relationship between the sites identified (W1, W3-W10) in the SSA and the 31 Proposals Sites in the AAP? How have the additional sites been identified and justified?**

#### Issue 1.2 The Duty to Co-operate

The duty of cooperate is dealt with in the consultation statement.

**Question 6: Has the Council received or become aware of any objections or corrections to this?**

#### **Matter 2 Housing**

##### Issue 2.1 – Supply:

The CS provides that an additional 10146 homes can be accommodated in the Borough up to 2016. The CS indicates that a further 1,030 units in vacant buildings could be brought back into use.

**Question 7: How many of the units in vacant buildings which could be brought into residential use are within the AAP area?**

The CS provides that the Wembley area should provide 5,000 dwellings between 2007-2016, and 6,500 between 2017-2026.

**Question 8: Does this include units from vacant buildings?**

The AAP focuses on mixed development and does not include specific residential allocations. Its site proposals give indicative residential development capacities, derived from densities considered to be appropriate given the PTal of each site.

**Question 9: What is the cumulative total of the indicative residential capacities in the AAP? How does this relate to the requirement in the CS and SSA?**

**Question 10: Is this figure in addition to planning permissions granted since the beginning of the CS period, and how does it relate to the 5 year housing requirement, plus an additional buffer of 5% or 20%, as required by the Framework?**

**Question 11: How do the indicative housing proposals relate to the Council's Strategic housing Market Assessment and its Land Availability Assessment?**

**Question 12: As the indicative capacities for the sites have not been expressed as proposals, what mechanism would ensure the delivery of the required supply of housing units within the AAP area, and has a feasibility and/or viability study been prepared for each site?**

Issue 2.2 – Housing mix

**Question 13: How has the mix of 1, 2 and 3 bedroom units been derived from the density calculations?**

Representor Solum Regeneration submits that the AAP is unsound in relation to the indicative residential capacity of 890 units for Site W4 (High Road/Chiltern Line Cutting South).

**Question 14: How do the Indicative Development Capacities in the AAP relate to the need for larger family sized accommodation, and would the AAP meet the identified need for family accommodation? If not, where and how will the required family housing for the AAP and the Borough be provided?**

Issue 2.3 - Affordable housing:

Paragraph 7.11 - The proportion of larger social rented housing in table 7.1 falls below the London Housing Strategy Target.

**Question 15: How is this justified in Wembley? Does the Council have evidence of a lower need for larger units here, or other justification?**

**Question 16: Is the proposed provision for affordable housing in accordance with the London Plan and the Framework?**

The Council proposes a focussed change to policy WEM18.

**Question 17: Does the suggested wording conflate affordable and intermediate housing?**

**Question 18: Does this provide a sound basis for the subsidy to be recycled for alternative affordable housing in the future, and would the focussed change accord with the Framework?**

#### Issue 2.4 – Student accommodation

**Question 19: What is the basis for the limit of 20% student bedrooms in the Wembley area?**

**Question 20: Is there supporting information in the evidence base?**

**Question 21: How would this work in practice, given that the planning permissions for either market housing or student accommodation may not be implemented?**

#### Issue 2.5: - Housing for Nomadic people:

The AAP does not propose additional sites for Nomadic people within the Wembley area.

**Question 22: Where is this justified in the evidence base?**

**Question 23: Where, and by what mechanism, would the remaining identified need for the Borough be met?**

**Question 24: Does paragraph 7.37 of the AAP comply with Government Planning Policy on Travellers Sites?**

**Question 25: Does this issue go to the heart of the soundness of the AAP?**

#### Issue 2.6 – Residential amenity

**Question 26: How will the living conditions of residential occupiers, including families, be safeguarded within the mixed used areas, particularly those on routes affected by Stadium 'event day' pedestrian and vehicular traffic?**

**Question 27: How will the residential accommodation which is proposed at Site W5, above retail development, be appropriate for family accommodation?**

### **Matter 3 Town Centres, retail and employment matters**

#### Issue 3.1 – Town Centre Designations

The AAP extends the town centre designation to provide a single centre from Wembley Park to Ealing Road. Following representations from the GLA, alleging that the AAP is unsound, the Council proposes a focussed change to designate 2 separate but tangential town centres for Wembley Park and Wembley Town Centre.

**Question 28: While the proposed focussed change in relation to the boundary and the consequential changes proposed by the Council would bring the AAP into conformity with Annex 2 of the**

**London Plan, it is not clear what difference would this make in practical and policy terms?**

Issue 3.2 – Large food store: Policy WEM24

**Question 29: Where is the evidence base for directing the large food store to Wembley High Road in policy WEM24? If there is a justified need for a large food store in this location, would the deletion of part of the policy harm the soundness of the AAP?**

Representor Solum Regeneration contends that the AAP is neither legally compliant on the basis that a food store is proposed on the Copland School/Brent house site.

**Question 30: What is the relationship between this site and the Wembley high Road site in policy WE24, and what interdependence or conflict exists between the proposals?**

Issue 3.3 Strategic cultural Area – policy WEM25

This refers to 'the Proposals Map'.

**Question 31: Which Proposals map is it referring to, and where is it to be found? 2012 regulations now require a Policies map not Proposals Map.**

Issue 3.4: - The reduction in the area of the Strategic Industrial Location

**Question 32: How has the extent of the area proposed for removal from the SIL been calculated or identified?**

**Question 33: What implications does this have for employment?**

**Question 34: Does it accord with any requirements in the London Plan and the Framework?**

Issue 3.5: - Town Hall

Representor Bougues UK contends that the AAP is unsound in relation to the proposal for the Town Hall site on the basis that the range of appropriate uses for the site should include education.

**Question 35: Given that community uses are included within W24 and the uses listed does not appear to be exhaustive, how relevant is this issue to the soundness of the plan?**

**Question 36: Would the Council's proposed minor change bring the proposal in line with the planning brief mentioned by the representor?**

## **Matter 4: Transport and road proposals**

### Issue 4.1 - Road schemes:

**Question 37: What is the justification for each scheme? Does it arise principally from the Wembley Masterplan Transport Review & Strategy and from the Review of Highway network & Bridge Initiatives 2012?**

**Question 38: To what extent are the junction improvements independent of each other?**

**Question 39: Is the sequence for the delivery of the schemes important for highway safety and efficiency? If so, how would this be controlled? What mechanism would be used? Would this delay development of sites within the AAP and thus the delivery of homes and regeneration?**

**Question 40: How would the road proposals, together and/or separately, affect the 3 lane egress strategy operated by the FA? Is there a conflict between the transport infrastructure and arrangements required for the regeneration of the area and the event day needs of the Stadium?**

### Matter 4.2 - North End Road - Bridge Road improvement:

**Question 41: Is this scheme required to enable development or for event days? Is this related to the issue of bus access to the north of Olympic Way?**

### Issue 4.3 Wembley Hill/Empire Way

The FA seeks reinstatement of previous priority at junction of Wembley Hill Road and Empire Way to improve egress from the Stadium area.

**Question 42: What impact would this have on the overall transport strategy within the AAP area? Does any justification exist in relation to safety or convenience?**

### Issue 4.4 - Olympic Way ramps

The AAP, at paragraph 6.40, poses the option of removing the ramp over Engineers Way linking Olympic Way and the Stadium. Steps are suggested. The FA emphasises that that the ramps are required for the event day safe egress.

**Question 43: Why does the Council support the removal of the ramps and providing steps? Where is the justification to support the suggestion? If it is justified, why has it not been included within a policy or proposal within the plan?**

**Question 44: How would the replacement of the ramp with steps work for those with impaired mobility? What advantages would this deliver compared to any harm to public safety and convenience?**

Issue 4.5 - Parking

**Question 45: How would the parking standards proposed in the AAP relate to the London Plan and to the policies of the Framework, and how is any difference justified?**

**Question 46: Would the AAP provide effective policies for controlling pirate parking sites on event days or other occasions?**

Issue 4.6 Public transport

TfL has raised a range of matters in its representations.

**Question 47: Would the public transport proposals in the AAP be effective in supporting the regeneration and growth envisaged for Wembley?**

### **Matter 5 - Urban Design**

Issue 5.1 – Protected views:

**Question 48: Other than to correct minor errors, what is the reason for the extent of the proposed changes on the protected views list and map? Do these changes represent a change of policy with regard to protected views?**

**Question 49: What is the relationship between the protected views and the control of tall buildings, if any?**

### **Matter 6: Community Infrastructure Levy and Obligations**

Issue 1 – CIL Regulation 123 List

**Question 50: When will CIL regulation 123 list be published?**

**Question 51: What incentives are available, if any, to assist with the regeneration of the Wembley area, and is this supported by any justification?**

### **Matter 5: Maps, Diagrams and Implementation**

Issue 5.1: The status of the maps and diagrams in the AAP

**Question 52: Which document provides/will provide a Policies Map for Brent?**

**Question 53: What is the intended status of the Key Diagram and the maps relating to the Site Proposals within the AAP?**

Issue 5.2 – The status of the Land Take Maps

The maps in Appendix C of the AAP show the land required for the implementation of the road schemes included elsewhere in the document.

**Question 54: What status do these maps have, and does the Council have a timetable and/or strategy for the land acquisition?**

**Question 55: By what mechanism will the land be acquired if it does not become available through the redevelopment of larger sites? Would the AAP be effective in the absence of such mechanisms?**

Issue 5.3 Changes to the Proposals Map

The proposed changes to the Proposals Map are now the subject of proposed focussed changes.

**Question 56: Are the proposed changes and focussed changes mutually exclusive, and how would either be justified?**

**Question 57: Why are not the site proposals not included in the proposed changes to the Proposals Map? Will be AAP be effective at delivering growth and regeneration on this basis?**

**Question 58: Should the AAP policies be included on a Policies Map?**

**Matter 6: Delivery and Monitoring**

**Question 59: Does the AAP include any mechanism to take account of any shortfall which may be identified during the plan period in the delivery of the objectively assessed needs of the area?**

**Matter 7: Representors, likely appearance, focussed changes and hearings**

Issue 7.1 - Focussed changes

The Council has submitted separate tables of focussed and minor changes with the AAP.

**Question 60: What is the status of the Council's focussed and minor changes?**

**Question 61: What does 'focussed' change mean? Are these main modifications?**

The Council's table of focussed changes indicates that an agreement has been reached with the GLA in relation to focussed changes to map 8.1.

**Question 62: Is this a verbal agreement or is it supported by written submissions?**

**Question 63: Have any of the focussed or minor modifications been published for public consultation, and if so, when, how and what feedback has the Council received?**

**Question 64: Have any of the proposed changes (focussed or minor) been subject to Sustainability Appraisal, and if so, what was the outcome?**

**Question 65: Is the Council seeking these as modifications to the AAP?**

**Question 66: Has the Council produced an integrated version of the AAP including all its proposed focussed and minor changes?**

**Question 67: Do the matters which are the subject of focussed changes go to the heart and soundness of the AAP? If they are changes of policy, which are not related to the soundness of legal compliance of the AAP, it may not be possible to accommodate them.**

Issue 7.2 - Representors and hearing sessions

There are 14 representors seeking changes to the AAP.

**Question 67: Is the Council able to indicate which of these representors are likely to wish to speak at this stage?**

It is also necessary to ascertain which representors who are entitled to appear but did not express a preference, wish to be heard. It should be made clear that representations carry the same weight whether made orally or in writing. This information will have a direct bearing on the number and structure of the hearings and is required as a matter of urgency. I suggest you liaise with Mr Banks with regard to the wording of the letter.

For the reasons explained above, Wembley Stadium (FA) will be invited to speak in the discussions relating to the Olympic Way ramps and egress arrangements on event days.

Issue 7.3 - Accommodation for meetings and hearing sessions:

It is important that the examination proceeds as expeditiously as possible and that a programme is set soon so that all parties can plan and prepare.

To this end, I would be grateful if you would let me know whether the Council has prepared a timetable for the examination of, together with your assessment of which representors are likely to wish to speak in person. Please liaise with Mr Banks on this and all matters, including the early identification of appropriate accommodation for the Hearing sessions.

### *Conclusions*

Although I have raised numerous questions, I anticipate that many will be relatively simple for you answer. However, the Council should not only consider whether the matters raised are capable of being addressed (including by requesting additional modifications), but also whether the cumulative impact would harm the effectiveness, and thus the soundness, of the AAP. In essence, does the AAP, or could it be modified to, provide an appropriate balance between clarity for decision makers and the flexibility necessary to deliver the regeneration and growth of Wembley? If, upon reflection, my suggested timescale to respond is too short, or if you should decide that a suspension would be beneficial to the Council to address any of these matters, please contact The Planning Inspectorate without delay.

Yours sincerely

*CA Newmarch*

Inspector