

**THE COUNCIL OF THE LONDON BOROUGH OF BRENT
WEMBLEY AREA ACTION PLAN EXAMINATION**

PROGRAMME FOR THE EXAMINATION

MATTERS, ISSUES AND QUESTIONS

Please note that these are the only questions upon which the Inspector will be asking at the hearing sessions as all existing written representations will be taken into account, and do not need to be repeated or expanded.

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The majority of the questions relate to the soundness criteria which require the Core Strategy to be positively prepared, justified, effective and consistent with national policy.

Session 1: Monday 3 March 2014, starting at 2.00 pm

Opening and introduction - Inspector

Housing Matter

Invitations to participate: Inspector, Council, Quintain,

Issues:

Issue 1: Indicative housing provisions within the AAP:

In response to my note to the Council, Ref ID/6, the Council now accepts that to provide greater certainty about the quantum of housing which can be delivered in Wembley, the word 'indicative' should be deleted from the development capacities of the Sites Proposals in Chapters 12-15 of the WAAP.

Question 1: Notwithstanding earlier correspondence, does the Council formally request (under section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended)) Main Modifications to delete 'indicative' from Site Proposals W1, W2, W3, W4, W5,, W6, W7, W8, W9, W10, W11, W12, W13, W15, W17, W18, W20, W21, W22, W23, W24, W25, W26, W27, W28?

Question 2: Changes are proposed for the Development Capacities of the Site Proposals W6, W9 W13, W18 in the Statement of Common Ground (SOCG) between the Council and Quintain Estates & Development plc. What is the rationale for each of these proposed changes, and is there a corresponding change to the Council's evidence base to support them?

Question 3: Does the Council seek these changes as Main Modifications, and would the WAAP be unsound in the absence of such Modifications?

Issue 2: Site Proposal W19 Wembley Stadium Car Park:

The SOCG introduces a proposed additional Development Capacity of 1,500 dwellings at the Wembley Stadium Car Park.

Question 4: How has this late proposal arisen, and on what basis?

Question 5: Does it relate to the outline planning permission Ref 03/3200, which is mentioned in paragraph 13.57 of the plan, or a new proposal?

Question 6: To which part, or what proportion of the 4.5ha site does it relate?

Question 7: What impact will this have on coach and car parking, and the relationship of Site Proposal W19 to the policy WEM17?

Question 8: Is this Modification necessary to make the WAAP sound, and if so why?

Issue 3: Chiltern Line Cutting North, Site W3:

Site Proposal W3 acknowledges, among other things, that the site is within a Local Flood Risk Zone (LFRZ), and that it would support only a very limited amount of housing while seeking to maintain and enhance the biodiversity and provide some public access.

Solum Generation seeks the deletion of the proposal for 15 units of housing on the site, and submits that the proposal renders the WAAP neither legally compliant nor sound.

Question 9: Is the entire site within the LFRZ?

Question 10: Is there land within site W3 where 15 units of housing could be developed outside the LFRZ?

Question 11: Has any assessment been carried out to establish whether public access could be achieved in conjunction with housing development?

Question 12: Why would the WAAP fail to be legally compliant or sound on this basis?

Issue 4: Chiltern Line Cutting South, Site W4:

Site Proposal W4 includes, among other things, provision for 890 dwellings. Solum Regeneration seeks the deletion of the proposal, and submits that it renders the WAAP neither legally compliant nor sound.

Question 13: How does the Site Proposal W4 relate to the proposal for the Wembley Chiltern Embankments proposal in the Site Specific Allocations (SSA) Development Plan Document?

Question 14: What is the PTAL for this site?

Question 15: How has Table 7.1 of the WAAP been applied to arrive at this housing proposal?

Question 16: What proportion of the site would be required for housing to achieve the development of 890 units?

Question 17: Is this realistic given the constraints arising from the LFRZ and land take requirement for junction improvements?

Question 18: How would the use of this site for hotel or student accommodation impact on the provision of family accommodation within the WAAP area?

Question 19: Why would the Site Proposal make the WAAP fail to be legally compliant or sound?

Question 20: If the WAAP were to be modified to delete the housing proposed at sites W3 and reduce the provision at W3 and W4 together to 350 units (as requested by Solum Regeneration), what would be impact on the overall quantum of the housing provision in the Wembley area for the plan period and the requirement for at least 11,500 additional homes set out in paragraph 7.2 of the WAAP?

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Session 2: Tuesday 4 March 2014, starting at 10.00 am

Transport & Highway matters including Event Related Transport, Wembley Stadium access and egress, Land Take, shared spaces:

Invitations to participate: Inspector, Council, Transport for London, The FA Group, DP9 for UKI (Wembley) Limited; Guide Dogs for the Blind, CgMs for Costco, Quintain

Issues:

Issue 5: Bus standing facilities and the proposed pedestrian/cycle bridge across the Dudding Hill railway line:

Transport for London submits that the Transport chapter of the WAAP should be changed (at paragraph 6.10) to include a reference to bus standing facilities and the proposed pedestrian/cycle bridge across the Dudding Hill railway line.

Question 21: Are there any proposals for bus standing facilities which have been omitted from the WAAP?

Question 22: What is the status and timing of the proposal for the Dudding Hill railway line pedestrian/cycle bridge?

Question 23: Would the WAAP fail to accord with policy 6.7 'Setter street and surface transport' of the London Plan without these changes, and how?

Issue 6: Event Related Transport (Policy WEM 17)/Wembley Stadium access and egress; Wembley Hill Road/Empire Way junction; coach parking:

The Football Association Group (Wembley Stadium) seeks changes to the text of the WAAP and policy WEM17, Event Related Transport, to include prioritising the use of the Forty Hill and Blackbird Hill route to the North Circular Road.

Question 24: Does this differ from the route which is prioritised at present, and if so why?

Question 25: Would this change be realistic?

Question 26: Why does the FA seek a return to the Three Corridor Strategy? Would these be realistic? What advantages and disadvantages would this have?

Question 27: Why does the FA seek a revised priority for the Western Highway Corridor and the re-instatement of the previous traffic capacity at the Wembley Hill Road roundabout junction with Empire Way?

Question 28: Why is this not included in the WAAP – what would be the practicalities, advantages and disadvantages of this requested change?

Question 29: How would the proposed change improve the effectiveness of the WAAP?

Question 30: Is the enforcement of unauthorised match day parking a matter for the WAAP, and why? How could it be included within the plan effectively?

Question 31: How would the Council's proposed focussed change for Site Proposal W19 affect coach parking for event days?

Question 32: What specific change to the WAAP does the FA seek in relation to the cycleway proposals along the Stadium Access Corridor, and why is this necessary to make the plan sound?

Issue 7: Land take map 20.5/ Proposal W27 Euro Car Parts; Land take map 20.4/Proposal W28 First Way:

Site Proposal W27, Euro Car Parts, requires land for junction improvement at Fulton Road/Fifth Way/Engineers Way, with options on maps 20.4 and 20.5. UKI (Wembley) Ltd submits that this has been superseded by a subsequent planning permission and that the WAAP is, therefore, unsound.

Question 33: Is there an outstanding land requirement for junction improvement?

Question 34: Is any discrepancy between any remaining requirement at this site and/or the planning permission so different from the WAAP maps that the plan is unsound?

Site Proposal W28 First Way makes provision for short stretches of land to be acquired to enable two way traffic to be introduced on South Way/First Way. UKI (Wembley) submits that the WAAP is unsound since planning permission Ref 12/1293 precludes the land take shown on Map 20.4.

Question 35: Following the grant of the above planning permission is any land required from this site for highway purposes?

Question 36: What is the extent of the alleged error on Map 20.4 – does it render the WAAP unsound, and why?

Issue 8: Shared spaces:

The Guide Dogs for the Blind submit that the WAAP is unsound since spaces shared between pedestrians, motor vehicles and cyclists – as described in paragraph 6.39 and set out in policy WEM16, Walking and Cycling, would not be effective for blind and partially sighted people. The organisation seeks kerbs, crossing points and signage to help people to understand how to use the space.

Question 37: What is the definition of a low trafficked area?

Question 38: Would kerbs, crossing points and appropriate signage be compatible with shared spaces for pedestrians and cyclists, and if so, is this precluded or supported by policy WEM16?

Question 39: would policy WEm16 be effective in providing shared spaces which would be compatible with the needs of blind and partially sighted people?

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Session 3: Tuesday 4 March 2014, starting at 2.00 pm

Invitations to participate; Inspector, Council, GLA, Quintain

Issue 9: Tall Buildings, policy WEM5:

The Greater London Authority requests that additional text be added to policy WEM5, Tall Buildings, to require additional urban design analysis as set out in London Plan policy 7.7.

Question 40: Why is this necessary, as no conflict between the policies has been alleged?

The Council proposes a change to Map 4.4 to include the area covered by Site Proposal W18 to be appropriate for Tall Buildings rather than as being Site Sensitive to Tall Buildings. It explains that this would correct an error made following the changes agreed in response to representations at the Preferred Options stage of the WAAP.

Question 41: Would the Council direct me to its relevant decision following the Preferred Options Stage in the evidence base, or elsewhere?

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Session 4: Wednesday 5 March 2014, starting at 10.00 am

Matter: Town centres, the Strategic Cultural Area and shopping

Invitations to participate: Inspector, Council, GLA; Maddox Associates for Solum Regeneration, CgMs for Costco

Issues:

Issue 10: Town Centre boundaries

In response to the needs identified in the Brent Retail Needs and Capacity Study, 2008, and the lack of available sites in Kilburn the Core Strategy identifies Wembley for additional retail growth. As submitted, the WAAP proposes the expansion of Wembley Town Centre, and an extension to the Town Centre boundary to include land between Wembley Park and Ealing Road, as shown on Maps 2.1, 8.1, 21.1 and 21.2.

The Greater London Authority considers that separate designation continues to be necessary for the Wembley Park District Centre and Wembley Town Centre in order to conform to the London Plan.

The Council proposes a focused change to the Town Centre boundaries and consequential focused changes and clarification to the supporting text of the WAAP. The Council has stated that it wishes these focused changes to be Main Modifications to the plan.

Question 42: Would the proposed focused change achieve the conformity to the London Plan sought by the GLA?

Question 43: What would the impact of the focused change be on the scale and development which will be permitted in the Wembley Park area?

In particular, will it affect the mix of development within Site Proposal W12, North West Lands?

Question 44: If so, what impact would there be on the extent of housing provision and the anticipated employment generation from the other uses?

Question 45: Would any such changes impact on the soundness of the WAAP in relation to its target to increase newly approved retail floorspace by 25% and provide 10,000 additional full time jobs by 2031?

Issue 11: Strategic Cultural Area

Policy WEM25 provides a framework for the development of the Wembley Strategic Cultural Area. Quintain requests a change to the policy wording.

Question 46: Since the representor does not submit that the WAAP is unsound with regard to policy WEM25, why is the proposed change suggested, and is it necessary?

Issue 12: Food store location:

Policy WEM24 directs large food stores over 2,000sqm gross to sites within or adjoining Wembley High Road. Site Proposal W5 proposes a medium sized food store (approximately 6,000sqm with associated parking at Copland House and Brent House.

Representor Solum Regeneration seeks the deletion of the reference to a food store in Site Proposal W5 on the basis that there is uncertainty regarding the availability of the site. It further maintains that submits that the WAAP is not legally compliant and is unsound with regard to Site Proposal W4, and seeks the deletion of Site Proposals W3 and W4. The representor proposes that provision is made for a food store at High Road/Chiltern Line Cutting (sites W3 and W4), with a consequent reduction in housing provision to 350 units for the combined site.

Question 47: Solum Regeneration refers to the possibility of a food store within the Quintain development, and its impact on the likelihood of a food store being developed at the Copeland School/Brent House site. Do proposals for such a development exist, and if so, whereabouts?

Question 48: Is there evidence to demonstrate its impact on food retailing at Site Proposal W5?

Question 49: Is the delivery of a food store at Site W5 realistic and justified within the plan period?

Question 50: Is the development of a food store at site W4 precluded by the WAAP policy WEM24 or Site Proposal W4?

Question 51: To what extent, if any, would the development of a food store at Site W4 be constrained by its partial location within a Local Flood Risk Zone and the mitigation measures identified in the Brent Surface Water Management Plan?

Question 52: Is there evidence to support Solum Regeneration's submission that the development of a food store at the Copeland School/Brent House site would dilute the WAAP aspiration to maintain an active retail frontage along the northern part of Wembley High Road?

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Session 5: Wednesday 5 March 2014, starting at 2.00 pm

Matter: Response to Climate Change

Invitations to participate: Inspector, Council, CgMs for Costco, Thames Water, Quintain

Issues:

Issue 13: Decentralised Energy (Policy WEM30):

Costco has requested a change to paragraph 10.8 of the WAAP, to inset 'where appropriate', in the penultimate sentence.

Question 53: Clarify the precise wording sought.

Question 54: Does policy WEM30 include sufficient flexibility to allow for heating and air handling systems which are not compatible with decentralised networks in situations where this would be more energy efficient?

Question 55: Is the introduction of the words 'where appropriate' necessary for the WAAP's soundness, and would it maintain the effectiveness of policy WEM30 and its conformity to the London Plan?

Issue 14: Contributions towards Urban Greening (Policy WEM32):

Representor Quintain requests a change to the wording of policy WEM32 as it considers there are circumstances where urban greening measures are not required.

The proposed change would 'strongly encourage' rather than require urban greening measures and change the requirement for financial contributions to 'may be required.'

Question 56: Does policy WEM32 allow sufficient flexibility for situations where urban greening is not required?

Question 57: Are the proposed changes necessary to make the plan sound, and how would they impact on the effectiveness of policy WEM32?

Issue 15: Flood Risk Assessments and Sustainable Urban Drainage Systems (Policy WEM33):

The Environment Agency has requested changes to Policy WEM33 to better reflect Government policy in the National Planning Policy Framework (Framework), and to the supporting text. The Environment Agency will rely on its written representations, but these questions remain:

Question 58: Is there any reason not to insert into policy WEM33 the requirement for planning applications on sites which are over 1 hectare in flood zone 1 to be accompanied by a flood risk assessment?

Question 59: Is there any objection to adding the words 'and improve water quality' at the end of the penultimate paragraph of policy WEM33?

Question 60: Would such a change be necessary for the WAAP to be sound?

Question 61: Would it improve the consistency between WAAP and the Framework?

Question 62: Would this change require consequential changes to other policies and/or Site Proposals within the WAAP?

Question 63: If not, would this increase the consistency of the WAAP with the Framework?

Matter: Open Space, Sports & Wildlife:

Invitations to participate: Inspector, Council, Quintain, Maddox Associates for Solum Regeneration

Issues:

Issue 16: Open space – the orientation of space at Site W18:

Quintain requests the deletion of the words 'orientated east to west' in policy WEM34 as they relate to the proposal for a new park adjacent to Engineers Way

Question 64: What is the rationale for the specified orientation?

Question 65: What harm would arise from a different orientation?

Question 66: Is this change necessary for the AAP to be sound?

Issue 17: The size of pocket parks

Quintain requests the deletion of the specified size of .4ha for pocket on the basis that they are not this size.

Question 67: What is the origin and importance of this size? Is it a minimum standard, and if so, what is its derivation? It is necessary for the effectiveness of the AAP?

Issue 18: The proposed walkway in Chiltern Cutting North Site (W3):

Solum Regeneration submits that to be of value for public access and to generate funding for ecological planting and maintenance work the site should be developed in tandem with Site Proposal W4.

Question 68: Why could public access to Site W3 not be provided independently from Site W4 since the sites are separated by the railway line?

Question 69: Would the WAAP be unsound in the absence of this change?

Issue 19: Food growing

Solum Regeneration's representation on open space provision refers to policy WEM 36, but this policy relates to Food Growing.

Question 70: Does Solum Regeneration seek a change to the Food growing policy, or is there an error relating to the policy numbering?

Issue 20: Sports Facilities/Open Space Improvements:

Solum Regeneration submits that a new woodland walk along Chiltern Embankments would not be deliverable without its scheme for site W3 and W4 for financial reasons. However, the submission refers to policy WEM37 – which is not an open space improvement policy, but the Sports Facilities policy, and which I take to be an error.

Question 71: Does Solum Regeneration seek a change to the Sports facilities policy, or is there an error in the policy reference?

Question 72: If the new woodland walk along the Chiltern Embankments could not be delivered, would the WAAP be unsound?

C A Newmarch
20 February 2014