
Christine Newmarch
The Planning Inspectorate

8 August 2013

Dear Ms Newmarch

WEMBLEY AREA ACTION PLAN EXAMINATION

Please find attached Brent Council's responses to the questions set out in your letter of 25 July 2013. The Council's responses are in red and are set out under each of the questions.

Officers of the council are liaising with the Programme Officer, Chris Banks and matters such as accommodation for potential hearing sessions are being addressed. Chris Banks is contacting representors to determine whether or not they wish to speak in person.

Please get back to me should you need further information or documents.

I look forward to hearing from you.

Yours sincerely



Ken Hullock
Head of Planning & Transport Strategy

Examination of the Wembley Area Action Plan

Brent Response to Inspector's Questions in Letter1, 25th July 2013

Brent response in red.

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?

This strengthens the case for the plan. London Plan policy 2.13 states the Mayor will encourage and support partnerships preparing opportunity area planning frameworks to realise these areas growth potential.

The Core Strategy establishes high level strategic policy for the growth area and makes clear the Council's intention to review and consolidate detailed policy and guidance for the Wembley area into an Area Action Plan.

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?

The AAP includes chapters on Social Infrastructure, Climate Change, open space, sport and wildlife to ensure the AAP contributes to the achievement of sustainable development as required by the NPPF. The NPPF also states local planning authorities should adopt proactive strategies to mitigate climate change, taking full account of flood risk and support the move to a low carbon future.

In addition to the requirements of the NPPF the London Plan policies and evidence which justify each policy is listed below. Detailed justification is included in the relevant chapter of the WAAP, and a hard copy of the evidence base has been provided.

- WEM 29 Community Facilities - the Brent Infrastructure and Investment Framework and London Plan policies 3.16, 3.17 and 3.18. In addition the GLA are in support of the policy and believe it to be sound.
- WEM 30 Decentralised Energy - London Plan policy 5.5, Brent Sustainable Energy Infrastructure: Wembley Feasibility Study (Arup, 2008) and the Mayor's Climate Change Mitigation and Energy Strategy (2011).
- WEM 31 Energy from Waste - London Plan and the Mayor's Climate Change Mitigation and Energy Strategy (2011).
- WEM 32 Urban Greening - London Plan policy 5.10 and the Mayor's Climate Change Mitigation and Energy Strategy (2011). In addition the Environment Agency is in support of the policy and believe it to be sound.
- WEM33 Flood Risk – WAAP Floodrisk Analysis for Site Proposals (2012), Brent Surface Water Management Plan (2011), Brent Strategic Flood Risk Assessment Level 1 (2007), Brent Strategic Flood Risk Assessment Level 2: Wembley Masterplan (2008), and the Mayor's Climate Change Mitigation and Energy Strategy (2011). In addition the GLA, Environment Agency and Thames Water are in support of the policy and believe it to be sound.
- WEM 36 Food Growing – Brent Open Space Report (2009).
- WEM 39 Access to Nature – London's Natural Signatures (2011) and Brent Open Space Report (2009). In addition the Environment Agency is in support of the policy and believe it to be sound.
- WEM 40 River Brent and Wealdstone Brook – Thames River Basin Management Plan (2009) and London Rivers Action Plan (2009). In addition the GLA and Environment Agency are in support of the policy and believe it to be sound.

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

The title Area Action Plan is still appropriate as the plan provides detailed policy and guidance for the Wembley area. Paragraphs 1.1 to 1.3 of the Area Action Plan explain how the AAP relates to other elements of the 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?

The Preferred Options WAAP was prepared and underwent consultation post publication of the NPPF. Reference is made throughout the WAAP to relevant requirements of the NPPF, therefore it was not felt necessary to produce a separate document stating how the AAP complies.

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?

A schedule setting out which allocations in the Site Specific Allocations DPD will be superseded by new site proposals in the AAP is included in appendix A of the WAAP.

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?

The Council has not received any objections relating to the duty to cooperate.

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 LDF CS Housing Trajectory assumes 1030 re-occupied vacant homes over the period 2007-2016 at a rate of 103 per annum. This is a whole borough figure and the LDF CS makes no assumptions with respect to spatial distribution.

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 LDF CS minimum target of 11,500 homes in Wembley over the period 2007-26 is for new homes and excludes re-occupied vacant homes.

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?

The total indicative residential capacity in the AAP is 8,909 units. In addition discussions are continuing with Quintain as to the appropriate potential capacity for the Wembley Stadium Car Park site (W12) which currently has outline permission for 1,500 units.

The Core Strategy identified capacity for 11,500 new homes in Wembley Growth Area. As the table below indicates schemes completed since the adoption of the Core Strategy have delivered 1,078 units in Wembley. The completed schemes, indicative development capacity in the WAAP and permission on site W12 total 11,793 units. This is an additional 293 units to the identified capacity in the Core Strategy.

Site Name	WAAP Site	Planning	Indicative or	Completed
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		Application No.	Planning Permission Capacity	
Wembley West End	W1		250	
London Road	W2		50	
Central Station		03/3765		223
Chiltern Line Cutting North	W3		15	
High Road/Chiltern Line Cutting South (incl. Chesterfield House)	W4		890	
Copland School/Brent House	W5		370	
Elizabeth House		09/2506	115	
South Way Site	W6	04/0379	341	
Mahatma Ghandi House	W7		76	
W01 (Forum House)		05/2949		286
W04 (Quadrant Court)		06/3630		234
Land West of Wembley Stadium	W8	47/4877	1,500	
York House	W9		60	
Dexion House	W10		129	
Ada Lewis House				84
Malcolm House	W11	08/2633	62	
NW Lands	W12	10/3032	1,300	
Stadium Retail Park	W13		50	
Apex/Karma House	W15	05/0626	85	
Shubette House		08/3009	158	
Olympic Way Offices	W17		250	
Wembley Retail Park	W18		500	
Wembley Stadium Car Park	W19		1,500	
Cottrell House	W20		55	
21-31 Brook Avenue	W21		160	
29,30,31 Brook Avenue		10/2814	33	
Wembley Park Station Car Park	W22		100	
The Torch/Kwik Fit	W23		100	
Town Hall	W24		156	
Amex House	W25		150	
Watkin Road	W26		400	
Euro Car Parts	W27		360	
First Way	W28		1,500	
32-34 Brook Avenue		09/2571		41
Elm Road		03/3727		121

Rosemead Avenue		11/1030		23
Wembley Mini Market		10/0646		21
492-498 & Car Park R/O 492-500, High Road		07/3058		45
Total			10,715	1078

The Site Specific Allocations DPD identified an indicative development capacity of 3,300 units for sites within Wembley Growth Area. A schedule setting out which allocations will be superseded by new site proposals in the AAP is included in appendix A of the WAAP. This table has been reproduced below.

Site Specific Allocations DPD, July 2011. Allocations Superseded	Superseded by Wembley Area Action Plan Policy/Proposal
W1 Wembley West End	W1 Wembley West End
W3 Brent Town Hall	W24 Town Hall
W4 Shubette House/Karma House/Apex House	W15 Apex House & Karma House
W5 Wembley Eastern Lands	W28 First Way
W6 Amex House	W25 Amex House
W7 Chesterfield House	W4 High Road/ Chiltern Line Cutting South
W8 Brent House and Elizabeth House	W5 Copland School & Brent House
W9 Wembley High Road	W4 High Road / Chiltern Line Cutting South
W10 Wembley Chiltern Embankments	W3 Chiltern Line Cutting North

The Site Specific Allocations DPD also includes an allocation of 16 units on the former Wembley Mini-Market (site W11). Permission was granted for 28 units in 2010 and the scheme is now complete therefore this was not taken forward in the WAAP.

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?

As indicated in the table below this figure includes extant planning permissions for residential units granted since the beginning of the Core Strategy period. It does not include the 1,078 units granted planning permission and completed since the beginning of the Core Strategy period.

Site no.	Site Name	Indicative or Planning Permission Capacity	Planning permission
W1	Wembley West End	250	
W2	London Road	50	
W3	Chiltern Line Cutting North	15	
W4	High Road/Chiltern Line Cutting South (incl. Chesterfield)	890	

	House)		
W5	Copland School/Brent House	370	
W6	South Way Site	341	Outline planning permission granted in 2004 04/0379
W7	Mahatma Ghandi House	76	
W8	Land West of Wembley Stadium	1,500	Outline planning permission granted in 2004 03/3200
W9	York House	60	
W10	Dexion House	129	
W11	Malcolm House	62	
W12	North West Lands	1,300*	Outline planning permission granted in 2011 10/3032
W13	Stadium Retail Park	50	
W14	Arena House and Crescent House	-	
W15	Apex House & Karma House	85	
W16	1 Olympic Way	-	
W17	Olympic Way Offices	250	
W18	Wembley Retail Park	500	
W19	Wembley Stadium Car Park	Discussions are continuing with Quintain as to the appropriate potential capacity for the Wembley Stadium Car Park site which currently has outline permission for 1,500 units.	Outline planning permission granted in 2004 03/3200
W20	Cottrell House	55	
W21	21-31 Brook Avenue	160	Planning permission granted in 2011 10/2814
W22	Wembley Park Station Car Park	100	
W23	The Torch/Kwik Fit	100	
W24	Town Hall	156	
W25	Amex House	150	
W26	Watkin Road	400	
W27	Euro Car Parts	360	

W28	First Way	1,500	
W29	Second Way	-	
W30	Drury Way	-	
W31	Great Central Way	-	
Total		8,909	

*Proposed to increase figure from 815 to 1,300 as a focussed change

Brent's current supply of specific deliverable sites is sufficient to provide 8.4 years worth of housing against our housing requirements. This includes an additional 5% buffer to ensure choice and competition in the market for land. This has been calculated taking into account extant and live planning permissions, sites identified in the Site Specific Allocations DPD and WAAP, and windfall sites (figure supplied by Greater London Authority). Due to the scale of regeneration in Wembley the majority of sites will not come forward within the 5 year period, therefore Wembley makes a relatively small contribution to the 5 year housing requirement.

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

The Council has not undertaken a Brent-specific Strategic Housing Market Assessment. However, together with other West London boroughs, a West London Strategic Housing Market Assessment has been produced.

The West London Strategic Housing Market Assessment (6.26-6.34) identifies that a net 35,924 additional dwellings should be provided in West London over a 5 year period to sustain the existing supply/demand imbalance. The WAAP site proposals identify additional valuable capacity of 293 homes, beyond the sites detailed in the LDF CS and SSA, which can help deliver against this requirement. The SHMA has also informed the housing mix as set out in the response to question 13.

The sites identified in the WAAP have fed into the London-wide Strategic Housing Land Availability Assessment being undertaken currently by the GLA with input from all London boroughs including Brent.

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?

The BNP Paribas Affordable Housing and Community Infrastructure Levy Viability Studies undertaken in 2009 and 2012 to support the Council's LDF CS and CIL Charging Schedule, demonstrate the general viability of residential and mixed use schemes across different development scenarios in the borough, and allow for affordable housing planning obligations, infrastructure contributions, as well as standard assumptions surrounding build costs, sales values, land prices, developer profit, etc.

Almost all of WAAP sites are in private ownership and their development is reliant upon the private sector bringing forward development. However, their current uses – industrial or former industrial sites, car parking, office and retail – fit within the land use categories of uses tested under the Viability Studies and whose redevelopment has been shown to be broadly viable.

Most of the WAAP sites are expected to come forward in the medium or longer terms and, as such, a broad brush view on viability is considered appropriate given the changing market conditions, including house price inflation, which will be observed over the period.

Notwithstanding this, it should be noted that first phases of the mixed use development of Quintain Estates and Development's (QED) Stage 1 planning permission have completed on commercial sites in Wembley, delivering new mixed use development including residential, student accommodation, hotel and retail uses. Other large mixed use schemes have recently completed on Shubette House and Elizabeth House. Moreover, a financial appraisal was submitted for QED's recently permitted North West Lands planning permission, which demonstrates viable dense mixed use regeneration of a large low grade warehousing site. It is not considered necessary, in light of the above, to undertake a detailed feasibility or viability study for each individual 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?

The proposed WAAP unit size mix guidance in table 7.1 provides indicative proportions for the different areas in Wembley in line with the Wembley Masterplan SPD.

- NW / First Way – higher, more dense, more mixed use
- NE – lower, less dense, less mixed use

The proportion of larger social rent units follows the proportions set out in the West London Affordable Housing Requirement, but recognises the practical difficulty of providing such a high proportion of social rented 4 bed+ units in the AAP area. Allowance for more three and less four bedroom units reflects the greater proportion of higher density flatted and mixed use development which is appropriate for, and expected to be delivered in, the Wembley area.

Intermediate and market sale housing units size/mix guidance allows for lower proportions of family housing due to the lower relative demand for such accommodation (e.g. London Plan para 3.47; West London SHMA Figure 92).

As shown in the response to the following question the mix is consistent with the London Plan density matrix.

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?

The WAAP sites indicative development capacities have, where available, been based on extant planning permissions or adopted planning guidance (specifically the adopted SSA and Wembley Link SPD).

Where no planning permission has been granted or guidance issued, the Council has followed the method used in the adopted SSA and calculated indicative capacities by reference to the site PTALs and relevant units per hectare mid points from the London Plan density matrix; for a couple of cases, adjustments have been made to account for site specific constraints.

The table below breaks down how the WAAP indicative site capacities have been calculated. The use of the London Plan density matrix (directly or through the SSA) is the predominant method of calculation:

WAAP Site No.	Method	Total WAAP Sites	%
W2, W6, W7, W15, W18, W20, W21, W23, W26, W27	London Plan Density Matrix	10	43%
W1, W24, W25, W28	SSA	4	17%
W8, W12, W17, W22	Planning Permission	4	17%
W3, W4, W5	SSA & Wembley Link SPD	3	13%
W9, W13	Bespoke Calculation	2	9%

23

In the lack of more precise site specific guidance, the use of London Plan Density Matrix unit per hectare mid points to calculate indicative capacities is a recognised method to estimate sustainable residential quantum and consistent with the approach taken in the adopted SSA.

Applying the WAAP indicative unit size mix (WAAP table 7.1) to the London Plan Density Matrix unit per hectare mid points shows that this method generates indicative site capacities that can also reasonably contain the proportions of family housing detailed.

The tables below demonstrate that when accounting for the consequential number of habitable rooms, including the larger number of habitable rooms associated with family sized accommodation implied by the WAAP indicative unit size mix, the relevant London Plan habitable rooms per hectare thresholds can be accommodated in both the North West & First Way and North East Districts, and that, therefore, the WAAP indicative development capacities and indicative unit size mix are compatible.

London Plan Density Matrix

Central (within 800 metres of a Metropolitan or Major Town Centre)

PTAL 4 to 6

Mid Point u/ha 265

Range hr/ha 650-1100

1 hectare Site 265 units

50% affordable housing scheme in line with LDF CS CP2 target

70:30 affordable rent to intermediate affordable housing ratio as per LDF CS 5.93

(NB: decimal points in the tables below are rounded)

North West & First Way District WAAP Mix

50% 35% 15%

Market Social / Affordable Rent Intermediate

	Market	Social / Affordable Rent	Intermediate
1 bed	30%	15%	45%
2 bed	55%	35%	45%
3 bed	15%	45%	10%
4 bed	0%	5%	0%
	100%	100%	100%

Units

1 bed	40	14	18
2 bed	73	32	18
3 bed	20	42	4
4 bed	0	5	0
	133	93	40

265 units

Habitable Rooms

2 hab rooms	80	28	36
3 hab rooms	219	97	54
5 hab rooms	99	209	20
6 hab rooms	0	28	0
	398	362	109

869 habitable rooms

North East District WAAP Mix

50% 35% 15%

Market Social / Affordable Rent Intermediate

	Market	Social / Affordable Rent	Intermediate
1 bed	30%	10%	40%
2 bed	45%	40%	40%
3 bed	25%	40%	20%
4 bed	0%	10%	0%
	100%	100%	100%

Units

1 bed	40	9	16
2 bed	60	37	16
3 bed	33	37	8
4 bed	0	9	0
	133	93	40

265 units

Habitable Rooms

2 hab rooms	80	19	32
3 hab rooms	179	111	48
5 hab rooms	166	186	40
6 hab rooms	0	56	0
	424	371	119

914 habitable rooms

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?

The Draft London Housing Strategy (February 2010) set a target under Policy 1.1C that 42% of social rented homes have three bedrooms or more. However, the Revised London Housing Strategy (December 2011) withdrew this target. The Revised London Housing Strategy does refer to the Mayor's long term aim for half of affordable homes to be family-sized, and the WAAP supports this aim by indicating that half of new social and affordable rented homes in Wembley should be family-sized and have three bedrooms or more.

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

The WAAP proposes that the maximum reasonable amount of affordable housing be sought in new developments in Wembley, in accordance with London Plan policies 3.11 and 3.12 and subject to viability and the achievement of other planning objectives.

The WAAP unit size mix guidance in table 7.1 both assumes a 60:40 tenure split between affordable rented and intermediate housing and provides for priority for larger family housing, in accordance with London Plan policy 3.11.

This is in keeping with the NPPF requirement for Local Plans to meet the need for affordable housing in the housing market area, whilst ensuring the viability of development is not threatened.

The Council proposes a focussed change to policy WEM18.

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

No. Policy WEM 18 allows for new affordable rented housing as part of the affordable housing mix but, in line with the NPPF definition, specifically requires that new affordable rented housing meets the needs of households eligible for social housing, with eligibility determined with regard to local incomes and local house prices.

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?

WEM 18 seeks to encourage new intermediate housing products, and explicitly discounted market sale products. WEM 18 specifically states future equity payments associated with such products must be recycled into new affordable housing, and therefore that such products must meet the broader NPPF affordable housing definition.

Issue 2.4 – Student accommodation

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

So far, new residential accommodation built out in Wembley since 2007 comprises 1086 conventional homes and 1095 student bedrooms. In applying an occupancy rate of 2.3 per new conventional housing unit (used as the basis for estimating population growth in Wembley for the Core Strategy), this means that to date about 30% of the new population are students. It is considered that this is an unsustainable proportion going forward and that there should be an overall limit on the level of students in the overall population.

The 'cap' of 20% of projected new population in policy WEM23, above which no further student accommodation will be permitted, is appropriate as it is a generous figure when considered against the objectives for, and the needs to be met within, the area. It takes into account the likely proportion of the local population growth that would be students given existing planning consents (about 10%) and was framed in the knowledge that there continues to be demand for the provision of further purpose built student accommodation. It also drew upon information supplied in a study of student accommodation undertaken on behalf of the council by Worcester Polytechnic Institute (WPI) students (Supporting document no. W5.1). Whilst this study concluded that identifying saturation levels for students in the total population is a subjective judgement, it referred to draft planning policy produced by Canterbury Council which seeks to limit the number of housing units in an area in multiple occupation to 20% based upon a judgement that 20% of the local population being students was a reasonable limit.

Additionally, in assessing the potential of the Site Proposals in the WAAP, it is considered that the provision of a mix of uses incorporating purpose-built student accommodation could be accommodated in only a few additional sites without impacting on the ability of sites to deliver the conventional housing development necessary to meet targets for Wembley set out in the Core Strategy. It is likely that this point will be reached below the level proposed to be set as a cap, so the limit of 20% should be viewed as a back-up position should it be difficult to judge whether or not particular proposals are going to undermine the Council's ability to bring forward sufficient conventional housing to help meet the identified need as set out in the Core Strategy.

The WPI study emphasises that assessing at which point an overconcentration of students in an area is reached is a subjective judgement. There is no hard evidence about when such a point is reached but there is a general view widely held that high concentrations are harmful and undermine the objective of achieving mixed and balanced communities. The Council is keen to promote a relatively high proportion of students as part of the mix in the Wembley area but, given the particular advantages and therefore attraction of Wembley for the provision of student accommodation, and given the evidence available, the Council holds the view that a maximum of 20% of the projected new population to be students is a reasonable limit to aim for in policy.

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

See reference to WPI student study in answer to question 19.

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

If extant consents remain exist that together with a new proposal would take the student population above 20% of the projected total population then any application for student accommodation would be refused.

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?

As stated in paragraph 7.35 of the WAAP, Brent's entire current provision of accommodation for nomadic peoples is on the existing Lynton Close traveller site. Whilst there is an identified need for additional pitches in Brent, an increase in the provision of accommodation for nomadic people locally would be considered an over-concentration of such accommodation within the Wembley area. The site at Lynton Close constitutes over 10% of London's supply of traveller pitches. It is appropriate that consideration of where additional pitches can be accommodated is undertaken as part of a borough-wide review of potential sites rather than as part of the Area Action Plan.

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

As stated in paragraph 5.84 of the Core Strategy, the need for further pitches will be addressed in the emerging Development Management Policies DPD which it is intended will be brought forward for public consultation in 2014. This DPD may be further informed by a potential sub-regional (West London) accommodation strategy which would better reconcile current provision, projected future needs and potential capacities.

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

Government planning policy aims to increase the number of traveller sites in appropriate locations, to address under provision and maintain an appropriate level of supply. In identifying sites, consideration is to be given to the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers.

It is considered an appropriate supply already exists in the Wembley area. Any further expansion at Lynton Close would extent the site into Strategic Industrial Locations (SIL). Under London Plan policy 2.17, SIL are protected and promoted as main reservoirs of industrial capacity and related activities such as logistics, waste management and utilities. Due to the nature of SIL it would not provide an acceptable environmental quality for a traveller site.

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

As explained above, it is considered appropriate to address the need for additional pitches for travellers on a borough-wide basis and therefore it is inappropriate to make a borough-wide assessment through the Area Action Plan. The approach taken in the WAAP is, therefore, consistent with national policy and is considered sound.

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?

This matter has been considered within the two Quintain Outline Planning Consents which granted consent for approximately 5,000 homes within the Wembley Growth Area, resulting in a number of design measures to address potential impacts of Stadium and Arena events and crowds. All homes must be designed so that they meet the relevant standards for noise, taking into account noise from Wembley Stadium events (including concerts) which noise assessments have demonstrated represent the maximum noise levels likely to be experienced in the area. Routes that will be used for vehicles or pedestrians attending events have commercial uses on the lower floors, rather than residential units, to ensure a satisfactory environment. A hierarchy of amenity spaces is also required, including private spaces (balconies and terraces), communal spaces that are not publicly accessible together with new public open spaces to ensure that residents have access to good quality outdoor space at all times. These are just some of the design measures that have been incorporated within existing consents.

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

The primary factor that potentially affects the quality of family housing within high density town centre developments is the provision of amenity / open space. The scale of development should vary within this site, with higher, more dense development on the High Road frontage and lower, less dense development toward the southern end of the site given the surrounding suburban context to the rear. This helps to facilitate the provision of greater proportions of family housing. Large retail units and the associated car park may allow the provision of rooftop terrace amenity space.

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?

The change is proposed to ensure the WAAP complies with London Plan policy 2.15 which states changes to the town centre network should be co-ordinated strategically in the context of map 2.6 and annex 2 of the plan. The Council does not feel this amendment will impact on the delivery of the AAP or the realisation of its objectives.

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?

It has long been recognised, based upon health check data, that Wembley Town Centre experienced significant decline over a long period. Paragraph 8.7 of the AAP demonstrates the fall in ranking of the centre. Whilst the strategy for Wembley Town Centre, as set out in Brent's Core Strategy, as well as the UDP adopted in 2004, is for it to be regenerated and to expand eastwards, it is important that this is implemented in such a way that any harmful impact is minimised and that new retail development to the east is linked with the traditional town centre based on the High Road. The policy to direct a new major food store to the High Road is carried forward from the UDP 2004 (Policy WEM3). The rationale of maintaining the High Road's role of meeting local needs set out in paragraph 14.6.5 of the UDP still applies and is reflected in paragraph 8.16 of the AAP.

It is Brent's view that maintaining the role of the High Road in meeting local need is a key element of the strategy for the development of the centre and, therefore, any change which further weakens policy for maintaining the role of the High Road would harm the soundness of the Plan.

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?

It is the Council's view, based upon the Retail Need and Capacity Study 2008 conclusions that there is scope for two additional medium-sized food stores within the borough, that only one store can be brought forward at Wembley without impacting upon other centres. Policy WEM24 does not specify a particular site as the location of a new store but states that a new store should be "...within or adjoining Wembley High Road". The Council considers that Site Proposal W5 is the most appropriate site for a new food store within the centre because it would significantly enhance a link between the High Road and new development to the east. However, it is recognised, for example, that the Wembley West End site (W1) is also capable of accommodating a food store which would benefit the existing town centre. The site for a food store proposed by Solum Regeneration (across sites W3 and W4), although it also meets the policy requirement of adjoining the High Road, is not considered as an appropriate site, partly because it would not enhance the link between the High Road and the expanded town centre to the East, but also because it would conflict with existing policy in the London Plan (policy 7.19) and Brent's UDP (policy OS12) on nature conservation as it would require the substantial development of an area designated as a Site of Borough (Grade1) Nature Conservation Importance.

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.

It is the intention that the borough's existing Proposals Map 2011 be amended to include the Strategic Cultural Area. This will be called a Policies Map when it is published with the proposed changes as agreed through the Area Action Plan.

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?

To inform the review of policy in the Wembley Area Action Plan, further surveys of the Wembley and Neasden SILs were undertaken in early 2012. When taken together, the Wembley / Neasden SIL has shown a 25% increase in vacancy levels between 2006 and 2010 so that it now makes up 17% of the land area. Vacancy levels are higher (28%) in the Wembley part of the SIL to the west of the area, i.e. furthest from the North Circular Road. The land proposed to be de-designated in the Area Action Plan comprises two sites totalling 2.4 hectares. One of the sites on South Way (1.2 hectares) is in use as a car park for Wembley Stadium on event days whilst the other is a warehouse, Euro Car Parts, on Fulton Road and an adjacent vacant plot. This site is also 1.2 hectares.

The de-designation of both sites is desirable because a more regular boundary with the main regeneration area to the west can be achieved. This will help to minimise the potential impact of industrial or related uses on the regeneration area where a mix of uses, including residential, is being developed and promoted. In particular, the site opposite Euro Car Parts on Fulton Road has been acquired for the development of a Primary School in the future to meet the demand for school places as the local population increases. It is important that the local environment is improved for the school to be brought forward.

Question 33: What implications does this have for employment?

Any implications for employment will be small scale and short term as there is an identified need to release employment land in the borough. The GLA Land for Industry and Transport SPG (2012) suggests that demand for industrial land in Brent is likely to be negative in the period to 2031 (at -26 ha or -1.3ha per annum). The SIL proposed for release provides limited employment opportunities. The majority of the site is vacant or in use as a car park. Euro Car Parts warehouse can be accommodated on vacant land elsewhere in the remaining SIL.

In 2013 the Council appointed consultants URS to update the 2009 Employment Land Study. This study supports the findings of the Land for Industry and Transport SPG. After taking account of vacant and developable industrial land, the need to retain an appropriate 'buffer' or vacant land to allow the market to function effectively (frictional vacancy) and demand for additional land required for waste and recycling facilities it is estimated that net demand to 2029 will be between -23.7ha and -17.4ha of industrial land; that is

industrial land that can be released for other uses. The medium scenario, which is considered the most likely scenario and therefore forms the basis of the policy recommendations, is approximately -20.6 ha or -1.3ha p.a. The study recommends the release of 2.4 ha of SIL at Wembley.

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

This complies with the NPPF which states planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose (as evidenced by demand studies) and London Plan policy 4.4 which states local planning authorities should seek to release industrial land where there is proven to be a surplus of supply to meet forecast demand.

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?

The Council has proposed to make reference to education as a minor change for clarification. As stated policy W 24 allows for community uses which include education.

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

The Town Hall brief identifies appropriate uses as including an academic institution.

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?

The justification for each scheme is largely contained within these two documents. Essentially, the schemes have been developed for those junctions which come under pressure from future development. The schemes are designed to mitigate the impact of this new development as well as possible.

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

The junction improvements have been developed with the knowledge of the wider network performance illustrated within the Wembley Masterplan Transport Review which maps the

performance of junctions one to another along key links. To deliver the quantum of development in the WAAP in its entirety, all junction improvements will be required. The phasing of junction improvements will be dependant on when development comes forward.

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?

The sequence of delivery of schemes is not critical for highway safety and efficiency. We are developing a prioritisation matrix for schemes which is based on identifying trigger points of when certain schemes would be needed to support specific developments. The contributions from specific developments will go towards these improvements and, as the contributions are collected as the developments come forward, it means that the transport infrastructure can be provided in advance of the development roll-out.

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?

The Review of Highway Network and Bridge Initiatives took account of the Event Day Traffic Management Strategy, and confirmed that the longer term transport strategy is compatible with the event day traffic management arrangements.

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?

This scheme is not specifically required to enable development rather than for event days. The scheme will assist with stadium egress, helps with bus connectivity, and helps reduce through traffic on Engineers Way. The issue of bus access to the north of Olympic Way is a separate but related issue. We would not look to make this the prime north-south route for buses, but it gives flexibility in terms of future bus routing.

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?

The scheme at Wembley Hill Road and Empire Way was delivered in advance of the Olympics as part of the Olympic Corridor Project with the purpose of providing a more attractive and easily accessible public space for the community and visitors through the removal of the existing gyratory. Restoring the previous priority at this junction would result in the loss of public space and reduction in the quality of the environment. The

situation is being monitored and the Council is of the view there is currently no clear justification for a change back to the previous layout on the basis of 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 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?

The emphasis was intended to be that, rather than advocating removal of the ramps per se, if a proposal came forward to remove the ramps, then the Council would support this to improve the quality of the public realm. But safety would be the over-riding concern, and the Council would wish to see a safe solution above all.

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?

The existing ramps do not meet current standards for access for those with impaired mobility due to their gradient. At present, those wanting to access the stadium from the north must use a single lift situated on the northern side of the Stadium which, we are told, is subject to long queues during events. For those with impaired mobility, this proposal would provide alternative facilities such as lifts and Building Regulations compliant ramps. These would take up less space than the existing ramps, and would be designed in a way which does not compromise public safety and convenience. A hybrid (part full, part outline) planning application was submitted in 2006 by Quintain Estates and Development Ltd which proposed the replacement of the ramps with steps, a ramp and lifts together with the construction of buildings on the two adjoining sites that were taller than that approved through the existing Outline Planning consent relating to that land. This included a set of stairs on either side of a centralised ramp and also included lift access from ground level to the upper level of the stairs (known as the lower concourse). This application was supported by the "Wembley Stadium Pedestrian Movement Study" which examined access and egress to the Stadium, but was ultimately withdrawn.

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?

The parking standards in the AAP are in keeping with the London Plan standards and strike a balance between maintaining the competitiveness of our local areas whilst, at the same time, reducing the modal share of car trips in line with the objectives in the Plan. The relevant parking standards can be found on page 205 of the London Plan and include maximum parking standards for retail uses and a range for employment uses. The London Plan also states all residential development in areas of good public transport accessibility should aim for significantly less than 1 space per unit. Policy 6.13 of the London Plan states

that the maximum standards set out in Table 6.2 should be used to set standards in DPDs. Consequently, boroughs are not required to repeat the London Plan standards but to develop their own standards to meet local circumstances in line with London Plan maximum standards.

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

In our discussions with the stadium, we have stressed that as a planning document, the AAP is not the place for a detailed event day parking strategy. We will work with the stadium to address the issue of pirate parking on event days, but this would be undertaken outside of the AAP.

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?

The public transport proposals in the AAP will be effective in supporting the regeneration and growth envisaged for Wembley as evidenced by the Wembley Transport Strategy Key Component Study and Review. The Council has been working in close conjunction with TfL in developing proposals.

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?

A significant element of the strategy for tall buildings (submitted as part of the evidence base) involved an in-depth analysis of the protected views set out in the UDP, given that the views set out in the UDP were based on the original stadium. The study included the analysis of views against development that has already been permitted and/or built since the UDP was produced. The main conclusions of this element of the study were that the protection of views should focus on local views, rather than those outside of the borough. Additional views have been included within the AAP where it was considered that they are of significant importance to the character and local identity of the area. 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?

Policy WEM 5 states that: Where tall buildings are proposed in areas designated as 'appropriate' and 'sensitive' the Council will require the submission of a key views assessment to accompany planning applications.

Matter 6: Community Infrastructure Levy and Obligations

Issue 1 – CIL Regulation 123 List

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

By the end of 2013.

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

The Council is providing clear planning policy guidance as to the acceptable scale and mix of uses for development in the Wembley area through the Core Strategy, the Wembley Masterplan SPD and the WAAP. The Council's clear vision for the area and its planning policy framework provide the private sector with the certainty required to make informed investment decisions moving forward.

The Council has made exceptional circumstances relief from CIL available in the borough in accordance with the CIL Regulations.

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?

The existing Proposals / Policies Map for Brent, 2011 will be updated in accordance with the changes proposed in the Area Action Plan.

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

The key diagram and site proposals form part of the Area Action Plan. The Proposals/Policies Map will be amended accordingly to reflect the site proposals and Strategic Cultural Area, amended Strategic Industrial Location and extended town centre boundaries as identified on the key diagram. The existing Proposals Map (2011) includes the growth area boundary.

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?

The land take maps form part of the site proposal. They have been included so that the actual land requirement for each site proposal is clearly shown at a larger scale than shown on the Site Proposals maps. The land acquisitions will be brought forward on redevelopment or when fulfilling infrastructure proposals.

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?

The land take is required to achieve the level of development set out in the WAAP. The Council's intention is to acquire through negotiation and is not proposing CPO at this stage. The Council will continue to monitor the situation.

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?

No they are not mutually exclusive. The proposed changes are to the borough-wide Proposals Map published in 2011. The focussed change referred to, i.e. to the town centre boundaries is a further proposed change to the Proposals Map and replaces the proposed town centre boundary designations as set out in the Submission version of the AAP.

Proposed minor changes are to improve legibility by providing clarification and correction. They are set out in the table Schedule of Proposed Minor Changes which was submitted electronically and as a hard copy.

Proposed focussed changes relate to a specific part of the AAP, Map 4.4, affordable rent, the town centre boundary and indicative development capacity of site W12. The justification is set out in the table Schedule of Proposed Focused Changes which was submitted electronically and as a hard copy.

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?

This is an omission. The site proposals will be included on the updated Proposals / Policies Map.

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

The Proposals / Policies Map will be amended accordingly to reflect the site proposals and Strategic Cultural Area, amended Strategic Industrial Location and extended town centre boundary as identified on the key diagram. The existing Policies Map includes the growth area boundary.

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?

The Council identified infrastructure requirements (Infrastructure and Investment Framework-IIF) across the borough and in Wembley in particular to support its Core Strategy in 2008 and updated this IIF in 2011. With the development of the Council's Community Infrastructure Levy (CIL) proposals, it has commissioned further work to develop a Strategic Infrastructure Plan. This updates the predicted IIF needs from 2011 and then prioritises them against a set of benefits criteria. This is a process that will manage shortfalls in the delivery of infrastructure overall by firstly prioritising the infrastructure that supports further development (which provides further CIL to increase infrastructure). Secondly, the Council will prioritise infrastructure which helps bring in match or supporting funding. So, for example, a junction improvement that attracts TfL funding may get greater priority as it helps CIL, S106 and other funding reach down the priority list.

This is a mechanism that is currently being developed, and to which the Council signposts in the AAP. It is accepted that there is, and there is always likely to be, a shortage between a set of objectively assessed needs and the means to satisfy them all through the development process. The Council will be as effective as it can in prioritising needs within available resources. The Council will also continue to undertake bidding activity to secure alternative funding. The Council will continue to work with Central Government, and argue for resources, to meet its assessed needs. The Council can also evidence where it has acted in creative ways in Wembley to secure 'meanwhile uses' that can secure the use of cheaper short term alternatives that help support community uses for example, until such times that the Council can secure more meaningful long term community space.

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?

The focussed changes have been agreed for submission by the Council's Executive Committee on 11th March 2013.

The minor changes were not reported to committee as they are purely for legibility.

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

Focussed changes are a change which affects a specific part of the development plan and are therefore main modifications. This is in keeping with the Planning Advisory Services suggested terminology. It is not felt the changes proposed are extensive as they do not run right through the plan and do not impact on large parts of the document.

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?

At present the agreement from the GLA to the focussed changes is verbal after meeting with GLA officers to discuss them. The council has written to the GLA seeking written confirmation of their agreement.

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?

The focussed and minor changes have not been published for public consultation.

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

The proposed changes have not been subject to Sustainability Appraisal as it was not felt the changes propose significant alterations to policy which will result in social, economic and environmental impacts.

- Proposed minor changes and correction to map 4.4 are for clarification and therefore will not have significant social, economic or environmental impacts.
- Amendments to WEM 18 are for clarification to reflect affordable rent as set out in the NPPF.
- The Council does not feel that adjoining town centre boundaries as opposed to a combined town centre will impact on the delivery of the AAP or the realisation of its objectives.
- Proposed amendments to indicative development capacity of site W12 is to reflect planning consent granted in 2011. The planning application underwent an Environmental Impact Assessment.

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

Yes

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

No not currently, but this could be produced if required.

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.

The focussed changes relate to the soundness of the plan. Proposed focussed changes to policy WEM18 on affordable rent and the town centre boundary are to ensure the AAP is consistent with national and regional policy. Proposed focussed changes to map 4.4 and indicative development capacity in policy W12 are on the grounds of justification.

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?

Solum Regeneration, Guide Dogs for the Blind, Costco, Quintain and Wembley Stadium (FA Group) expressed an interest in participating at the oral part of the examination. The Programme Officer is to communicate with all representors asking if they wish to speak at hearing sessions.

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