

# Wembley Area Action Plan: Preferred Options (August 2012)

Responses to representations  
February 2013

NB Where 'Brent' is included under Representer this indicates that the proposed change is not in response to a representation but is being made to update or provide clarification.

### Chapters 1-3

Representer	Policy	Comment	Response
Ace Cafe	1.4	<p>Summary:</p> <p>I note that the document makes no reference to Ace Cafe London and no clear reference to the Stonebridge area. This is an area identified at Item 1.4 of the Wembley AAP vide "As far as the North Circular Road, which is also the main gateway to the area by road" - this being location of Ace Cafe London - further stating "Although this is a tightly defined area, its future is extremely important to the borough as a whole" etc.</p> <p>I submit that Ace Cafe London, and environs thereto, should be shown in the Wembley AAP.</p>	<p>The reference to the North Circular Road relates to the section that runs through the AAP area, at the eastern end of the industrial estate.</p> <p>The function of the AAP is to build on Core Strategy policy CP7 to provide detailed policy and guidance for the Wembley Growth Area. While Ace Café is recognised as a notable building and destination in the borough, its location in Stonebridge falls well outside the area covered by the Wembley Area Action Plan. It is therefore not considered appropriate to include Ace Café in the AAP.</p>
Natural England	Introduction	<p>Natural England welcomes the references to new open spaces as part of a sustainable development approach and recommends the Council to encourage and commend developers to adopt this approach.</p> <p>Biodiversity and the natural environment can lead to various opportunities, not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality of life.</p> <p>This should be made explicit in the Plan and policies included to ensure the borough's green infrastructure is designed to deliver multiple functions.</p>	<p>Accepted that the benefits of biodiversity and the natural environment should be made more explicit.</p> <p>Add to 11.1: There is a lack of open space in Wembley and access to existing open spaces is limited. <u>Biodiversity and the natural environment can lead to opportunities, not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality of life.</u> The strategic policies set out in the London Plan support the protection of local open space...</p>
TfL	1.1	When applicable, TfL will support the borough in	Support noted.

		both negotiating and securing planning obligations particularly on those applications that are referable to the Mayor. TfL may also be a signatory to the agreement if they have a land or infrastructure protection or other key major infrastructure interest in the development site.	
QARA	2.8	"Fundamental conformity"? – does this mean that there are some areas of details in which there is not conformity – please clarify.	This refers to the legislative requirement that London boroughs' planning policies must be in general conformity with the London Plan. This is tested through consultation with the Greater London Authority and Examination in Public.
Dr Anoop Shah	3.1	This paragraph mentions "sustainable" and "well connected", but currently a major problem with this area is that there are very few pleasant and convenient cycle routes, so people travel short distances by car which causes pollution, congestion and parking problems. Roads which are safe and convenient for walking and cycling will encourage people to use active transport and will have health and financial benefits.	The paragraph refers to the vision and objectives for the future of Wembley. It is acknowledged that connections can be improved and made more sustainable, particularly in relation to cycle routes.
Dr Anoop Shah	3.2	The vitality and viability of Wembley's town centres can also be enhanced by improving local access by bicycle and walking. Reducing the amount of motor traffic will make them more pleasant and will encourage more people to visit. Housing needs - all new housing should have secure cycle parking - at least one space per bedroom. Lack of parking particularly in large blocks of flats is a deterrent to bicycle ownership and the use of bicycles for transport.	Improvements to pedestrian and cycle routes into Wembley town centres and modal shift away from private motor vehicles is examined in Chapter 6 of the AAP.  Cycle parking for new development is already a requirement through planning policies and should not be repeated here.
Quintain	Vision & Objectives	In the reiteration of the Vision for Wembley on page 13 and within the Housing Needs objective on page	It is accepted that in relation to affordable housing, as with other requirements of development proposals,

		<p>124 there is reference to the target of 50% of all new housing to be affordable. Notwithstanding that this is a target, we consider that it is important to have regard to the reality of viability (as has been recently demonstrated through the appraisal of the NW Lands Development) and the implications of the Community Infrastructure Levy (CIL) which we consider will have an impact on the deliverability of the level of affordable housing within the Borough.</p>	<p>viability needs to be taken into account. This principle is established within the London Plan and by paragraph 5.92 of the Core Strategy. A reference to the viability of schemes will be included in a new overview section of the WAAP:</p> <p><u>Priorities for Investment</u>  <u>Priorities for infrastructure investment in the Wembley Growth Area include open space, play facilities, accessibility and cycling routes, wildlife enhancements, health, schools and community facilities. These are set out in the council's Infrastructure and Investment Framework (IIF). This document is subject to regular review.</u></p> <p><u>The AAP also sets out priorities for developer contributions, appropriate to the scale of the proposed development. Essential requirements include flood mitigation, transport improvements and affordable housing. Developers will also be encouraged to provide low-cost business start-ups, public realm improvements, public art, and connection to a decentralised energy system.</u></p> <p><u>Delivery of these investment priorities is dependent on resources and viability. Infrastructure will be delivered through the Community Infrastructure Levy and the IIF includes opportunities for funding sources to complement developer contributions. The council will work closely with delivery partners such as developers, Greater London Authority and Transport for London.</u></p>
GLA	Vision &	Agree with approach adopted	Support welcomed

	Objectives		
Wembley Stadium (FA Group)	Vision & Objectives	We welcome the placing of Wembley Stadium at the centre of the AAP vision and objectives, as the future business health of Wembley Stadium is an essential foundation for the area's regeneration aspirations. The development of new housing and jobs with the associated infrastructure must be managed in a way that helps promote increasing activity at Wembley Stadium and not in a manner that will restrict it.	Support welcomed
Wembley Stadium (FA Group)	Vision & Objectives	The vision also sets out objectives to promote improved access to Wembley to reduce the need to travel by car. This is to be achieved by creating a well-connected accessible location where sustainable modes of travel are prioritised with the objective that the mode share for car trips to Wembley is reduced from the current level of 37% towards the more sustainable level of 25%. We strongly welcome this policy initiative and the reduced parking standards that you will need to adopt within the AAP to achieve this. With such ambitious development aspirations in the AAP for providing at least 11,500 new homes between 2010 and 2026, plus three new hotels, a 25% up lift in retail floor space and 10,000 additional full-time jobs created by 2031, the shift to greater use of sustainable modes will be essential if the area is not to suffer from constant traffic congestion and delay.	Support welcomed
Brent Campaign Against Climate Change	Vision & Objectives	<ul style="list-style-type: none"> <li>To preserve open spaces for recreation and biodiversity and create new and enhanced open spaces to address deficiencies where possible, but particularly to meet the needs of additional</li> </ul>	Support welcomed.  See also responses below.

		<p>population commensurate with current levels of provision. AGREED</p> <ul style="list-style-type: none"> <li>• To increase the amount of public open space (at least 2.4ha within Wembley) and the amount of land with enhanced ecological value. AGREED</li> <li>• To enhance green and blue infrastructure by tree planting, returning rivers to their more natural courses and mitigating the pollution effects of development. AGREED</li> <li>• To achieve sustainable development, mitigate &amp; adapt to climate change. AGREED</li> <li>• To reduce energy demand from current building regulation standards and achieve exemplar low carbon schemes and combined heat and power plants. RESERVATIONS SEE BELOW</li> <li>• To create a well-connected and accessible location where sustainable modes of travel are prioritised and modal share of car trips to Wembley is reduced from 37% towards 25%. AGREED AS A START BUT NEED TIMELINES FOR MORE AMBITIOUS TARGET</li> <li>• To promote access by public transport, bicycle or on foot and reduce car parking standards because of Wembley's relative accessibility AGREED</li> </ul>	
English Heritage	Vision & Objectives	<p>We acknowledge that the area defined by the AAP does not contain a vast amount of designated heritage assets. However the area and its surroundings do contain a range of assets, of which some are of historic interest or add to the areas local character. In this context we are disappointed that the "Vision and Objectives for Wembley" (pages 12-13) do not make any reference to the need to conserve and enhance the areas historic and local character. This omission is contrary to the NPPF and</p>	<p>Disagree.</p> <p>The Wembley AAP seeks transformational change for most of the area outside the SIL. Other than the individual buildings of historic interest mentioned in Chapter 4, it would not be in line with Core Strategy policy CP7 or the WAAP's vision for redevelopment and regeneration to preserve the local character as it is.</p>

		the need for local planning authorities to set out a positive strategy for the conservation and enjoyment of the historic environment (para 126). It is also important to ensure that as part of plan making, local authorities should seek opportunities to achieve each of the economic, social and environment dimensions of sustainable development, and ensure net gains across all three (para 152). This includes setting out, in the context of the AAP, strategic priorities for the conservation and enhancement of the historic environment (para 156). The AAP does not address these aspects of the NPPF adequately.	
Natural England	3.2	<p>Paragraph 3.2 sets out objectives for the area, which includes “protecting and enhancing the environment”.</p> <p>This is welcomed and supported by Natural England, see our comments above also.</p> <p>The Council should look at the potential to alleviate fragmentation of open spaces and the linking of them back to paths and other sites, through green infrastructure, where possible and appropriate</p> <p>The promotion of biodiversity and the inclusion of Green Infrastructure as part of development are to be encouraged, complying with paragraph 118 of the National Planning Policy Framework. This approach will also help increase as well as enhance the provision of biodiversity and ecology potential for the area and would be in line with our comments.</p>	<p>Support welcomed.</p> <p>The inclusion of green infrastructure as part of development is a requirement of policy WEM34 and the promotion of biodiversity is included in WEM41 and WEM42. Additionally, the Plan includes a proposal for a new pedestrian bridge link across the Metropolitan / Jubilee lines linking Chalkhill open space with the River Brent park.</p>
QARA	3.1	Is 15 yrs. Time = to 2027? – if so then state this clearly.	This is a reference to the National Planning Policy Framework (NPPF) requirements that Local Plans be drawn up over an appropriate time scale, preferably a

			<p>15-year time horizon, take account of longer term requirements, and be kept up to date.</p> <p>This means the AAP contains a plan for growth in Wembley for the next 15 (or so) years, not that the policies will cease to form part of the development plan in 15 years' time.</p> <p>While the council feels there should not be a 'completion' date for the AAP, we can include a reference to the adoption of the document when the policies will become part of the development plan:</p> <p>Change to 1.1: The Wembley Area Action Plan (AAP) <u>sets out the strategy for growth and regeneration in Wembley for the next 15 years, once adopted.</u> It is an important part of the development plan for the Borough....</p>
QARA	3.2	"Regeneration etc" – add "To give protection and security and low key maintenance to Wembley's natural open green spaces".	Disagree. This is too detailed for high level objectives. There are already policies in place to protect green spaces (eg CP18 of the Core Strategy).
QARA	3.2	(Modern, service Etc) – Add "Increase the supply of modern subsidised workplace developments for Engineering and Technology".	Disagree. This is too detailed for high level objectives. WAAP policy WEM11 deals with low-cost business start ups.
QARA	3.2	(Promoting Wembley etc) – include "new public engineering and technology displays and designs" – the traditional "expensive" public funded "public art" is often only appealing to "town planners, local officials who appear on an "Art" bandwagon" and a minority of the public.	Disagree. This is too detailed for high level objectives. Public art is supported through WAAP policy WEM4.
QARA	3.2	(People's needs) – Add "including green open	Disagree.



		space”.	This is included under objective ‘Protecting and enhancing the environment’.
QARA	3.2	(Housing Needs) – I query the 50% (approx) fig.!	The 50% affordable housing target has already been examined and adopted as Core Strategy Policy CP2.
QARA	3.2	(promoting improved access, etc) – Add “park and ride schemes”; Add in “ sustainable means of travel = cars with improved fuel consumption plus electric cars and motor cycles / scooters”.	This is too detailed for high level objectives. Funding for a park and ride scheme is not available. The plan must be deliverable and this would be an unachievable ambition.  London Plan policy 6.13 requires 1 in 5 car parking spaces to provide an electrical charging point to encourage the uptake of electric vehicles. It is not necessary to repeat this policy in the AAP.
QARA	3.2	(Protecting and Enhancing etc) – Add bullet point “Provision of “vertical” allotments commensurate with current levels of provision to meet the needs of additional population”.	This is too detailed for high level objectives. Allotments are dealt with in section 11.11.

#### Chapter 4: Urban Design and Place Making

Representor	Policy	Comment	Response
English Heritage	Strategic Policy section	It would be useful in the Strategic Policy section of the AAP to make reference to CP17 Protecting and enhancing the Suburban character of Brent, in order to help set the context for the AAP.	Agreed. Add additional paragraph at end of Strategic Policy section: <u>Given that Wembley is an area where suburban residential development interfaces with a much more urban character of development it is important to consider Policy CP17 which states that the suburban character of Brent will be protected from inappropriate development.</u>
GLA	4.4	Agree with approach adopted	Support welcomed.
Brent	4.5-4.9		Structural amendment – move section to new strategic chapter and re-name <u>History of the Area</u>
QARA	4.13	Add – indicate on the map location of the 2	Agreed. Replace picture 4.7 with map indicating location

		Conservation Areas (i.e. Barn Hill and Wembley High Street)	of heritage assets.
Brent	4.15-4.19		Structural amendment – move section to strategic chapter
Quintain	4.16	There is an error in paragraph 4.16 where there is the suggestion that the main focus of our regeneration will remain the land to the 'east' of the Stadium. We believe you meant to put 'west' but additionally, we would point out that whilst the focus of development to date has been to the west of the Stadium we do still have the intention of developing the land to the east of the Stadium within the Stage 1 Development Area as permitted.	Agreed. Change to para 4.16: In 2011 permission was granted for a second stage of mixed-use redevelopment to provide up to 160,000m <sup>2</sup> of floorspace in the area north of Engineers Way, from Olympic Way to Empire Way. <del>It is likely now that the main focus for the Quintain regeneration will remain to the east of the Stadium and Olympic Way.</del> <u>The focus of development to date has been to the west of the Stadium. Into the medium-term, development is more likely to take place in the north west of the area.</u>
Wembley Stadium (FA Group)	4.19	We welcome this vision for urban design and place making for the area around Wembley Stadium.	Support welcomed.
QARA	4.21	Add words to the effect – “denser housing provision and amenity will be “dog free”.	It is beyond the remit of the development plan to specify the ownership of pets within new development.
GLA	WEM1	Agree with option	Support welcomed.
English Heritage	WEM1	We welcome the section on Buildings of Historic or Architectural Merit, which then, in part, feeds into the section Character & Urban Form. In general we are also encouraged by policy WEM1 in that it provides a broad policy context relating to the character of Wembley. However WEM1 should be developed further so that it makes an explicit reference to the historic environment that helps characterise the area and its surroundings, and the need to conserve and enhance the areas heritage assets and their settings. In addition we would urge you to develop this policy further so that it also captures the local and historic character of the area	Support welcomed.  Suggested changes to paras 4.10-4.13, 4.20-4.22 and WEM1 to improve clarity and strengthen role of historic buildings in developing future local identity for the area.  <u>Local Character</u>  Buildings of Historic or Architectural Merit 4.12 Historic buildings and areas provide a depth of character to the urban experience that cannot be underestimated. <u>They provide continuity and connection with an area's past provides the building blocks for which</u>

		<p>as a whole, and sets out a robust framework for its future management that reinforces positive distinctive aspects of sub-character areas. This approach would reflect the NPPF (e.g. para's 58 and 126). To help achieve this aim, the details of the character areas could help highlight key specific policy issues within the context of WEM1. With regards to the supporting text, the subdivision of the AAP area into sub character areas is welcomed. However we would urge you to make reference to the any heritage assets that maybe present in the relevant sub area. For example the positive contribution of the character and history of the grade II Empire Pool (Wembley Arena) should be highlighted in the text relating to the Stadium Comprehensive Development Area (page 21). This approach would then help link the importance of conserving the areas heritage assets as part of the Council's approach to regeneration. This level of detail should be developed further in the Site Proposals.</p> <p>For example the significance of the Empire Pool, as a heritage asset, should be summarised and used to inform the details of Site W8 (page98). This approach should be applied to all heritage assets where they could be directly or indirectly impacted by Site Proposals.</p>	<p><del>helps establish the developing local identity and establishing a unique character in of an area.</del></p> <p>4.10 The Plan area <del>does not have a significant amount of historic buildings or buildings that are considered to be of an exemplary architectural quality. There are</del> contains five <del>four</del> buildings within the area that are considered to have significant historic or architectural merit (shown on Map X):</p> <ul style="list-style-type: none"> <li>• Church of St John – <del>Grade II</del> <u>Originally constructed in 1846 this flint building with stone dressings was designed in the Early English style (Grade II). The front boundary wall and lynch gate of St John's Church has a separate (Grade II) listing. It is a brick structure, contemporary with the church, with decorative cast-iron boundary railings on a dwarf wall with a picturesque wooden lych-gate to the main road. Any new development within the vicinity of this building should consider how the use of materials and architectural detailing responds to the historic character of the building.</u></li> <li>• <u>St Andrew's Presbyterian Church, Ealing Road – A former Presbyterian church built in 1904, in a style strongly influenced by the Arts and Crafts manner. Currently in use as a Mosque (Grade II). New development must not detract from the key role that this building plays within the streetscape.</u></li> <li>• The Empire Pool (Wembley Arena) - <u>Designed by Sir E Owen Williams and built in 1934, it has a</u></li> </ul>
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			<p><u>reinforced concrete frame which was the largest concrete span in the world at that time. The original pool was 200 feet long and 60 feet wide and was used for the 1948 Olympic Games. The building has recently been refurbished and is currently predominantly utilised as an entertainment venue (Grade II). The building has an important role due to its historic associations, its location at the heart of the regeneration area, and its associated public space (Arena Square). Development in close proximity to the Arena must be designed to respect the scale, proportions and materiality of the building.</u></p> <ul style="list-style-type: none"> <li>• Brent Town Hall - <u>Built in 1935-40 as Wembley Town Hall to designs by Clifford Strange. It is a brick-clad steel frame building expressed in T-shaped plan set around central entrance hall with a Scandinavian style 3-storey front (Grade II). Given the role that this building has historically played within the borough along with its highly visible location and attractive landscape setting, any new development, extensions or alterations must seek to preserve or enhance the existing building.</u></li> <li>• Wembley National Stadium – <u>Designed by Foster &amp; Partners, the building was completed in 2007. Although not Statutorily Listed the building is nationally and internationally recognised for its iconic arch. Due to the defining role that the stadium plays across the AAP area, the council</u></li> </ul>
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			<p><u>will seek to preserve its imposing presence through the sensitive scaling of surrounding buildings in line with the approved Quintain Stage 1 development and the 2009 Wembley Masterplan SPG.</u></p> <p>4.13 There are two Conservation Areas on the fringes of the plan area (shown on Map X):</p> <ul style="list-style-type: none"> <li>• Barn Hill Conservation Area</li> <li>• Wembley High Street Conservation Area</li> </ul> <p>4.14 As well as development within close proximity to these Conservation Areas, consideration should also be given to the impact on views into and out of these areas.</p> <p><del>4.11 Although there are only four important buildings in the area, it is the significance of these buildings at a local, regional and national level, and their role in the townscape, that has a real impact on the character and future development of Wembley.</del></p> <p><u>Although there are few listed buildings in the area, there are a number of locations where a building or a collection of buildings are considered to add to the richness of the urban fabric, for example along Wembley High Road. Any redevelopment proposals will need to fully justify the removal or replacement of such buildings.</u></p> <p>Local Character Areas</p> <p>4.22 The Wembley AAP area has <del>been divided into 5</del> localities that have broadly distinctive characteristics</p>
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			<p>of building typology, movement infrastructure and urban grain. This provides the basis for understanding the existing character of each area and how <del>to develop</del> this <u>will form the basis for a distinctive identity into the future.</u> The following section <del>will</del> <u>outlines the broad principles that should to guide development in each locality and provide an indication of the range of building typologies that the council views as acceptable.</u></p> <p>[Insert local character area sections – paras 4.23-4.43]</p> <p><del>Character &amp; Urban Form</del></p> <p>4.20 Across the AAP area there are a variety of different urban conditions that have evolved as a number of distinctive localities. Although in close physical proximity, currently the areas are functionally disconnected from one another and, other than the Stadium, there is nothing which defines Wembley as a whole. <u>Policies elsewhere in this Plan, such as Gateways, Public Realm and transport will help address this.</u></p> <p>4.21 The vast amount of development already undertaken or given permission in Wembley is of a <del>similar large scale and typology (larger blocks of predominantly 1 &amp; 2 bed flats).</del> <u>The area near the Stadium is being transformed into a high density urban destination, with taller buildings and a mix of uses. Other areas, such as the Strategic Industrial Location, will not experience such significant change</u></p>
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		<p><u>during the Plan period. Wembley town centre will provide both continuity, by maintaining its role and function as a Major Centre, and contribute to a new local character, for example along the new pedestrian and cycle priority route. If Wembley is to genuinely become an attractive and sustainable mixed-use district of London it is vital that it can offer residents and visitors a range of facilities, attractions and accommodation in a variety of urban settings.</u></p> <p><b>WEM 1</b></p> <p><del>Character and Urban Form</del> <u>Local Character</u></p> <p>Development within <u>each</u> Wembley <u>character area</u> should <del>seek to reinforce and emphasise</del> <u>have regard to the broad development principles set out above</u> for <del>distinctive character of each locality through well considered building and public realm design</del></p> <p><u>Development should seek and exploit opportunities to whilst strengthen ing the connections between each of the areas</u></p> <p><u>The council will require planning applications for development affecting buildings of historic or architectural merit to demonstrate how proposals will conserve their significance and setting.</u></p> <p>Para 4.29 to be amended to read: Currently the townscape character of the Comprehensive Development Area offers little in the way of consistency. There are a range of building typologies that have no real relationship to one another and the area currently lacks the appropriate quality for the setting of an international</p>
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			<p>icon such as Wembley Stadium. <u>The grade II listed Empire Pool (Wembley Arena) is one of the most significant historic buildings in Wembley.</u> Given the scale of planned regeneration it is more appropriate to analyse this area based on the development that has already been permitted.</p> <p>Proposed additional sentence at end of text for Site W8 Land West of Wembley Stadium:</p> <p><u>The grade II listed Empire Pool (Wembley Arena) is one of the most significant historic buildings in Wembley. Any new development within close proximity of this building must provide a full and adequate assessment of potential impacts as part of a planning application.</u></p>
Brent	4.27	Amendment for clarity	<p>Given that public transport accessibility is high, the council will support a relatively dense form of residential development, particularly in close proximity to the stations. However, given the existing suburban character around and the significant amount of flats already permitted in the area, the council would look favourably on low-rise high density options including houses <u>on sites adjacent to existing suburban areas.</u></p>
Brent	4.28	Amendment for clarity	<p>The council may support development of the Chiltern Cutting sites, but only where the majority of the development is focussed to the south of the railway lines and significant measures are taken to preserve the ecological value of the area.</p>



			<u>There are two supplementary planning documents (SPD) to guide development in the Wembley High Road area: Wembley Link SPD (2011) and Wembley West End (South) SPD (2006).</u>
Brent	New para after 4.31	Additional sentence for clarity	<u>Much of the area is designated as a Strategic Cultural Area where leisure, tourism and cultural uses are particularly encouraged.</u>
Wembley Stadium (FA Group)	4.32	We welcome this policy proposal and the objective of retaining the processional route and proportions along Olympic Way.	Support welcomed
GLA	4.33	Agree with approach adopted	Support welcomed
GLA	4.36	Agree with approach adopted	Support welcomed
Quintain	4.37	We are supportive of the ambition set out in paragraph 4.37, which states in relation to the land to the east of First Way district that 'the aspiration for this area is to introduce a wider variety of uses in order to provide a careful transition from the broader mixed use offer to the west'.	Support welcomed  Suggested change to 4.37: The aspiration for this area is to introduce a wider variety of uses in order to provide a careful transition from the broader offer of mixed used development in the west, through to the Strategic Industrial Locations in the east. <u>Much of the area is designated as a Strategic Cultural Area where leisure, tourism and cultural uses are particularly encouraged.</u>
GLA	4.40	Agree with approach adopted	Support welcomed
Dr Anoop Shah	4.47	The map should separately show key cycle routes and key routes for motor traffic. In general motor traffic should be facilitated in moving between Brent and the main roads, but not for making short journeys within residential or shopping areas of Brent, in order to keep high streets and residential	A new map showing key cycle routes will be included in chapter 6.

		areas relatively traffic-free and pleasant. Key cycle and pedestrian routes should run through Brent connecting town centres, stations, schools etc.	
Dr Anoop Shah	4.50	Wembley already has many bus routes and roads which facilitate car travel. However the proportion of journeys made by bicycle is tiny, despite the fact that many people living in Brent and the surrounding areas want to be able to ride around safely on their bicycles. People will vary their choice of mode of transport based on what is most convenient, pleasant and cheap. Currently people come by car because it is more convenient than other modes, but if cycling were made more pleasant and convenient some of these people would choose to cycle instead. It would be inappropriate to encourage car use simply because many people arrive in Wembley by car at the moment.	<p>Proposed changes to paras 4.48-4.51 and WEM2 to strengthen policy area, in line with NPPF 154, incorporate aims of Masterplan and align with other sections of the AAP, in particular transport and public realm:</p> <p><del>A Legible Wembley</del> <u>Gateways</u></p> <p><u>Gateways increase legibility in an area by providing a recognisable point of entry. Wembley attracts many first-time visitors and it is important to create a comprehensible area for those arriving by public transport, foot, bicycle and road. The principle gateways into Wembley are shown on Map 4.1; these are Wembley Central Station, Wembley Stadium station, Wembley Park Station and the entry to the industrial estate from the North Circular Road. The junction at Engineers Way and Olympic Way is also an important node in terms of legibility. Architecture and public realm design should reinforce the role of these gateways and nodes as important elements of the urban experience. New development should contribute to a sense of arrival and legibility of the area.</u></p> <p><u>Three Stations</u></p> <p>4.44 In order to create distinctive, safe and attractive</p>

		<p>arrival points into Wembley, Brent Council has pursued a 'Three Stations Strategy' that has seen the transformation of Wembley's three stations to ensure visitors are able to arrive and depart quickly and comfortably, whilst minimising potential negative impacts on local residents and businesses.</p> <p>4.45 Improvements include:</p> <ul style="list-style-type: none"> <li>• A major refurbishment and extension of Wembley Park Station completed in 2006, increasing its capacity to 37,000 passengers per hour on stadium event days.</li> <li>• The iconic White Horse Bridge and a new public square at Wembley Stadium Station, completed in 2006, designed to link the stadium and its surrounding regeneration area with the existing town centre.</li> <li>• Modernisation of Wembley Central Station as part of a large mixed use development that has seen the creation of a new public square and lively heart to the town centre (improvements ongoing).</li> </ul> <p>4.46 The work undertaken to date on the three stations has made a genuine difference to the perceptions of the area. Although there have been significant improvements to the three stations, there still needs to be more work undertaken at these arrival points, particularly Wembley Stadium Station. <u>The council will continue to prioritise and improve these gateways through policies such as WEM17 (Walking and Cycling) and WEM3 (Public Realm).</u></p>
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			<p><u>Arrival by foot/bicycle</u>  <u>The strategy for walking and cycling in the area is set out at WEM17. Gateways can help improve the pedestrian and cyclist experience of the area by providing a landmark and focal point, an aid to navigation and orientation, safe cycle parking, and areas for meeting and resting.</u></p> <p>4.49 <u>The key focal points for pedestrians are the three stations and the node at the junction of Olympic Way and Engineers Way. Once the Wembley Boulevard (shown on Map 13.1 and key diagram) is complete, a pedestrian-priority spine will run through the heart of the area - from Wembley Park Station (via Olympic Way) to Wembley Stadium Station (via Wembley Park Boulevard) and on into the town centre and Wembley Central station. The junction of Olympic Way and Engineers Way has been highlighted as a Principal Gateway node due to its central location and potential role in linking together the currently disparate areas of Wembley. This will of course only be realised be reinforced if an appropriate alternative to the Pedway pedestrian ramp is delivered (see para 6.35).</u></p> <p><u>While cyclists mostly access the area by road, there will be greater permeability into the area along this pedestrian and cycle priority route. Some of the key gateways will be appropriate for cycle hubs (see</u></p>
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			<p><u>WEM17) and as nodes for connections to the wider strategic cycle network.</u></p> <p><u>Arrival by Road</u></p> <p><del>4.50 However, a</del> <u>A significant amount number</u> of people (on both event days and non-event days) arrive in the area by bus, car or other modes of <u>road transport and the experience of coming to Wembley should equally cater for these people. The Plan's approach is one which balances the need to discourage car use by prioritising walking, cycling and public transport whilst ensuring that the area is accessible to traffic such as event-related coaches, waste collection and delivery vehicles, emergency services and disabled drivers (see 6.8).</u></p> <p>4.47 As well as improving the public transport infrastructure, a two-way tidal carriageway linking Wembley Stadium with the North Circular Road has been created along most of the route and, although the improvements have significantly eased traffic flows on event days, there is still no real sense of arrival when entering Wembley from the east.</p> <p><del>4.48 Given the scale of planned regeneration, the desire to create a sustainable mixed use community and the relative ease of access to the wider London region, the council will continue to focus on the three stations as hubs of activity and foci for development in the area.</del></p> <p>4.51 Although some significant improvements have been made, access into Wembley by road,</p>
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		<p><del>particularly from the North Circular Road (A406) lacks any real sense of identity or arrival.</del> Given that the eastern area will remain focused on employment uses, the principal means for improving legibility and public perception of the area will be to improve the public realm and way finding throughout the industrial estate. <u>Opportunities for new development to enhance main routes into and through the area should be exploited.</u></p> <p><del>The quality of development along key routes and the potential to enhance important junctions will be given significant weight when considering applications in these locations.</del></p> <p>WEM 2</p> <p>Gateways to Wembley</p> <p>The council will continue to focus on the three stations as the principle gateways into Wembley.</p> <p><del>The enhancement of nodes around key junctions will be sought, particularly to the east of the AAP area.</del></p> <p><del>Architecture and public realm design should seek to reinforce the role of these gateways and nodes as important elements of the urban experience.</del></p> <p><u>Any new development around the Triangle junction (High Road/Wembley Hill Road) must demonstrate how the strengthening of connections through the area has been considered.</u></p> <p><u>Development at principal gateways and key nodes will be expected to add to the sense of arrival and legibility of Wembley.</u></p> <p><u>The quality of development along key routes will be</u></p>
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			<u>given significant weight when considering applications in these locations.</u>
Dr Anoop Shah	4.51	Access by road should be improved for people cycling into Wembley, and junction improvements should incorporate international best practice solutions with segregation of cyclists, pedestrians and motorists at major junctions.	See proposed changes above and to Section 6 (Transport) where enhanced cycling facilities are addressed
GLA	WEM2	Agree with option	Support welcomed.
Dr Anoop Shah	4.54	Shared space and home zones are appropriate only on roads with no through motor traffic, where the only motor traffic is access to and from properties. It is essential that through motor traffic is prohibited and speed limits are very low (e.g. 10mph) for such areas to be safe.	<p>Proposed changes to paras 4.52-4.55 and WEM3 to strengthen policy area, in line with NPPF 154, incorporate aims of Masterplan and align with other sections of the AAP, in particular transport and Gateways:</p> <p><u>The public realm strategy for Wembley centres on the legibility of the pedestrian and cycle priority route which runs between the three station gateways, and connectivity between different character areas. To ensure a high quality public realm, the council will apply London Plan public realm policies when considering applications for new development.</u></p> <p><u>Public realm improvements are essential to improving the urban environment. The Wembley Masterplan identifies a number of public realm aims which development proposals should incorporate into the design, where practicable. These are:</u></p> <ul style="list-style-type: none"> <li>• <u>De-cluttering and rationalisation of street furniture</u></li> <li>• <u>Widening of footways</u></li> </ul>

			<ul style="list-style-type: none"> <li>• <u>Legible signage</u></li> <li>• <u>Placing street lighting on buildings, subject to preserving residential amenity</u></li> <li>• <u>Removal of unnecessary barriers to pedestrian and cycle movement</u></li> <li>• <u>Tree planting in the vicinity of new development, where possible.</u></li> <li>• <u>Integrating existing natural assets into the new streetscape, where possible</u></li> <li>• <u>Public toilets and services should be fully integrated into design of public realm</u></li> <li>• <u>Public realm should include places for people to linger, rest and socialise</u></li> </ul> <p><u>The legibility of the pedestrian and cycle priority route from Wembley Park station along Olympic Way and the Boulevard to Wembley Stadium station, across White Horse Bridge and the Triangle junction, and down Wembley High Road to Wembley Central station will be delivered substantially through a consistent approach to the public realm design, including hard and soft landscaping, signage and street furniture.</u></p> <p>4.52 It is envisaged that the design philosophy for the public realm could reflect local character and the land uses of a specific AAP area, rather than an area-wide corporate signature. <u>Street paraphernalia furniture should be kept to a minimum and, where</u></p>
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			<p><del>possible, grouped and/or rationalised to minimise its cumulative impact on the public realm.</del></p> <p><u>4.53 Wembley requires a safe, connected and inclusive public realm which reduces the need for physical barriers for pedestrians and cyclists (see WEM17). The relationship between pedestrian and vehicular circulation will have to be carefully designed to enable pedestrian predominance and movement. Shared space similar to Home Zones can be used to improve the public realm and environment for pedestrians. Shared space will only be appropriate in areas that have low levels of traffic, such as the new residential district (Site W18). It will not be supported in through-routes. High quality public realm around key gateways and nodes will be particularly important in creating better connections between the different character areas of the Plan area.</u></p> <p><del>Shared surfaces and dual use surfaces similar to Home Zones will be encouraged, particularly in residential locations.</del></p> <p><del>4.54 The council will seek to reduce the need for physical barriers and let the quality and character of spaces control circulation, speed and direction. Safety through consideration, rather than regulation, will be the guiding principle. Vehicular speeds could be significantly reduced through passive measures rather than relying upon barriers, high kerbs and excessive signage. Consideration will be given to the</del></p>
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		<p><del>removal of existing barriers to pedestrian movement wherever possible.</del></p> <p>4.55 The Core Strategy sets a target of planting 1,000 trees in the Wembley Growth Area <u>and these will mainly be delivered through developer contributions.</u> Street trees and other planting offer an opportunity to create a local character by the careful selection of complementary species relative to their setting and location. <u>Choosing the right tree for the right place is vital as urban streets are hostile places and trees are susceptible to damage from weather, vehicles and vandalism.</u></p> <p><u>Trees require as much soil rooting volume as possible which creates various problems when competing with underground services. Where possible, new development should exploit opportunities to run utility services in common channelling, leaving adequate space for tree planting.</u></p> <p><u>Species selection should be made in consultation with the council's Landscape Team.</u> The council will <u>encourage support</u> the use of more mature specimens <u>where appropriate</u> to accelerate the greening of existing hard urban environments.</p> <p>WEM 3</p> <p>Public Realm</p> <p><del>Public realm improvements will be sought that reflect local character as an integral element of proposals for new development.</del></p>
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			<p><u>The council will seek a consistent approach to the public realm along the pedestrian and cycle priority route between the three station gateways</u></p> <p><u>New development will be expected to contribute to connectivity in the area through public realm improvements at key nodes and junctions</u></p> <p><u>The council will require development to contribute to new tree planting</u></p>
GLA	WEM3	Agree with option	Support welcomed.
Natural England	WEM3	Policy WEM 3 refers to Public Realm and the Council and developers should look at the potential for green infrastructure to contribute towards the public realm, soft landscaping as well as hard landscaping.	Noted
GLA	WEM4	Agree with option	Support welcomed.
QARA	WEM4	Delete "Public Art" replace with words reflecting comments in point 5 above i.e. replace with an Engineering / Technological display / design. ADD "any public display will have a public "consensus" approval before commissioning".	When commissioning public artworks it is extremely difficult to establish a community consensus. Any proposals will follow the necessary statutory consultation procedures.
Brent	4.56-4.59 WEM4	Proposed changes to paras 4.56-4.59 and WEM4 to strengthen policy area, in line with NPPF 154, and incorporate aims of Masterplan	4.56 The council recognises the role that public art can play in the creation of attractive and distinctive places and spaces. Public art engenders legibility in the landscape and promotes local identity, instilling civic pride and encouraging inclusive environments. As well as being a hub of sporting and architectural excellence, Wembley has the capacity to accommodate some significant permanent artworks as part of a coordinated approach to public realm and open space design.

		<p>4.57 Public art should connect both local people and visitors to Wembley as a destination and a “place”; it could recognise and celebrate the diversity of Brent’s population; it could enliven buildings, spaces and places; it should stimulate, surprise, delight and amuse; and, it should enrich the lives of those who live, work and visit Wembley. <u>The council will seek contributions towards a range of permanent art works across the area. This could take the form of a single large piece, or alternatively number of linked, smaller scale interventions into the public realm.</u> Public art is not only considered to be permanent installations or artworks, but also music, dance, festivals and one-off occurrences. The design of public spaces should always consider how infrastructure such as stages, stalls and access to power and water for events could be provided where appropriate. This will influence the choice of materials as they will need to be robust enough to deal with heavy loads.</p> <p>4.58 Where proposals emerge around Principal Gateways or Key Nodes (Policy WEM2) consideration should be given to the incorporation of public art as a means of enhancing legibility and a local sense of identity. <u>Provision must be made for the setting of public art as part of the design process – areas considered suitable for installations should be identified early, to enable supporting infrastructure to be provided. The opportunity and potential for buildings and landscapes to be pieces of art in</u></p>
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			<p><u>themselves should not be missed.</u></p> <p>4.59 There are a number of existing open spaces in the AAP area and the Wembley Masterplan SPG 2009 proposes a series of new public open spaces. Where development proposes the creation of new open spaces, provision should be made for the setting of public art as part of the design process.</p> <p><b>WEM 4</b> Public Art <u>Where appropriate, the design of public spaces should allow for event infrastructure.</u> The council will seek contributions towards public art from development within the AAP area, particularly at key gateways or where new open spaces are proposed. <u>The design of new open space should include a place for public art.</u></p>
English Heritage	WEM5	<p>It is noted that Map 4.2 sets out a Strategy for Tall Buildings. It highlights areas where tall buildings will be inappropriate, sensitive to, and appropriate. This Map is supported by the text and on page 30, where reference is made to a Tall Buildings in Wembley study. Unfortunately we did not receive a copy of this study or we unable to access it on the Council's web page. Therefore our comments are based upon the evidence detailed in the AAP. In the absence of this information a point which we would wish to seek clarification relates to how the settings of heritage assets were assessed. For example the</p>	<p>Tall buildings will be acceptable in a limited number of locations within the AAP area. In areas designated as 'appropriate' tall building proposals should demonstrate that they will not cause harm to the significance of heritage assets, as well as their impact on key views of the Stadium. Any application for a tall building within Wembley will be required to submit a three dimensional digital model in a format specified by the council. Where necessary, the submission of heritage statements will be required.</p> <p>Additional paragraph after 4.62:</p>

		<p>grade II Empire Pool (Wembley Arena) is identified as falling within an area sensitive to tall buildings. To its immediate north, east and south the area is shaded as being appropriate for tall buildings. It is not clear whether the setting of the Empire Pool and how its surroundings contribute to its significance has been appropriately considered. English Heritage have published guidance on how to assess the setting of heritage assets (The Setting of Heritage Assets 2011 - <a href="http://www.english-heritage.org.uk/publications/setting-heritageassets/">http://www.english-heritage.org.uk/publications/setting-heritageassets/</a>). This guidance should be used as part of the sieve approach of assessing where tall buildings may or may not be appropriate. With this in mind we would suggest that Policy WEM5 should expand its requirement for information, in which to demonstrate the impact of proposals. For example tall building proposals should demonstrate that they will not cause harm to the significance of heritage assets (this includes their settings), as well key views of the stadium. In addition we support the policies emphasis upon the applicant to submit 3 dimensional modelling with their proposals. We would suggest that applicants should also submit heritage statements in support of their modelling. This would help address key aspects of the NPPF, such as para's 128 and 192.</p>	<p><u>In line with WEM1, the council requires planning applications for tall buildings affecting listed buildings and buildings of architectural merit to demonstrate how proposals will conserve their significance and setting.</u></p>
Environment Agency	WEM5	<p>Map 4.2 (page 31) indicates that the majority of areas adjacent to the Wealdstone Brook and the River Brent are marked as inappropriate for tall buildings. We support this because tall buildings in close proximity to a watercourse can have a detrimental impact on the ecology by shading of</p>	<p>Development appropriate to sites adjacent to the Wealdstone Brook is set out in the Site Proposals. This includes set-backs from the river.</p>

		<p>the watercourse and encroachment onto the river corridor. Our advice is that tall buildings are set-back to minimise this impact. If this is not possible any impacts from shading or encroachment would have to be mitigated for either on the site or elsewhere.</p> <p>The policy would help ensure that tall building proposals are not located near to watercourses. However, it would be useful if the guidance text (paragraphs 4.60 – 4.62) acknowledged the potential detrimental impact of tall buildings on the nature conservation of an area if located close to a watercourse and this should be avoided wherever possible.</p>	
GLA	WEM5 Tall Buildings	Agree, but should emphasise highest architectural quality and require submission of key views framework to accompany applications.	<p>Change Policy WEM5 to:</p> <p>Tall buildings will be acceptable in a limited number of locations within the AAP area, <u>where they can demonstrate the highest architectural quality.</u> <u>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 proposals must also fully demonstrate their impact on key views of the Stadium.</u> Any application for a tall building within Wembley will be required to submit a three dimensional digital model in a format specified by the council.</p>
Quintain	WEM5 Tall Buildings	Tall buildings are described as being over 10 storeys or 30 metres. Within Map 4.2, Wembley Retail Park	The inclusion of the Wembley Retail Park as an area sensitive to tall buildings does not preclude the inclusion

		<p>is described as being sensitive to tall buildings. However, the adopted Masterplan clearly identifies locations within this area that are considered suitable for buildings over 10 storeys. We consider that provided the other principles of good planning and urban design are observed then the location of tall buildings on the land currently known as Wembley Retail Park should be considered on its merits.</p>	<p>of tall buildings. Para 4.62 makes this clear in the fourth bullet which states “areas designated as ‘sensitive’ may have some scope for a tall building, but due to adjacent properties, site assembly or location of site (orientation etc) will require further work to establish an appropriate form of development.” The Site Proposal for Wembley Retail Park (W18) states explicitly that “the Wembley Masterplan sets out general 4-6 storey heights with taller elements (8-12 storeys) on identified corner plots on key junctions.”</p>
Westminster City Council	WEM5	<p>The AAP identifies a number of sites considered suitable for tall buildings within the action plan area (tall buildings are defined in the AAP as those over 30m tall). These opportunity sites are principally adjacent to the stadium / Olympic Way. We note that many suitable sites for tall buildings have already been developed, or have been consented and are pending development. We also note that three locations for particularly tall buildings of 45-75m have previously been identified in the Wembley masterplan (2009).</p> <p>The Mayor’s London View Management Framework identifies 17 views that originate in or cross Westminster; none of these would be impacted by tall buildings at Wembley. Westminster has identified 45 Metropolitan Views in our draft Metropolitan Views SPD. None of these would be impacted by tall buildings at Wembley.</p> <p>We are not aware of any locally significant views (identified in our conservation area appraisals) which would be likely to be compromised by tall buildings at Wembley.</p> <p>The only views of Wembley Stadium Arch from</p>	Noted



		Westminster are private views from tall buildings. While these views do undoubtedly hold some value, it is not considered proportionate to ask Brent to take them into consideration in drafting the Area Action Plan or for development management purposes.	
GLA	WEM6	Agree with approach adopted	Support Noted
Quintain	WEM6	WEM6 sets out the list of views of the Stadium that are proposed to be protected. As these are a change from policies BE34, WEM18 and WEM19, we consider that further information should be provided on the changes. We may also wish to make comments on such further information as it emerges.	A comprehensive review of the views set out within the UDP was undertaken as part of the Strategy for Tall Buildings. This has formed the evidence base for the policy WEM6. Given the fact that the previous views were based on the original Wembley Stadium and that a considerable amount of development has been undertaken since the UDP policy was introduced, it was considered appropriate to remove a number of views that were no longer deemed relevant. It was also deemed appropriate to add additional views where they support the general aspirations of the Area Action Plan. The reasoning behind the removal of views was generally either that they were outside of the borough and therefore out of the control of the council or otherwise the impact of new development had removed the need to protect a view. Views 10 & 11 (White Horse Bridge Great Central Way) are essentially slight revisions of previous views – WEM 19 Short Distance Views 1 and 4 respectively. Views Down Olympic Way (7 & 8) were included due to the importance of the processional nature of the route and that they have already been used in order to assess the impact of subsequently approved development. Views 4 & 9 (Welsh Harp and Chalkhill Park) were added due to the impact of the stadium views and its role as an important landscape feature within the boroughs public open spaces.

			<p>Proposed change to 4.67 for clarity:</p> <p><del>Brent's UDP (2004)</del>  <del>4.67 Policies BE34, WEM18 and WEM19 of the UDP</del> The council will therefore <del>seek to</del> protect a range of short, middle and long distance views of the National Stadium. <del>Although the initial assessment was based on the original stadium, the protection of such views extends to the new stadium.</del> A fundamental element of the development of a Strategy for Tall Buildings for Wembley was the evaluation of the views set out in the UDP. The study recommended the removal, retention and addition of a number of important views that will need to be considered as part of any application for tall buildings.</p>
Westminster City Council	WEM6	<p>Westminster support the principle of view protection, and note the importance of co-operation between neighbouring boroughs to ensure that views are effectively safeguarded. We consider that views of landmark buildings are of particular value and have proven to be an important part of local identity and place making in Westminster.</p> <p>In the case of Wembley, we do not consider that the development of tall buildings in Westminster would be likely to have an impact on the most of proposed protected stadium views.</p> <p>Tall buildings in Westminster, particularly in Paddington, may well be visible in protected view 2 (Elmwood Park), appearing in the background of the view. While much of the available development land in Paddington has already been redeveloped</p>	Support Noted

		or consented, sites in Paddington continue to come forward for redevelopment. Very tall buildings in this area are unlikely to be acceptable given our Core Strategy policy on tall buildings however.	
QARA	WEM6	These views are too general; need specific locations – perhaps referred to as appendices or other document. ADD “views from the top of Barn Hill open Space across and into Central London will also be protected”	Maps 4.3 and 4.4 identify specific locations where views will be protected. It is not considered to be possible to protect all views into central London without significantly constraining regeneration of Wembley.
QARA	WEM7	ADD “use of “sunken tiered terraces” to provide hidden panoramas without affecting the view / outlook of and from the Stadium”.	Amend para 4.69 to read: The principle of creating a number of smaller pocket spaces <u>flanked with lower level building projections</u> along the route has been firmly established by the Wembley Masterplan and subsequent approval of the Quintain North West Lands development. This will create a series of <del>unique</del> spaces with a more intimate, human scale containing a range of soft landscaping, water and lighting, as well as dedicated spaces for performance, public art and seating that will encourage people to meet, dwell and socialise. In order to establish a rigorous and consistent design approach, any proposed development flanking Olympic Way must seek to incorporate complementary pocket spaces, or otherwise demonstrate how it successfully contributes to significantly enhancing the public realm.  Add new para after 4.69: <u>In line with policies WEM5 and WEM6, proposals for tall buildings must demonstrate that they have no</u>

			<u>adverse visual impacts on views of the stadium from Olympic Way.</u>
GLA	WEM7	Agree with approach adopted	Support Noted
Wembley Stadium (FA Group)	WEM7	In particular, we support your proposed policy WEM 7 with regards to the character of Olympic Way where you state the Council will seek active ground floor uses either side of Olympic Way that can be appropriately managed on Event Days. We note that you have not taken forward the alternative option for UD4 that sought to "Review and Strengthen the design code for Olympic Way" where you concluded that this level of design detail was not considered to be appropriate for an Area Action Plan. We would like to emphasise however that Olympic Way and the access to it from the Stadium using both the ramps and street level form an essential part of the Stadium egress plans for normal and emergency egress and that the statutory requirements of licensing for sport and concert events must be fully considered and taken account of as part of any future urban design proposal for Olympic Way and for the adjacent development.	<p>This is acknowledged in changes to para 6.35:</p> <p>The council <del>considers that</del> <u>supports</u> the removal of the <del>pedway</del> <u>pedestrian ramp</u> and its replacement with an improved access arrangement between Olympic Way and the Stadium <del>would greatly enhance the southern part of Olympic Way and address</del> <u>remove what is currently a poor street environment. It would be supportive of the removal of the pedestrian ramps whilst ensuring providing that access to the Stadium and emergency egress are integral to the design, remains adequate and any changes help address what is currently a poor street environment.</u></p>
Brent	WEM7	Addition in order to better reflect policy direction in supporting text. Deletion repeats policy elsewhere in the AAP.	<p>Proposed Development on Olympic Way must be carefully designed and scaled to respect the predominance of Wembley Stadium and its arch. <del>Proposals for tall buildings must demonstrate that they have no adverse visual impacts on views of the stadium from Olympic Way.</del></p> <p>The council will seek active ground floor uses either side of Olympic Way that can be appropriately</p>

			<p>managed on Event Days.</p> <p><u>Development flanking Olympic Way will be expected to incorporate pocket spaces</u></p>
GLA	WEM8	Agree with approach adopted	Support Noted
Quintain	WEM8	WEM8 requires detailed specifications to be submitted with all major applications (comprising more than 10 units). This is not a requirement of the planning regulations and therefore we would ask that this policy is revised or withdrawn.	<p>Change to supporting text and WEM8 to clarify position:</p> <p><b>Securing <u>Quality</u> Design <u>Materials</u> <del>Quality</del></b></p> <p><u>The Council is responsible for achieving sustainable development; this includes the protection and enhancement of the borough's built environment over the long term. Pressures on the economic viability of development can result in aspects of design coming under threat during a downturn, including quality of building materials and finishes. However, it is important that the whole life costs of a development are considered and design solutions interrogated to ensure that limited resources are targeted to their best effect.</u></p> <p><u>The appropriate choice of materials is an important element of sustainable development and can result in an improved built environment, greater energy efficiency, less pollution and a range of other social and ecological benefits. There is also a considerable amount of research that highlights the economic benefits of high quality design, such as increased market attractiveness, higher rent and capital values.</u></p>

		<p>4.70 High quality design <del>should be</del> <u>is a fundamental</u> <del>a</del> <u>integral part of the vision for Wembley scheme development and, as such, should be built early on</u> into all budgetary projections. <u>This is particularly important for the more expensive elements of a scheme, such as façade materials and the amount of space and attention given to landscaping. A good building design is often a function of the materials specified for construction. All buildings, to a greater or lesser extent, are a function of their construction detail.</u> The choice of materials is second only to the way their connections and junctions are detailed. Such a choice should be a fundamental consideration of the development of a design proposal for a building.</p> <p>4.71 All too often, the quality of materials used in the final build out of development is reduced significantly <u>for reasons of cost after planning permission has been granted and in many cases this has adversely affected the quality of the development.</u> The 2009 Masterplan aspires to secure quality detailing at an early stage of the design process in order to avoid such 'value engineering'. <del>Brent Council welcomes examples of the quality and type of materials proposed at the time of application.</del> <u>Therefore detailed specifications of the primary materials suite, including façade materials, fixings and junctions between materials, should be submitted as part of a planning application for major developments (10+</u></p>
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			<p><u>residential units or 1000m2). and it should not be assumed that the choice can be made at a later date.</u> It is recognised that developers may need to seek <u>approval for alternative high quality materials after planning permission is granted.</u></p> <p><del>4.72 The council encourages the provision of information on the quality of details as part of planning submissions, to illustrate and promote the overall design theme. Securing detailed specifications as part of the planning consent would give all parties the confidence that the quality of the final buildings would remain high.</del></p> <p><u>Design guidance in the form of supplementary planning documents has been prepared for a number of locations across the Plan area. Where applicable, design proposals should have regard to the Wembley Masterplan, Wembley Link, Wembley West End (South) and Brent Town Hall SPDs.</u></p> <p><b>WEM 8</b> Securing Design Quality The Council will <del>require</del> <u>expect details the submission of the primary materials suite detailed specifications to be submitted</u> as part of all major applications within the AAP area.</p>
QARA	WEM8	Define "major" here or elsewhere	Agreed.

			<p>Addition to para 4.71:</p> <p><u>...Therefore detailed specifications of the primary materials suite, including façade materials, fixings and junctions between materials, should be submitted as part of a planning application for major developments (10+ residential units or 1000m2)....</u></p>
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#### Chapter 5: Business, Industry and Waste

Representor	Policy	Comment	Response
Brent Campaign Against Climate Change	Ch.5	We propose the creation of a Green Enterprise zone in the area with a concerted effort by Brent Council, in conjunction with the College of North West London, to bring green training, apprenticeship and jobs into the area. At present aside from the building jobs associated with regeneration there is an over dependence on the creation of jobs in retail and leisure. Green jobs would make a significant contribution to the upskilling of the Brent labour force.	Brent may be prepared to support. More detail on 'green enterprise zone' and 'green jobs' needed.
Quintain	5.1	We welcome the reference to policy CP20 within paragraph 5.1 but would ask, for the avoidance of doubt, that the wording replicates that of CP20 and refers specifically to the various uses, including sui generic uses that are closely related to industrial employment uses appropriate within Strategic Industrial Land. We would ask that this clarification is set out in W29 – Second Way, also.	<p>Agree:</p> <p>Suggested change to 5.1:            "...London Plan policy is reflected by policy CP20 of Brent's Core Strategy which <del>promotes</del> <u>protects</u> SILs for industrial employment <del>and closely related uses</del> <u>characterised by use classes B1, B2 and B8, or Sui Generic uses that are closely related.</u>"</p> <p>Suggested change to W29 (in light of proposed change</p>



			<p>from PIL to IBP): The site is considered suitable for <u>uses in line with CP20 including offices, light industrial and higher value general industrial, utility and transport functions, wholesale markets, small scale distribution and Sui</u> Generic uses that are closely related <u>offices, light industry, storage and distribution, some transport related functions, utilities and wholesale markets</u>. Given the proximity of potential residential uses on First Way, the site is not considered suitable for long term occupation by waste management uses, <u>including aggregate storage and transfer</u>. The relocation of such <u>uses to the Preferred Industrial Location (PIL) north and east of Fourth Way will be encouraged</u>.</p> <p>Suggested change to para 16.5 This site is in a SIL and <u>currently designated as a Preferred Industrial Location (PIL) in the London Plan. The council is proposing a change of designation to Industrial Business Park which is more in keeping with its location adjacent to a non-industrial area of regeneration. It is also designated as a business park</u>. The proposed uses are compatible with <u>these this</u> designations.</p> <p>Remove business park designation from Map 5.1.</p>
Costco	5.1	Costco welcomes the recognition within paragraph 5.1 of the WAAP that policy CP20 of Brent's Core Strategy promotes SIL for industrial employment and closely related uses. Core Strategy Policy CP20 specifically refers to "closely related sui generis uses". We request that specific reference is made	<p>Agree: Suggested change to 5.1: "...London Plan policy is reflected by policy CP20 of Brent's Core Strategy which <del>promotes</del> <u>protects</u> SILs for industrial employment <del>and closely related uses</del> <u>characterised by use classes B1, B2 and B8, or Sui</u></p>

		within paragraph 5.1 to closely related sui generis uses in accordance with the Core Strategy.	<u>Generic uses that are closely related.”</u>
Quintain	5.2	There is reference in paragraph 5.2 to a Joint Waste Plan having been prepared with other London Boroughs. Given that the Stage 1 Development Area is the first site within the UK where the Envac vacuum waste disposal system has been installed, entirely without Government or local funding, we wish to review this report to determine how it fits with the waste strategy for the regeneration of the Comprehensive Development Area where our majority landholdings are located and which are the focus of our regeneration work.	<p>The draft West London Waste Plan (WLWP) can be viewed here: <a href="http://www.wlwp.net/">http://www.wlwp.net/</a></p> <p>The WLWP is yet to be submitted for examination. There will be further opportunity to comment on the Waste Plan separately when it is published prior to submission.</p>
Quintain	Ch.5 Strategic Industrial Locations	The Policy for Strategic Industrial Locations appears to be missing from page 38 although the ‘ <i>Alternative Options not Selected</i> ’ is included. We wish to review and comment on the proposed policy when it is made available.	<p>The policy for Strategic Industrial Locations (SIL) is Core Strategy CP20 which is referred to in para 5.9. It is considered unnecessary to repeat this policy in the WAAP.</p> <p>Proposed changes to the current SIL boundary will be included in Map 5.1. Detailed changes to the Policy (Proposals) Map will be included as an appendix. These will be signposted in para 5.10.</p>
QARA	Para 5.6	Delete “may be” ADD “is”.	<p>Accepted.</p> <p>The level of waste management undertaken in the industrial area has also increased and <del>may be</del> <u>is</u> reaching a level where it is impacting upon Wembley’s regeneration prospects.</p>
GLA	Map 5.1 WEM9	GLA support minor amendments to the SIL boundary at Wembley in principle but a high resolution map showing the detail of the boundaries will be required for our records.	Proposed changes to the current SIL boundary will be included in Map 5.1. Detailed changes to the Policy (Proposals) Map will be included as an appendix.
Carey Group Plc	5.1-5.9 and	In summary, we consider that the Council should re-	Partially agree.

	Map 5.1	<p>examine the SIL boundary and release further land, including the Racal Site which is located right at its edge adjoining the Eastern Lands, in order to better facilitate economic development within the area. The Council should also seek to adopt a more flexible approach to the use of the remaining land within the SIL to maximise economic benefits and job creation.</p>	<p>In terms of the release of further land, this is discussed on p 38 of the AAP in the 'alternative options not selected' box. The London Plan identifies Brent for limited release of industrial land (policy 4.4 and map 4.1). It is not appropriate, therefore for de-designation of SIL to extend significantly eastwards as suggested with the Racal site. The AAP proposes de-designating 2.4 ha from the SIL which seeks to balance the protection of industrial land (London Plan 2.17 and Core Strategy CP20) with future development of the Wembley growth area. (CP7). This is supported by the evidence document: Economic Development and Employment Land in Wembley.</p> <p>In terms of flexibility of uses; the proposed changes to 5.1 (see above) seek to better align appropriate uses in the SIL with Core Strategy policy CP20.</p> <p>The council is also proposing a change to part of the SIL area currently designated as a Preferred Industrial Location (PIL). We will work with the GLA to re-designate land in the west of the SIL (identified as Wembley Eastern Lands in the AAP) to an Industrial Business Park (IBP), through the London Plan review process. This designation is still part of the SIL but offers more of a buffer between non-industrial uses proposed for the Comprehensive Development Area and the PIL.</p> <p>Change to para 5.9: It is proposed that the SIL area will be reduced slightly to the new boundary as shown on the extract from the</p>
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			<p>Proposals Map above. <u>In addition, the council will work with the GLA to re-designate part of the SIL from Preferred Industrial Location (PIL) to Industrial Business Park (IBP) (shown on Map 5.1). While PILs are suitable for uses including general industrial, storage and distribution, waste management and recycling, IBPs are suitable for activities that need better quality surroundings including research and development and light industrial. This will create a buffer zone between the non-industrial uses proposed for the Comprehensive Development Area and the SIL. The London Plan definitions of PIL and IBP, including appropriate uses, are set out in Appendix B. Planning policy towards proposals for Development within the SIL will be subject to London Plan policy 2.17 and Brent's Core Strategy policy CP20 together with policy WEM8 for Wembley Stadium Business Park set out below.</u></p> <p>Add to Appendix B Glossary:</p> <p>Industrial Business Park (IBP) Strategic Industrial Locations that are particularly suitable for activities that need better quality surroundings including research and development, light industrial and higher value general industrial, some waste management, utility and transport functions, wholesale markets and small scale distribution. They can be accommodated next to environmentally sensitive uses.</p> <p>Preferred Industrial Location (PIL) Strategic Industrial Locations that are particularly suitable for general industrial, light industrial, storage and distribution, waste management, recycling, some transport related</p>
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			functions, utilities, wholesale markets and other industrial related activities.
Quintain and GLA	5.9	<p>In paragraph 5.9 there appears to be an erroneous reference to WEM8 instead of WEM9.</p> <p>Paragraph 5.9 references policy WEM 8 in the document this is policy WEM 9</p>	Agree. Reference will be corrected.
QARA	5.10 WEM9	para 5.10 and (WEM 9) – the maps or extracts that are here referred should be specifically cross referenced to say “fig ?, page ?”.	It is proposed that the paragraph be deleted.
Carey Group Plc	5.10, Policy WEM 9 and Map 5.1	In summary, we consider that the Council should adopt a more flexible approach to uses within the Business Park and extend this area eastward to maximise the potential to improve the townscape and public realm along the Stadium Access Corridor and also the area around the River Brent.	<p>In light of the council’s proposal to re-designate part of the SIL to an Industrial Business Park, including the area currently designated as a Business Park in the UDP, and the Strategic Cultural Area which is designated in the London Plan, it is felt that the Business Park designation is no longer necessary.</p> <p>The area covered by the current Business Park will therefore be divided into the eastern section currently in the SIL and the western section adjacent to the Stadium.</p> <p>The council will seek re-designation of the eastern section (which is Site Proposal W29) from Preferred Industrial Location (PIL) to Industrial Business Park (IBP) through the London Plan review process. The proposed changes to Site Proposal W29 incorporate the land use principles for an Industrial Business Park. This reflects the site’s location and purpose to provide a buffer zone between the non-industrial uses proposed for the Comprehensive Development Area and the PIL. (See response to Quintain on para 5.1 above)</p>

			<p>The western section will fall within the Strategic Cultural Area within which major leisure, tourism and cultural uses are encouraged. Mixed use development is also appropriate in this area. This is addressed in policy WEM27 and in individual Site Proposals.</p> <p>Changes to para 5.10 and WEM9:</p> <p><del>Wembley Stadium Business Park</del>  5.10 Although little business (B1) development has come forward since the business park designation was established in the UDP 2004, it remains a good option for promoting regenerative development of run down parts of the industrial estate. In this way modern premises can be provided which can boost job generation locally as well as improving the environment and townscape on the main access route to the Stadium and to Wembley City. It is now considered, however, that a more realistic designation is that shown on the Proposals Map extract below. This reduces the area to that bounded by First Way and Fourth Way, and allows for more general industrial, distribution and open storage or waste management uses to locate to the north and east. Not only are waste management uses considered incompatible with business park development but their potential impact upon regeneration can be minimised by limiting them to the estate further away from key regeneration sites. It is, therefore, appropriate to limit such uses within the area designated as business park.</p> <p>WEM-9</p>
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			<p><del>Wembley Stadium Business Park</del>  <del>Redevelopment for business use of the area east of the Stadium, as shown on the Proposals Map, will be encouraged.</del>  <del>Development attracting large numbers of trips should contribute towards transport improvements appropriate to the scale of the proposed development.</del>  <del>Development for waste management, and related uses such as aggregate storage and transfer, will not be appropriate in this area. The relocation of such uses from within the business park area will be encouraged.</del></p>
Quintain	Map 5.1	Map 5.1 on page 39 identifies Wembley Retail Park as a good location for offices but elsewhere the strategy is clearly to bring forward housing on this site around a new park. In particular, the Map appears to be contrary to statements in paragraphs 4.31 and 4.37 and the anticipated school provision on site W18. We ask that Map 5.1 is amended accordingly.	Agree. Amend map 5.1 to better reflect site proposal uses.
GLA	WEM9	Preferred option WEM9 on pg 40. This option suggests that some waste management capacity may be lost on the Wembley Stadium Business Park. LP 5.17F states Boroughs in preparing their LDF documents must allocate sufficient land for waste management to provide capacity to manage the tonnages of apportioned waste. Brent should confirm if any waste management capacity is proposed to be lost off-site, or if it is being moved to another part of the site. If for any reason an existing waste management site is lost to non-waste use, additional compensatory site provision is required in line with LP Policy 5.17H.	<p>There are two sites of waste management activity in the business park area. One has recently ceased operation whilst the other one has a temporary consent only. Overall the land area in waste management use in the area has increased substantially in recent years with the development of the Seneca operation in Hannah Close to the east.</p> <p>In addition, the council proposes re-designating land in the west of the SIL (identified as Wembley Eastern Lands in the AAP) from Preferred Industrial Location (PIL) to Industrial Business Park (IBP) through the London Plan review process. This re-designation will help provide a buffer between non-industrial uses</p>

			<p>proposed for the Comprehensive Development Area and the SIL. The proposed area for re-designation will be shown on Map 5.1 and in detail in the Appendix.</p> <p>In light of the above WEM9 has been deleted. Site Proposal W29 has been changed to reflect the GLA's comments.</p> <p>Suggested change to W29: The site is considered suitable for <u>uses in line with CP20 including offices, light industrial and higher value general industrial, utility and transport functions, wholesale markets, small scale distribution and sui generic uses that are closely related</u> <del>offices, light industry, storage and distribution, some transport related functions, utilities and wholesale markets</del>. Given the proximity of potential residential uses on First Way, the site is not considered suitable for long term occupation by waste management uses, <u>including aggregate storage and transfer</u>. The relocation of such <u>uses to the Preferred Industrial Location (PIL) north and east of Fourth Way will be encouraged</u>.</p>
Brent Campaign Against Climate Change	WEM9	<p>We are in favour of strict controls on waste management and processing sites in the entire area, rather than the limited area proposed. We would also favour relocation where that is possible. The events over the summer regarding the Seneca MRF and the 'Wembley stink' should serve as a warning for the future. The Neasden/Wembley area already suffers from severe air pollution problems with school pupils particularly at risk because of the impact of air pollution on their smaller lungs. Chalkhill Primary, St Margaret Clitherow Primary,</p>	<p>While waste management is an appropriate use in SILs, the Joint West London Waste Plan does not identify any sites for the borough in addition to those currently in use.</p> <p>Propose additional sentence after 10.7:</p> <p><u>The whole of the AAP area is an Air Quality Management Area (AQMA). Any proposals for new development will have to comply with London Plan policy 7.14: Improving Air Quality which seeks to</u></p>



		Northview Primary, Oakington Manor Primary and the proposed new Wembley Stadium Primary in Fulton Road are all in the vicinity. Older people also suffer disproportionately from respiratory problems	<u>minimise increased exposure to existing poor air quality and make provision to address local problems of air quality, particularly within AQMAs.</u>
Quintain	WEM9	Wembley Stadium Business Park comprises two sites as defined within the Site Proposals sections 12-16 of the AAP Preferred Options, namely W28 First Way within Wembley Eastern Lands and W29 Second Way within Wembley Industrial Estate. WEM9 deals with Wembley Stadium Business Park and appears to promote solely business uses in this location whereas the permitted site proposals for the W28 includes for mixed uses, including residential. We believe WEM9 should be clarified in this regard with a statement confirming that the sites closest to the Stadium would support mixed uses, including residential.	<p>Agree.</p> <p>A strategic map will clarify which uses, including mixed uses, are appropriate where. This will include the addition of policy areas including the Strategic Cultural Area and a proposed change to the western part of the SIL to an Industrial Business Park designation.</p> <p>The Business Park designation is no longer necessary and WEM9 has been deleted.</p> <p>Add sentence to Site Proposals W14, W15, W16, W17, W19, W26, W27, W28: <u>This site lies within the Strategic Cultural Area where leisure, tourism and cultural uses are particularly encouraged.</u></p>
QARA	5.12	2 years appears too long a time – suggest 1 year. (What is the basis of 2 years ?).	Two years is established policy as set out in the UDP. Short term vacancies can extend to up to a year whilst 2 years is considered to be sufficient to demonstrate a longer term problem
QARA	WEM10 Para 5.12	Definition of “alternative uses” and “medium term” needs defining	Examples of appropriate alternative uses are set out in para 5.12. Alternative uses will be considered on a site by site basis in light of planning policies both within the AAP and the development plan as a whole. It is not appropriate to repeat these here.

			Medium term is generally understood to be 2-10 years, and this is reflected in the requirement to demonstrate a lack of demand for office occupation for two years.
Quintain	WEM11	WEM11 states that low cost business space will be encouraged as part of major mixed use development. This will have an impact on viability and thus will have an impact on Section 106 obligations, after CIL. We consider that this should be stated in the document.	<p>This policy is in line with CP20 which states “Redevelopment [in SILs] will be expected to: Provide new employment floor space that is fit for modern usage for a range of B use classes including business parks, ‘starter’ and ‘move on’ units for small and medium enterprises, and studios for artists and cultural and creative industries.” This is supported by Brent Employment Land Demand Study (2006).</p> <p>New paras in strategic chapter as follows:</p> <p><u>Priorities for Investment</u>  <u>Priorities for infrastructure investment in the Wembley Growth Area include open space, play facilities, accessibility and cycling routes, wildlife enhancements, health, schools and community facilities. These are set out in the council’s Infrastructure and Investment Framework (IIF). This document is subject to regular review.</u></p> <p><u>The AAP also sets out priorities for developer contributions, appropriate to the scale of the proposed development. Essential requirements include flood mitigation, transport improvements and affordable housing. Developers will also be encouraged to provide low-cost business start-ups, public realm improvements, public art, and connection to a decentralised energy system.</u></p> <p><u>Delivery of these investment priorities is dependent on</u></p>

			<u>resources and viability. Infrastructure will be delivered through the Community Infrastructure Levy and the IIF includes opportunities for funding sources to complement developer contributions. The council will work closely with delivery partners such as developers, Greater London Authority and Transport for London.</u>
QARA	WEM11	Define “business start ups” here or elsewhere.	<p>Agree.</p> <p>Change para 5.13: There are currently few sites or premises where low-cost space for <del>new</del> business start-ups (<u>ie new or emerging businesses</u>) is available. It is appropriate therefore, as an alternative to office-based employment, to encourage the provision of new low-cost space for business start-ups, subject to demand.</p>

#### Chapter 6: Transport

Representor	Policy	Comment	Response
Dr Anoop Shah	6.1	How have the parking policies been "modified" - more or less car parking? How much cycle parking has been specified? It is important that large blocks of flats have enough cycle parking space.	In general, the proposed standards provide slightly less parking than the current UDP standards (see Wembley Standards Report p25 for further details). The proposed standards are in line with the London Plan in terms of cycle parking provision; within new residential developments this requires 1 cycle parking space per 1 to 2 bedroom dwelling, and 2 cycle parking spaces per 3+ bedroom dwelling. In addition, 1 cycle parking space per 40 units is required for visitors.
Brent Cyclists	6.1	Brent Cyclists welcomes the aim of encouraging a move to sustainable transport modes and reducing the need to travel by private car. We would caution against application of very low car parking	Brent has a policy of responding positively to requests from our stakeholders including cycling groups, the public and others, for improved cycling infrastructure.

		standards, in fact, since these do not actually prevent people acquiring more cars than there is room for, and storing them inconsiderately and obstructively on streets. This phenomenon has been witnessed before in recent new developments in Brent (e.g. Princes Square in Queensbury), where low parking standards have been applied, on an assumption of low car ownership, and public space has just become clogged with cars, including parking on pavements, because alternatives to the car have not been made attractive enough, and there are not the resources (or political will) to prevent obstructive parking. The unintended consequence of having low parking standards then is a worse walking and cycling environment.	In respect of low parking standards leading to cars being parked where it is inappropriate, it is accepted that a policy of car restraint should be accompanied by improvements to ensure that other modes of travel more attractive.
Brent Cyclists	6.2	We support this, and need to point out that encouragement of the integration of rail and cycling is one of the best ways in which "links between the stations and strategic leisure facilities can be improved". This means not only adequate cycle parking, but high-quality cycle routes built into the redeveloped environment from the start, using international best practice for cycle infrastructure, seamlessly linked to the public transport hubs.	Support noted, our strategy for cycling is outlined later in Chapter 6.
Quintain	6.3	Paragraph 6.3, Strategic Objective 8 and the 'Transport' objective at paragraph 17.5 set out the ambition to reduce the modal share of car trips from 37% towards 24%. In order to avoid confusion, we ask that this is adjusted to replicate the adopted Core Strategy which sets the lower baseline at 25%. Notwithstanding the adjustments	Agree, change to 25%.  6.3:..... A specific aim for Wembley is to reduce modal share of car trips from 37% towards <del>24%</del> <u>25%</u> .  Outcomes of travel plan monitoring will be used as the primary source to assess how well this target is met. The

		to the Core Strategy at Examination it is still not clear how the reduction in modal share is to be measured. We ask that this is clarified so that the validity of this measure can be fully considered and commented upon and, if appropriate, specific action can be taken towards the 25% goal.	traffic model for Wembley is being updated at present, and it may be feasible to use model outputs to supplement the use of travel plans for monitoring of this mode share target in future .
Brent Cyclists	6.3	# funnelling all traffic on to a small number of main road crossings, where space for cycling and walking is insufficient and unpleasant. These barriers also create motor vehicle congestion, and make use of foot and bike less practical by making journeys unnecessarily long. It is vital in the first instance, at the, very least, to provide new, high-quality pedestrian and cycle crossings of the Chiltern Line, to the south of the area, and the Metropolitan Line, to the east of the area, BEFORE extensive redevelopment of the area cements-in car-centric patterns of movement because the alternatives remain too unpleasant.	<p>The WAAP proposes a pedestrian/cycle bridge crossing over the Metropolitan line.</p> <p>A study into different options for bridge locations in Wembley commissioned by the council showed that the Chiltern line crossing by South Way would be of only local benefit. Improvements for cycling through Brent River Park and improved connectivity through the main development area to the west of the Stadium will help overcome barriers from the railway. We believe these routes offer sufficient north-south connectivity with Tokyngton and Stonebridge to the south, and link in with the wider Greenway routes.</p>
Wembley Stadium (FA Group)	6.3	We note that one of the main objectives in Brent's Core Strategy is that access by public transport, bicycle and on foot should be promoted and car parking standards reduced in Growth Areas because of their relative accessibility. A specific aim for Wembley is to reduce the mode share of car trips from 37% down towards 25%. Wembley Stadium welcomes this approach as part of managing the predicted traffic impact for the wider area that will be generated from delivering growth.	Support welcomed

QARA	6.3	ADD “ the use of motor cycles and scooters will also be promoted” .	Disagree. Although the council has no formal view, in general motorcycles and scooters are considered private forms of motorised transport. They do not provide the benefits that result from walking, cycling and the use of public transport and as such should neither be promoted nor discouraged.
Dr Anoop Shah	6.4	All new roads and junctions should be built with Dutch-style high quality cycle facilities, because this is the only way to encourage large numbers of people to cycle. Specifically this means segregated cycle paths along busy roads, and segregation at major junctions. The Mayor has committed to improving cycle infrastructure in London and may be willing to invest in boroughs that are most enthusiastic about building Dutch-style infrastructure.	Disagree with suggestion. Refer to cycle/walking section for how these users will be considered in new and improved junctions. A study on cycling across West London is underway and will help inform the development of cycle routes in Brent which are consistent with our neighbours
Brent Cyclists	6.4	New road connections and junction improvements must have built into them the facilitation of a safe and attractive environment for cycling. Consideration should be given to the construction of contraflow cycle tracks or lanes on one-way roads. This may be better than converting such roads to two-way motor vehicle operation, from the point of view of effecting modal shift away from cars, this being a stated objective. It needs to be recognised that cycling needs to be made MORE CONVENIENT than driving, as well as objectively and subjectively safe, if a modal shift towards it is to be achieved. This document does not give the impression that this understanding is present.	Agree with principle, refer to cycle/walking section for how these users will be considered in new and improved junctions. Routes will be considered which are fit for purpose for cyclists, and opportunities sought for removing through traffic from in appropriate routes – this will improve the environment for cyclists
Wembley Stadium (FA Group)	6.4	We strongly support the need for these junction improvements to be implemented as part of	Support welcomed. The Council will continue to tailor the junction improvements to ensure that benefits for car

		helping to deliver a more consistent and reliable journey to and from the Stadium by car and coach for our customers who are allocated the use of these modes of transport as part of our overall transport plan. More than 80% of our customers use public transport for access to and from the stadium but for those who use surface transport by car and coach we have an important need to improve their journey to and from the Stadium.	users are realised, as well as benefits for non car users.
Brent Cyclists	6.5	Orbital transport links in north-west London generally are lamentable, and there is a clear need for a rail or tram-type link on a similar trajectory to the North Circular Road. But there is also a clear need for cycle routes that actually work. These have huge potential to improve orbital transport and connections between the local town centres, but they require serious engineering, not a few lines or signs on pre-existing pavements. This type of third-class cycle facility (as we have on parts of the North Circular Road pavement at the moment) has a record of failure, and should not be reproduced.	<p>We recognise the need to improve transport links and actively engage TfL for improvements to orbital transport such as our support for the introduction of a London Overground service between Brent Cross and Hounslow on the Dudding Hill Freight line. A potential stop at Neasden would improve orbital connections from Wembley Park. Opportunities will also be taken to provide convenient crossing points for the North Circular for pedestrians and cyclists</p> <p>We also recognise the need for dedicated cycle infrastructure to facilitate a step change in cycling and recognise its potential to improve orbital connections.</p>
TfL	6.6 WEM12	There is also work being undertaken by London Rail to explore options for links between Old Oak Common and Brent Cross via the Dudding Hill line in relation to the development of Old Oak Common interchange station between High Speed Rail 2 (HS2) and Crossrail.	<p>Agree. Refer to TfL work on Old Oak Common and Dudding Hill Rail link:</p> <p><u>[New para after 6.25] There is currently work being undertaken by Transport for London Rail to explore options for links between Old Oak Common and Brent Cross via the Dudding Hill line in relation to the development of Old Oak Common interchange station between High Speed Rail 2 (HS2) and Crossrail. A station could potentially be located at Neasden providing interchange with the Jubilee line. In addition, Transport</u></p>

			<u>for London and Network Rail are exploring the potential from some Crossrail services to run from Old Oak Common onto the West Coast Mainline and onwards to Hertfordshire and beyond. These services would likely call at Wembley Central.</u>
TfL	6.6 6.7	<p>Not all of the Wembley area boundaries are identified to benefit from a PTAL of 6. The AAP should include the range of PTALs which will then assist in identifying what may be required in terms of improving public transport and access, along with the required infrastructure needs.</p> <p>TfL notes that paragraph 6.7 is contradicting previous statements. It refers to poor accessibility as opposed to paragraph 6.6 which states that the area has high PTALs scores.</p> <p>The PTAL to the east of the site may be lower but this does not mean that public transport provision is poor as there are several bus routes that serve the east, 18, 92, 182, 204 and H17. There is the Jubilee and the Metropolitan lines which also operate through Wembley Park station in the east and mainline line to Marylebone from Wembley Stadium station.</p>	<p>Agree: reword 6.6 When the level of bus services is added, the area has a Public Transport Accessibility Level (PTAL) of up to 6 (out of 6) <del>which means it is one of the most accessible locations in London.</del> <u>However, the PTAL for the Wembley Area decreases towards the east with a PTAL of 1 or 2 in the Eastern Lands and Industrial Estate.</u></p> <p>Agree, but rewording of above helps this.</p> <p>Disagree. Public transport provision is poor. The only bus routes to serve this area are the 92 and 206. Rail and underground stations are a considerable walk from this area. As a result PTAL to the east of the Stadium is 1b – 2, typically referred to as ‘poor’ or ‘very poor’.</p>
Brent Cyclists	6.6	The statement "Wembley is a generally well connected area" is true for radial rail journeys in London, but for no other form of transport. It is	<p>Reword 6.6 to recognise poor sustainable links: 6.6 Wembley is a generally well connected area, particularly by public transport <u>and radial links to Central</u></p>



		massively untrue for the truly sustainable modes, walking and cycling, from the viewpoint of which Wembley is thoroughly disconnected from the rest of the Borough of Brent, let alone the rest of London. The scale of this problem needs to be appreciated. The connections just do not exist, and must be created as a top priority before moving a large number of new homes, jobs and leisure facilities into the area.	<u>London. Wembley is served by with connections from the Metropolitan and Jubilee lines at Wembley Park, the Chiltern line at Wembley Stadium station, and from London Overground and the Bakerloo line at Wembley Central, all of which provide key access gateways into Wembley for public transport users. Orbital links are primarily provided by bus, of which a large number of routes pass through Wembley. However, walking and cycling links within and from Wembley to the rest of Brent are either poor or non-existent. Largely due to the rail and underground links, Wembley can be thought of as a very sustainable location for major trip generating development (80% of events crowds choose to use public transport), but to support this, better pedestrian and cycle access will be sought in line with Brent's wider transport strategy..... continue with the TfL reword of 6.6.</u>
QARA	6.6	The true range of PTALs should be given not only the highest rating! (PTALs and their approximate % area with reference to the total "subject area).	Agree. Include PTAL map showing variation. Rewording to 6.6 (above)
Dr Anoop Shah	6.8	Brent is currently far too attractive to come to by car compared to cycling, so the balance needs to shift heavily in favour of walking and cycling. The only way to improve conditions for motorists is to enable people to cycle more easily and thus remove unnecessary traffic and congestion. The balance is not between different road "users" (as if they are separate people) but in creating a road environment which encourages people to choose walking and cycling for most short to medium length trips, and only to drive on the few occasions when it is necessary.	Amend 6.8:  ...Studies which have just been completed address some of these issues to reduce through traffic, improve the environment <del>for</del> <u>to encourage more</u> pedestrians, cyclists and public transport users, while providing convenient access for motor vehicles served by better located car parks....
Brent Cyclists	6.8	The statement "the approach... is one which	Amend 6.8:

		<p>balances the need to minimise car use whilst ensuring that the area is also attractive to those who wish to come by car" sounds self-contradictory. If the area is attractive to car-use, that will inevitably mean a less good environment for cycling, walking and public transport. There is a real choice to be made here, and it sounds like it will be fudged. While acknowledging that a level of motor access is essential, "improving" roads and junctions in such a way as to facilitate large volumes of through-traffic can only worsen the environment and increase traffic levels. Motor traffic in London expands to fill the space allocated to it. A more intelligent use of road space could facilitate a modal shift away from car use, but this will depend on detailed designs.</p>	<p>...The approach to facilitating the level of development <del>that has been estimated as likely to come forward in Wembley, therefore, is one which balances the need to</del> <u>minimise discourage car use by prioritising walking, cycling and public transport whilst ensuring that the area is also attractive accessible to traffic those who wish to come by car such as event-related coaches, emergency services, waste and delivery vehicles, and disabled drivers.</u></p>
Brent Cyclists	6.9	<p>Depending on "enhanced bus services" is unrealistic as a method of securing modal shift away from the private car. The attraction of the private car is its convenience and independence from timetables, and door-to-door operation. Over medium distances (1?4 miles), only cycling can compete with the private car as a realistic mode providing these advantages. Cycling is not, however, perceived as a realistic alternative by most people in Brent currently because of the poor subjective quality of the experience, with too much interaction with heavy and fast traffic, and poor road designs for cycling. This area provides the rare possibility of starting with a "clean sheet" to seriously change this. It should be taken advantage of, but there is little sign of this concept being well-developed at the moment.</p>	<p>Agreed, make reference to the role of sustainable modes in reducing reliance on car.</p> <p>Amend 6.9 ...Through the provision of enhanced bus services and facilities, <u>improvements to pedestrian and cycling infrastructure</u>, and the implementation...</p>

Brent Cyclists	6.10	We support all this, noting again that there is very limited space on these existing corridors. The need for new pedestrian and cycling only corridors, bridging the rail lines, is critical.	Support noted.
Quintain	6.11	Within paragraph 6.11 there is reference to a parking strategy and we comment further on the proposed parking standards below. We will comment further as necessary on the Parking Strategy once we have had the opportunity to review it.	Noted.
Brent Cyclists	6.11	It should be noted that small businesses usually have a very inaccurate idea of the modes of transport their customers use. It has been shown time and time again (see e.g. <a href="http://www.cycling-embassy.org.uk/sites/cycling-embassy.org.uk/files/documents/eev68.pdf">http://www.cycling-embassy.org.uk/sites/cycling-embassy.org.uk/files/documents/eev68.pdf</a> ) that shopkeepers always over-estimate the number of customers who come by car, and the amount they spend, and underestimate the importance to their business of those who do not come by car. Dedicating too much public space to car parking inhibits those who do not use cars from taking their custom to shops, and this does not do trade any good. The parking strategy should take this into account.	The point is accepted. The strategy is one which is seeking a modal shift away from the use of the car towards other modes. Car parking provision locally is low compared to strategic centres generally in London and will continue to be relatively low into the future.
QARA	6.11	The referenced parking strategy needs to be specifically cross referenced.	Agreed. Cross reference to be included.
Dr Anoop Shah	6.12	The key to reducing congestion is to increase walking and cycling, and this requires all road schemes to incorporate international best practice cycling and walking facilities from the outset, even if this slightly reduces motor traffic capacity.	Agreed that increased walking and cycling will assist in reducing congestion. Changes to Walking and Cycling section help emphasise best practice principles. Highway schemes will look to improve conditions for these modes especially along the Western Corridor, however

			international best practice will not always be possible with current funds available for transport improvements.
Brent Cyclists	6.12	There is no contradiction between viable town centres and low levels of traffic, in fact, there is a correlation. High levels of traffic damage the viability of town centres, as people do not wish to linger in this environment, particularly as such good on-line shopping possibilities exist now. The successful town centres of the future will be those that provide an enhanced social experience, which does mean limiting motor traffic, and free on-street car parking,	Points noted. It is accepted that high levels of traffic in High Streets detracts from the shopping experience.
Quintain	6.14	There is reference to a South Way study within paragraph 6.14 to discourage through-traffic to the Town Centre through the creation of a two-way circulation within the Industrial Estate as set out in WEM13. We are broadly supportive of this strategy subject to detailed review of the required land as identified in Appendix C (as amended). We would ask that it is made clear in the document where land has already been secured for these improvements, e.g. on the Kelaty House site, if appropriate.	<p>Agreed. With reference to the Kelaty House site, land has been identified in two alternative locations to assist with delivering the transport improvement within this area. Identification of the two portions of land gives greater flexibility for implementing the transport improvement. More detail of the land take required is included in site proposal W28.</p> <p>6.14</p> <p>A <u>Highways and Bridge</u> study has been completed which recommended <del>changes and improvements to South Way</del> the restoration of two way working to the Eastern Lands and Industrial estate gyratory to improve accessibility as development builds out. This will improve <del>car</del> access and movement within the Masterplan area <u>and to access stadium car parks</u>, but in a way which does not encourage <del>through-traffic through the existing Wembley town centre.</del> <u>A number of short stretches of land are required to deliver these improvements, and are shown in Appendix C.</u></p>

TfL	6.15	All work which is proposed towards improving highways involving any Transport for London Road Network (TLRN) or the Strategic Road Networks (SRN) will have to be consulted and approved by TfL.	<p>Add in para after 6.15: <u>Any improvements to the Transport for London Road Network (TLRN) or the Strategic Road Network (SRN) will have to be consulted and approved by TfL.</u></p> <p>Before 6.9:</p> <p><u>The Wembley Area Action Plan includes a small part of the Transport for London controlled North Circular Road (A406) which is part of the Transport for London Road Network (TLRN). The North Circular provides strategic highway access from Wembley particularly to the M25 and wider TLRN. The A404 (Harrow Road – High Road) is part of the Strategic Road Network (SRN) which TfL have a strategic interest over and, hence, will be consulted upon highway alterations. The rest of the roads in the Wembley Area Action Plan area are borough controlled roads.</u></p>
Quintain	6.15	We consider paragraph 6.15 to be misleading as currently drafted and ask that it is redrafted as set out below. The paragraph identifies a number of junctions, which are required to be improved. As you will be aware, the majority of these junctions have been identified as part of rigorous Environmental Assessments carried out to support our own planning applications for the Stage 1 Lands and the NW Lands. These assessments considered existing and anticipated future year flows with the development traffic overlaid. Appropriate mitigation has already been secured to address the impacts of all permitted developments together with the anticipated	<p>Accept that clarification is needed. Reword 6.15:</p> <p>A number of junctions have been identified as needing improvements to mitigate <del>against</del> the impacts of traffic generated by development to maintain highway reliability for existing users, including public transport users. <u>All</u> junction improvements will take into account the needs of pedestrians and cyclists, with these users <u>specifically</u> prioritised along the Western Highway Corridor, which runs from Forty Lane to Wembley High Road. The junction of Wembley Hill Road and Empire Way <u>was recently converted from a gyratory to a roundabout to provide a more attractive and easily accessible public space for the community</u> <del>has recently been improved.</del> <u>A number of</u></p>

	<p>growth in background flows and these improvements are capable of being delivered within the highway boundary or on land within our control. Similarly, the improvements to the Triangle junction and the South Way / Wembley Hill Road junction have been secured through the Outline Permission on site W6 (South Way surrounding Wembley Stadium Station) in favour of the London Development Agency, now the GLA. We would ask that these existing agreements are made clear as such together with any additional improvements anticipated to be required by the Council to mitigate against the impacts of further development identified in the Site Proposals sections of the AAP. These clarifications should be made to paragraphs 6.15 and 13.6. To that end, we ask that paragraph 6.15 is redrafted to read as follows:</p> <p><i>“A number of junctions have been identified as needing improvements to mitigate the impacts of traffic generated by development to maintain highway reliability for existing users, including public transport users. Junction improvements will take into account the needs of pedestrians and cyclists, particularly along the Western Highway Corridor, which runs from Forty Lane to Wembley High Road, whilst maintaining the Corridor’s capacity for vehicles. The junction of Wembley Hill Road and Empire Way has recently been improved and a number of junction improvements have been secured through existing Outline Planning Permissions. These are listed below together with other junction improvements to support future</i></p>	<p><u>junction improvements have been secured through existing Outline Planning Permissions. These are listed below together with other junction improvements to support future development not currently consented. The following junctions are expected to require improvement.</u> Where applicable, land take to undertake these improvements is identified on the proposals map at Appendix C. Potential improvements include:</p> <ul style="list-style-type: none"> <li>② Wembley Hill Road / Harrow Road / High Road – known as Wembley Triangle – <u>capacity improvements can be delivered within the public highway and this improvement has been secured through existing Outline Planning Permissions</u></li> <li>② Widening of the road bridge over the Chiltern Railway – <u>would support a junction improvement at Wembley Triangle which improves urban realm and condition for pedestrians and cyclists, land take required.</u></li> <li>② Wembley Hill Road / South Way – <u>capacity improvements and associated land take have been secured through an existing Outline Planning Permission. Additional land take for further enhancement is identified at Appendix C.</u></li> <li>② High Road / Park Lane</li> <li>② High Road / Ealing Road</li> <li>② Empire Way / Engineers Way - <u>capacity improvements have been secured through an existing Outline Planning Permission. Agreed land take is identified at Appendix C.</u></li> <li>② Empire Way / Fulton Road - <u>capacity improvements have been secured through an existing Outline Planning Permission. Agreed land take is identified at Appendix C.</u></li> <li>② Wembley Park Drive / Empire Way - <u>capacity improvements have been secured through an existing Outline Planning Permission. Agreed land take is</u></li> </ul>
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		<p><i>development not currently consented. Where applicable, land take to undertake these improvements is identified at Appendix C. Feasibility studies and detailed designs are required:</i></p> <p>☐ <i>Wembley Hill Road / Harrow Road / High Road – known as Wembley Triangle – capacity improvements can be delivered within the public highway and this improvement has been secured through existing Outline Planning Permissions</i></p> <p>☐ <i>Widening of the road bridge over the Chiltern Railway - land take</i></p> <p>☐ <i>Wembley Hill Road / South Way – capacity improvements and associated land take have been secured through an existing Outline Planning Permission. Additional land take for further enhancement is identified at Appendix C.</i></p> <p>☐ <i>High Road / Park Lane</i></p> <p>☐ <i>High Road / Ealing Road</i></p> <p>☐ <i>Empire Way / Engineers Way - capacity improvements have been secured through an existing Outline Planning Permission. Agreed land take is identified at Appendix C.</i></p> <p>☐ <i>Empire Way / Fulton Road - capacity improvements have been secured through an existing Outline Planning Permission. Agreed land take is identified at Appendix C.</i></p> <p>☐ <i>Wembley Park Drive / Empire Way - capacity improvements have been secured through an existing Outline Planning Permission. Agreed land take is identified at Appendix C.</i></p>	<p><u>identified at Appendix C.</u></p> <p>☐ <i>New junction between North End Road / Bridge Road – land take required</i></p> <p>☐ <i>Bridge Road / Forty Lane – Feasibility study required underway and a contribution for the junction improvement has been secured through an existing Outline Planning Permission.</i></p>
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Dr Anoop Shah	6.15	<p>All these junctions and road improvement schemes must prioritise pedestrian and cyclists safety and convenience from the outset, even if this results in slightly longer journey times for motorists. The only way to reduce congestion is to reduce traffic by encouraging active travel.</p>	<p>Agree. Highway schemes will look to improve conditions for pedestrians and cyclists especially along the Western Corridor. Encouraging active travel is a key component of the councils aim to reduce car mode share in Wembley.</p> <p>Changes to 6.8, 6.9 and Walking &amp; Cycling section reflect this.</p> <p>Addition to 6.15: ...<u>All</u> junction s improvements will take into account the needs of pedestrians and cyclists with these users <u>specifically</u> prioritised on the Western Highway Corridor...</p>
Brent Cyclists	6.15	<p>The possibility of land-take to improve roads is welcomed by us, as this would indicate that there should be no shortage of space to implement high-quality cycle lanes and tracks, separating cycling from both motor traffic and pedestrians. We would point planners to the London Cycling Campaign's "Go Dutch" principles (<a href="http://lcc.org.uk/pages/key-principles">http://lcc.org.uk/pages/key-principles</a>) as guidelines for the creation of a quality pedestrian and cycling environment that minimises conflict between road-users. Falling short of these we would not regard as "prioritisation" of cycling and walking on transport corridors.</p>	<p>Support welcomed.</p> <p>Changes to Walking and Cycling section provide more emphasis on reducing conflict between road users, including separate cycle lanes where appropriate.</p>



Wembley Stadium (FA Group)	6.15	The draft AAP goes on to state that "the junction of Wembley Hill Road and Empire Way has recently been improved". As we stated when we met with you, from our Stadium operations perspective the junction changes at Wembley Hill Road and Empire Way have seriously reduced the capacity of the traffic egress from the Stadium area after an event and this remains a concern that we need addressed as it is seriously impacting on our customers experience after an event, and thereby on our business.	Reference to improvement has been removed to in the updated 6.15.  The Council will continue to work to improve performance of the route for traffic approaching from Wembley Park along Empire Way.
Wembley Stadium (FA Group)	6.15	We were informed by Quintain that they objected to the introduction of the proposed junction works and you are aware of the reservations provided by the Stadium at the time of consultation but nevertheless these works were implemented as part of the London 2012 funded proposals. We would like an undertaking that Brent Council will re-implement the previous junction priority at the junction of Wembley Hill Road with Empire Way to address the serious traffic congestion that is now frequently experienced by our customers during Stadium egress.	The primary objective of the conversion of the Wembley Hill Road/Empire Way gyratory to a roundabout was to provide a more attractive and easily accessible public space for the community. So it is not proposed to re-introduce the gyratory system. However, the operation of the junction will be reviewed to enhance performance.
QARA	6.15	"Bridge Road / Forty Lane" – a detailed feasibility study has <u>already</u> been conducted and improvements to this road junction have been specified!	Disagree. As part of the NW Lands planning application an outline scheme was developed for this junction. Brent Council did not accept the proposal but accepted that improvements needed to be made. The council has accepted a contribution towards the junction improvement and is currently undertaking a feasibility study into how to accommodate increased highway capacity while taking into account the needs of pedestrians and cyclists.

Dr Anoop Shah	6.16	As above, these junction improvements must incorporate best practice for cyclist and pedestrian facilities even if it slightly reduces motor traffic capacity. Cycle paths should be segregated at major junctions and cyclists may require their own traffic light phase. People can only be encouraged to cycle by high-quality Dutch-style cycle routes.	No change required here, cycle/walking section emphasises improvements for cyclists and pedestrians.
Quintain	6.17	The following paragraph should also be added within paragraph 6.17: <i>"Where land outside of the highway boundary is sought for improvements the acquisition will be sought by agreement but Compulsory Purchase procedures may be utilised where it is considered necessary to address existing deficiencies and deliver the Council's Core Strategy objectives."</i>	Agreed. Add to end of 6.17 Plans showing the land.....Appendix C. <u>Where land outside of the highway boundary is sought for improvements the acquisition will be sought by agreement, but Compulsory Purchase procedures may be utilised where it is considered necessary to address existing deficiencies and deliver the Council's Core Strategy objectives.</u>
TfL	WEM13	TfL would support the principle of reverting the existing gyratory to two-way working, subject to the necessary modelling demonstrating this can be achieved without prejudicing other users of the highway e.g. bus operations and cyclist. There would need to be good permeability with access to cycle lanes and safe pedestrian routes.	Support welcomed. Add to end of WEM13 <u>Any improvements would need to be supported by modelling</u>
Quintain	WEM13 13.43	There is reference in WEM13 and again in relation to W14 (Arena House and Crescent House) on page 102 to the connection of North End Road to Bridge Road. We do not consider this connection to be justified to mitigate the impacts of development and instead it appears mainly to be based on a need to provide circulation to and from the Industrial Estate on Stadium Event Days (para 6.35). In any event, it is not required to mitigate	Disagree with suggested text change. A new road link at North End Road is a key component of the overall strategy enabling the promotion of highway access into Wembley (and beyond) from the North Circular. The MVA Transport Strategy Review (2008) stated that the link will benefit the whole development area during Stadium events. The link will help to reduce traffic along Neasden Lane and Forty Lane allowing prioritisation for non-car modes. The connection may also facilitate

		<p>the impacts of development currently consented in the regeneration area. We ask that this latter point is made clear and that the Council's justification is also set out for consideration. We also ask that the anticipated timing of the connection is clarified given the acknowledgement in paragraph 13.43 that the 1 Olympic Way site, is unlikely to be available in the medium term and therefore it should be clarified that this scheme is sought to be delivered on a phased basis. To that end, we ask that the final sentence of WEM13 is redrafted as follows:</p> <p><i>"A new road connection will be provided in the longer term from North End Road to Bridge Road to provide an alternative route through Wembley Park, particularly on Stadium Event Days."</i></p>	<p>improvements to bus services, depending on results of the Bus Strategy.</p> <p>North End Road can be delivered with minimal land-take at 1 Olympic Way and, from discussions at present with landowners, the council do not foresee any complications from the land-take.</p>
Brent Cyclists	WEM13	<p>We would much prefer the link from North End Road to Bridge Road to be for cycling only. This would be far cheaper to implement than a connection for motor vehicles, and, with work and highway adoption or land-take in the Atlas Way/Fourth Way/Fifth Way area, could provide a viable, high-quality corridor for walking and cycling via the Brent River path all the way from Stonebridge Park to Bridge Road. We suspect a contradiction between "favouring non-car users" and "improving general highway performance", as the latter most likely will be interpreted in terms of improving motor vehicle throughput, thus worsening the environment for non-car users. We note how picture 6.1 of Great Central way shows a low-quality cycle path painted on a pavement, with lack of priority at a side road junction ? exactly the</p>	<p>Disagree. If North End Road was cycle only it would not facilitate our strategy to remove traffic from the main development area. The North End Road connection will improve cycle access by removing the current ramps.</p>

		sort of thing we do not want to see coming out of this redevelopment.	
Wembley Stadium (FA Group)	WEM13	<p>We strongly support your proposals for Policy WEM 13 for the road and junction improvements to the Stadium Access Corridor and Western Access Corridor. This states that the Council will develop improved highway access for car travel from the North Circular Road by improving the Stadium Access Corridor and the Western Access Corridor with South Way being widened and two-way working restored to both South Way and Fifth Way. You propose that the remaining parts of the gyratory system will be returned to two way working as development comes forward on adjacent sites and that a new road connection will be provided from North End Road to Bridge Road to provide an alternative route through Wembley Park.</p> <p>These proposals are very welcome and will be strongly supported by the Stadium. Overall though we will want to ensure that the maximum egress capacity is provided for the period after Stadium events as part of the SAC and WAC proposals being developed to ensure that the experience of our customers who are allocated car and coach parking spaces is improved. This means that we will want you to revise your cycle lane proposals along the SAC which reduce the overall width from three lanes to only two lanes and that the cycle lane facilities should be provided as a shared-use on the footways. With the low level of pedestrian and cycle flows through the industrial estate the shared</p>	<p>Support welcomed.</p> <p>During Stadium egress the ability for three lanes of traffic along South Way will remain.</p>

		use can clearly be accommodated and is a more efficient use of the highway.	
Henry Lancashire	WEM13	<p>I have recently had the chance to read the "Wembley Area Action Plan Issues and Options consultation" document, and would like to raise some concerns regarding the proposal to open a new access road from North End Road to Bridge Road.</p> <p>1) North End Road is currently a quiet residential road, providing no through access for motor vehicles. It is however, a thoroughfare for the residents of Empire Court, Danes Court and Victoria Hall. During "rush hour" the pedestrianised square (<a href="#">picture and map</a>) can become congested. This was particularly apparent during term-times before the recent relocation of the College of North West London.</p> <p>2) The approach to Bridge Road conflicts with a popular bus stop which is regularly accessed on foot from Wembley Park Underground Station, North End Road and Olympic Way (<a href="#">picture and map</a>). A new major road would significantly increase the difficult and danger associated with pedestrian access public transport.</p> <p>3) The current access from North End Road to Olympic Way enables cyclists to take a quiet, safer route from the Brent River Park towards Olympic Way and Brook avenue. This route is only likely to increase in popularity if the proposed bridge across</p>	<p>The re-opening of North End Road would provide a number of benefits that meet the wider objectives of our transport strategy for Wembley. We would make the following comments on your points:</p> <ol style="list-style-type: none"> <li>1) Pedestrian movements will be considered in the design with footways designed accordingly. New crossing facilities will be provided across the new North End Road and also across Bridge Road which will improve conditions for pedestrians.</li> <li>2) Facilities will be in place to ensure the public can access public transport as described above. The bus stop will be moved slightly to the south. The bus stop can be accessed via the Olympic Way underpass to avoid the need to cross any roads. The North End Road improvement will also provide the opportunity for improved bus interchange at this location.</li> <li>3) The proposed bridge to St David's Close will likely reduce cycle movements along North End Road by offering an alternative North-South connection. Advanced Stop Lines will be incorporated into the junction to provide facilities for cyclists.</li> <li>4) Negotiations are ongoing in terms of land acquisition but we are aiming to minimise the cost. The scheme has been revised to remove the</li> </ol>

		<p>the Chiltern Line is built between St. David's Close and Fourth Way/Atlas Rd.. Converting North End Road to a through route would significantly increase the danger associated with this route.</p> <p>4) The required land acquisition will be a) costly and b) damaging. In particular the green space associated with the river opposite Victoria Hall will be lost. This is a valuable wildlife corridor used by species including wrens, robins, blackbirds and Pipistrelle bats</p> <p>5) The route is physically unsuitable due to lines-of-sight along North End Road / Albion Way. This already leads to vehicles cutting the corner entering Albion Way from N. End Road at low speeds. An increased speed limit (likely associated with the conversion of this to a through route, and at least in part due to the slope from Bridge Road) is incompatible with the current layout and will require loss of pavement/green space (see 4).</p> <p>An alternative proposal, keeping the current pedestrian / cyclist only access while improving the almost 100m of ramps and steps alongside Olympic Way (<a href="#">picture and map</a>) would be preferable. A continuous ramp (without turns) parallel to Olympic Way with steps running perpendicular onto Olympic Way would significantly improve access. In addition the requirement to ascend onto Bridge Road from North End Road before descending onto Olympic Way should be removed.</p>	<p>need for land from Victoria Hall.</p> <p>5) This junction will be redesigned to standard junctions configurations, council has option to improve this junction if it wishes.</p>
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		With this simple, less costly, alternative the pedestrian and cyclist access can remain unimpaired while the Wembley Park Station end of North End Road can be opened further for use as a public space (similar to Olympic Way NW of Bridge Road).	
QARA	WEM13	ADD "Seek funding and improvement to all main road junctions that are near to capacity".	Disagree, 6.15 describes the required improvements which will need to be funded. It does not need to be added to WEM13.
Quintain	WEM14	Paragraph 6.10 describes a strategy for the western corridor. We ask to be consulted on this strategy as it is prepared, since the corridor provides the western boundary to a substantial proportion of our landholdings. In particular, we need to understand how policy WEM14 can be implemented without impacting adversely on vehicle capacity within the corridor. Therefore we ask that the second sentence of WEM14 is amended to read as follows: <i>"Junction and highway improvements along this route are required to facilitate development and will be designed to improve general highway performance, including for non-car users but not so as to reduce capacity for vehicles."</i>	These points are accepted in part. Policy WEM14 is proposed to be amended to read "...junction and highway improvements along this route are required to facilitate development and will be designed to <del>favour these non-car users as well as</del> improve general highway performance, <u>including for non-car users</u> ."
Quintain	WEM14	WEM14 sets out how highway improvements through the whole of the Regeneration Area to the west are sought to be developed to favour cyclists and pedestrians. We have set out a proposed alteration to WEM14 above as we need to understand how these can be brought forward without further constraining vehicle capacity along this corridor. Further, we need to see evidence	Accepted that there is a need for clarification. Add to end of WEM14: <u>Land for improvements will be determined and secured when planning consent is granted for re-development of the site. This will ensure that on re-development, improvements for public transport users, pedestrians and cyclist will be secured.</u>

		that implementation of a widened footway and a bus lane along Wembley High Road as set out in W1 will not constrain capacity in this location and on the wider highway network. We query why the required land take referred to in W1 to deliver these facilities is not shown on a Map in Appendix C and it should be clarified where relevant land has already been secured through extant planning permissions. This information should be provided to facilitate consultation.	
Wembley Stadium (FA Group)	WEM14	<p>The specific issue with the restricted access to the West for our customers who are using an allocated car space as part of their overall package with the Stadium gives rise to further concerns that we have about your proposals for the Western Highway Corridor. We support the proposals for sustainable transport but we also have to preserve a level of service for our customers who elect to travel by car and who have made an important investment in the Stadium business that underpins the confidence in predicted growth across the Wembley AAP area. We therefore have to underline our concern that all future highway and junction proposals should be reviewed and agreed with the needs of Stadium vehicle access and egress in mind to avoid the reduced capacity that has been caused by the Wembley Hill Road and Empire Way changes. This includes the proposed changes to Wembley Triangle, the junctions along Wembley Hill Road, Empire Way and Bridge Road and the junction with Forty Lane.</p> <p>We therefore have to state our reservations about</p>	<p>Disagree to changes to WEM14. We should not be referring to single issue points like this within the policies.</p> <p>The Council recognises that vehicle egress from the stadium is an important consideration in designing new road and junction improvements.</p> <p>Accepted that there is a need for clarification. End of WEM14 to read: "land for improvements will be determined and secured when planning consent is granted for re-development of the site. This will ensure that on re-development, improvements for public transport users, pedestrians and cyclist will be secured"</p>



		policy WEM 14 for the Western Highway Corridor for the reasons we have set out above and would ask that you revise this to include at the very least retaining or ideally increasing vehicle capacity for stadium egress.	
QARA	WEM14	A muddled paragraph – split into two clearly defined objective paragraphs. ADD – motor cycles / scooters.	See earlier point on motorcycles.
Brent Cyclists	6.18	We find it hard to understand the balance that is being talked about in the Car Parking Strategy. Regeneration is not synonymous with encouraging car-use. Why is it necessary to provide a level of car-parking similar to other competing centres? Why not compete on something else, for example, non-car accessibility, and quality of environment? It is not possible to achieve these conflicting objectives at the same time. This appears to be a policy for greater car-dependence of Wembley, and we predict the intended modal shift away from car-use will not materialise unless there is a thorough rethink here.	Point accepted. As with the council's response to comments on paragraph 6.11, it is recognised that in bringing forward development in Wembley, the levels of car parking provided cannot be at the same levels as other strategic centres in North West London or beyond, and that emphasis needs to be placed on access by modes other than the car. At the same time, however, it has to be accepted that there is a need for development to be economically viable and this will require recognition that there should be some access by car. Car parking standards are therefore maximum standards and have been pitched at a level to provide an appropriate balance. It is proposed that the paragraph be amended as follows: 6.18.....In order to promote such development it is necessary to provide a level of car parking <u>similar to other competing centres</u> to enable Wembley to compete with other centres and development that can attract those people that wish to travel by car whilst encouraging people to use other modes of travel, particularly public transport.....
Carole Spolander	6.18	Parking has to be reasonably priced - one suggestion would be to obtain a coin at the cinema for free parking as done in Harrow.	Point noted and the developers of the new cinema and leisure complex will be advised about this option for charging for parking.

TfL	6.19 WEM15 WEM16	<p>The Mayor's transport strategy promotes a smoothing of traffic flow across London.</p> <p>The London Plan would like to see a low number in car parking available for new developments particularly where accessibility to public transport is high.</p> <p>Wembley's AAP seems to suggest the area will be beneficial to cars particularly for town centre uses. TfL would like to see more encouragement for the use of Public Transport.</p> <p>Paragraph 6.19 in 'parking strategy' states that parking will be mainly focused on the edges of the town centre which and should be in compliance with the London Plan standards for retail.</p> <p>Whilst the proposal talks about providing an appropriate balance of car parking provision for town centre uses in order to encourage development, this should also take account of measures to promote public transport or travel planning initiatives in order to reduce car parking to a minimum. Whilst a car parking strategy is referred to no details are provided.</p> <p>Given the high PTAL score, TfL supports the consistency with London Plan policy 6.13 'Parking' and encourages the implementation of car free developments, where possible, whilst still providing for blue badge holders.</p>	<p>Paragraph 6.18 is proposed to be amended as follows so that it places less emphasis on meeting the needs of those who wish to travel by car.</p> <p>6.18.....In order to promote such development it is necessary to provide a level of car parking <del>similar to other competing to enable Wembley to compete with other centres and development that can attract those people that wish to travel by car</del> whilst encouraging people to use other modes of travel, particularly public transport.....</p> <p>Paragraph 6.19 deals with the location of additional parking provided, in accordance with parking standards, to meet the needs of new development so it is not considered that this needs amendment.</p> <p>A cross reference will be provided to the Car Park Strategy document.</p> <p>EVCPs will be provided in accordance with London Plan policy which it is unnecessary to repeat here.</p>
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		Electric Vehicle Charging Points (EVCPs) should also be provided on developments in order to be consistent with the London Plan minimum standards.	
QARA	6.19 WEM16	On what basis have these parking standard figures been produced; at the moment they appear to have “suspect” credentials.	The revised standards are based upon a number of factors including having regard to the London Plan standards, a study of car parking undertaken on behalf of the borough by Steer Davies Gleave and upon the council’s own experience of demand for car parking in Wembley.
QARA	6.20	ADD – “the improvement of road junctions will be factored in so as to allow further development”.	This would be an inappropriate addition to this paragraph.
Quintain	WEM15 WEM16	We support the strategy which <i>‘balances the need to minimise car use whilst ensuring that the area is also attractive to those who wish to come by car’</i> , as set out in paragraph 6.8. We also support the ambition in paragraph 6.18 which acknowledges the need to provide sufficient car parking to allow Wembley to compete successfully with other nearby centres. However, the levels of retail parking standards set out in relation to WEM16 are too onerous and not consistent with the adopted London Plan. We ask that these are amended so that Wembley can compete successfully with other centres. We also ask that WEM15 is clarified to be explicit about the proposed locations of car parking set out in the Framework Parking Strategy and to ensure that there is no conflict in the wording between WEM15 and W1.	It is not accepted that the car parking standards for retail are inconsistent with the London Plan. The London Plan standards are maximum standards and it is recognised in the Plan that “Boroughs should take into account local issues and estimates of local demand in setting appropriate standards...” (para. 6.44 of the London Plan). The standards for Wembley have been drawn up after taking account of the need to achieve a balance between access for the car user whilst achieving the objective of reducing the modal share of trips by car across Wembley. It is notable that the standard proposed sits between the more onerous standards that apply in inner London and the more generous standards that apply in outer boroughs.
Wembley Stadium (FA Group)	WEM15	We discussed our views on parking for Wembley Stadium when we met. As you are aware the new	It is acknowledged that the Stadium is an exemplar in achieving a modal share of trips that are made by public

		<p>Stadium has access to 2,900 car parking spaces for a major event which is a significant reduction from the 7,200 car parking spaces for the old Stadium up to 2002 and clearly leads the way as part of your overall transport objectives for delivering sustainable development in this growth area.</p> <p>We highlighted our main parking issue that has remained an on-going problem for our business for decades and that is the main cause of the additional delay and congestion that we experience as a result of the estimated 2,000 cars that are parked in pirate car parks along our egress routes through the Wembley industrial estate. This on-going problem is a serious detriment to our business and we need support and action from Brent Council working in partnership (but leading on the issue) with other enforcement agencies. We ask that you draft and include a specific AAP policy to address this on-going negative impact on the Stadium business.</p>	<p>transport as opposed to trips to the stadium by car, and this objective is being undermined by pirate contract parking.</p> <p>It is also acknowledged that pirate / contract parking for events at the stadium is undermining the objectives of limiting parking. The council will continue to work with the stadium to identify illegal contract parking and will use its powers to take action where appropriate.</p> <p>Add para after 6.20: <u>Car parking dedicated for events at the stadium is officially limited to 2,900 spaces. This is down from 7,200 spaces for the old stadium because the aim is to encourage a more sustainable mode of travel to events and reduce congestion on local roads. Unfortunately, pirate contract parking is undermining the objectives of limiting parking. Priorities for vehicular access to the stadium need to balance the use of the area by all vehicles and pedestrians. The Wembley transport strategy identifies priorities for different road users along the approaches into Wembley. Working with key stakeholders, the Council will seek to minimise the negative effect of the use of contract pirate car parking.</u></p>
Dr Anoop Shah	6.23	There should also be minimum cycle parking standards - particularly for high rise flats e.g. a minimum of 1 cycle parking space per bedroom.	Reference will be made in paragraph 6.34 to the need to apply London Plan cycle parking standards. These are minimum standards.
Brent Cyclists	6.23	While we believe in low car parking standards for retail and leisure, as stated at 6.1, we are concerned that adopting low residential parking standards leads to streets and pavements cluttered with the overspill cars that people buy, as this has been our experience with this Brent policy so far.	Appropriate car parking standards are based upon evidence of demand amongst other things. Experience of development in Wembley has shown that not all parking provided has been used and that a lower standard may be appropriate. Additionally, the 2011 Census shows that there are only 5 more cars in Brent than there were in

			2001, despite the level of new development over the period. This also suggests that lower standards may be appropriate.
QARA	WEM16	"good public transport "needs defining.	'Good' public transport is defined by TfL as being PTAL levels 4 and above. This will be clarified in the Glossary to the AAP.
TfL	6.25	<p>TfL would suggest that the statement in this paragraph be redrafted as the bus network provides good connections including the following routes which serve the area.</p> <ul style="list-style-type: none"> <li>- Ealing to Wembley, route 83</li> <li>- Ealing to Brent Cross, route 112</li> <li>- Wembley to Brent Cross, route 182</li> <li>- Wembley to Park Royal, route 224 (roundabout routeing)</li> <li>- Acton to Park Royal, route 440</li> <li>-</li> </ul> <p>Any changes to the bus network should be agreed with TfL and should not be restricted to the proposals set out in the AAP.</p> <p>-</p> <p>TfL would also like reference to a Wembley Bus strategy which is anticipated to be developed by Brent Council as part of the cumulative impact study.</p>	<p>Paragraph reworded to highlight orbital access is comparatively poor compared to radial public transport and refer to congestion being a particular issue. The level of detail suggested by TfL in terms of referring to individual routes it too high.</p> <p>Agreed and clearer reference made.</p> <p>Agreed and direct reference to Wembley Bus Strategy included. 6.25:</p> <p><u>While rail and underground provides good radial connections, orbital access and in particular connections to the major centres of Ealing and Brent Cross, and the major employment areas of Wembley Park and Park Royal is poor are provided by bus. Many of the orbital routes suffer from high levels of congestion making bus a less attractive option for these journeys.</u></p> <p>As development intensifies, and in order to encourage investment in appropriate development in line with</p>

			<p><del>regeneration initiatives</del> and further regeneration, improvements to orbital connectivity and linkage with key centres will be pursued. Brent, together with neighbouring local authorities and partnerships, has been supportive of new and/or improved connections and is promoting such initiatives <del>with Transport for London as part of its involvement in</del> through the councils input into the West Sub Regional Transport Plan. <del>However, it must be recognised that such initiatives require the council to justify to Transport for London that any improvement proposals are compatible and consistent with the West Sub Regional Transport Plan. Proposals may subsequently require funding support for Transport for London, and requests for additional services will need to be prioritised against other requests. In addition, the council is currently working with Transport for London on developing future Bus Strategy for Wembley which will identify a viable future bus network which supports future development phasing together with identifying the bus infrastructure required to support that network. It is recognised that any changes to the bus network will have to be agreed with TfL and that changes will not be restricted to the proposals set out in this AAP.</del></p> <p><del>In response to the above requirements, to orbital connectivity challenges identified within the West London Sub Regional Plan, a Strategic Corridor study...</del> [into para 6.26]</p>
Quintain	6.26	In paragraph 6.26 there is reference to a Strategy Corridor Study in relation to public transport improvements along the Wembley Hill Road / Forty Lane corridor. We ask to see this study and for the	Westrans Strategic Corridor Study supplied to Quintain.

		opportunity to review and comment upon it.	
Quintain	6.28	There is reference to a need for improvements to Wembley Stadium Station ticket hall at paragraph 6.28 and we ask that it is made clear that these improvements have been secured through the Outline Permission in relation to the South Way / Wembley Stadium Station (W6) and will come forward as development progresses. The following sentence should be added to this paragraph: <i>"These improvements have been secured through the extant outline planning permission on land surrounding Wembley Stadium Station."</i>	Agreed, add the below text to the end of 6.28.  <u>The Wembley Stadium station improvements have been secured through the extant outline planning permission on land surrounding Wembley Stadium Station.</u>
Quintain	6.31	In paragraph 6.31 there is reference to the ongoing development of a strategy for bus and infrastructure enhancements. Again, we cannot support the policies emerging from that strategy without having had the opportunity to review and comment on the strategy itself. We will be pleased to have the opportunity to review the strategy.	We hope to discuss emerging options from the Bus Strategy with yourselves.
Quintain	Priorities for bus service improvements  W8	In relation to buses, we acknowledge and broadly support the ambition to use the Boulevard to improve pedestrian and cycle links as set out in paragraph 6.19. This could go some way to realising the ambition set out in paragraph 6.33 where the provision of car-free spaces will promote walking. This in turn is related to the statement in paragraph 6.30 querying how buses can successfully integrate with pedestrians on the Boulevard and we wish to investigate this further with you. The priority for bus service improvement on page 50 seems fixed on the principle of buses using the Boulevard and this is reiterated in Site	A Bus Strategy is currently being developed for the Council, and this will look at the potential for operating buses within the wider masterplan area, including the Boulevard / Olympic Way, and supporting infrastructure to facilitate bus routing along the Boulevard. This study will be completed by spring 2013 and the results will be available to support the submission version of the strategy.  The suggested changes are accepted, subject to the findings of the Bus Strategy, expected in spring 2013, which will make recommendations on service routing (either amendments to existing or new routes) and supporting infrastructure.

		<p>Proposal W8. We acknowledge that bus accessibility is key but the detail of how that is achieved is not a material consideration for the AAP. The policies and text as drafted are therefore too prescriptive and indeed your own text identifies this issue at paragraph 6.30. This should be amended in both instances to target improved bus access to the Comprehensive Development Area.</p> <p>To that end, we ask that the fourth bullet point under Priorities for Bus Service Improvement is redrafted as follows:</p> <p><i>"Seek improved bus access to the Comprehensive Development Area surrounding the Stadium."</i></p> <p>This will bring the priority in line with paragraph 6.30. We would also ask that the third sentence of W8 reads:</p> <p><i>"The Boulevard connection could be used by buses, taxis and cycles."</i></p> <p>And that the penultimate sentence of W8 reads:</p> <p><i>"Royal Route could provide an at-grade crossing with the Boulevard to provide for public transport access."</i></p> <p>Other priorities in bus service improvement seek the implementation of more bus priority schemes and we will need to see evidence that the impacts on wider network capacities have been considered in bringing these forward.</p>	
Brent Cyclists	6.33	<p>While we support the general thrust here, it is important not to conflate walking and cycling. They are very different modes of transport requiring different infrastructure. Bikes and pedestrians travel at very different speeds, have different</p>	<p>Agree.</p> <p>Proposed changes to Walking and Cycling chapter seek to address priorities for pedestrians and cyclists separately.</p>



		<p>momentum, and manoeuvre and balance and interact with motor traffic differently. The characteristics of cycling need to be understood if conflicts with other modes are not to be generated.</p>	<p>Proposed changes to 6.33:</p> <p><u>Pedestrians</u></p> <p>6.33 If a modal shift away from the car is to be achieved, then enhancement of the pedestrian environment, together with public transport improvements, will encourage people to choose alternatives to the car. <del>Also,</del> <u>The provision of interconnected, safe, well designed routes and attractive spaces where people can gather free from the intrusion of vehicles will help secure a pedestrian-friendly environment promote walking.</u> A number of new public spaces have <u>already</u> been provided, such as an expanded Central Square in Wembley and the new Stadium and Arena Squares close to the stadium. <del>Further</del> <u>Additional</u> public spaces are required when further development takes place, as set out in the Core Strategy. <del>Clearly,</del> <u>Exclusively</u> <u>Pedestrian streets will also provide a safe and attractive environment, especially for shoppers.</u> <u>The needs of all pedestrians, including disabled and older people, should be incorporated into the design of public space.</u> <u>While there is a general presumption that cycling may be acceptable in pedestrianized areas, an assessment of the overall risk will be necessary.</u> <del>It is important also to recognise the benefits of cycling; both walking and cycling which can bring health benefits as well as delivering modal shift to help reduce carbon emissions.</del></p>
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			<p>Add new sentence after 6.33:</p> <p><u>Shared space can also be used to improve the public realm and environment for pedestrians. Shared space is a design approach that seeks to change the way streets operate by reducing the dominance of motor vehicles, primarily through lower speeds and encouraging drivers to behave more appropriately towards pedestrians. Shared space is only appropriate in low-trafficked areas, such as the new residential district (Site W18). It will not be supported in through-routes.</u></p> <p>Move 6.35 to Pedestrians section and proposed changes:</p> <p>The needs of spectators coming to the Stadium are also important. There are still some locations where there is potential conflict between crowds and traffic, such as along Wembley High Road and the crossing of Wembley Hill Road by the White Horse Bridge. <del>It is also an</del> <u>The</u> option to remove the pedestrian ramp over Engineers Way to the Stadium from Olympic Way and replace it with steps <u>could be considered as part of future development.</u> This would mean, however, that an alternative east – west through-route for vehicular traffic would be needed, especially for event days. The council <del>considers that supports</del> the removal of the <del>pedway</del></p>
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			<p><u>pedestrian ramp</u> and its replacement with an improved access arrangement between Olympic Way and the Stadium <del>would greatly enhance the southern part of Olympic Way and address remove what is currently a poor street environment. It would be supportive of the removal of the pedestrian ramps whilst ensuring</del> <u>providing that access to the Stadium and emergency egress are integral to the design, remains adequate and that any changes help address what is currently a poor street environment.</u></p>
TfL	6.34 WEM17	The AAP should actively promote cycling opportunities e.g. secure cycle parking and cycle routes in order to be consistent with the London Plan.	<p>Agree.</p> <p>Proposed changes to 6.34:</p> <p><u>Cyclists</u>  <del>The provision of shared surfaces, where all the users of streets share the public realm, is a recognised way of improving the environment and safety of pedestrians and cyclists as it leads to much more considerate use by drivers of motor vehicles. Clearly, exclusively pedestrian streets will also provide a safe and attractive environment, especially for shoppers, and</del> <u>Brent is one of the Mayor's 'biking boroughs' with the intention of increasing cycling levels in outer London. There is an existing network of dedicated signed cycle routes (shown on Map X) and stretches of secondary local routes which will provide a degree of encourage people to access into the area Wembley by bicycle. However, cycle links into Wembley are poor or non-existent with a</u></p>

			<p><u>number of physical barriers such as railways, the North Circular and the River Brent. Connections between Wembley and Willesden are particularly limited.</u></p> <p><u>Map X shows existing cycle infrastructure, proposed improvements within the AAP area, and identifies possible new links across major barriers. The Wembley to Ealing cycle corridor is identified as a priority for infrastructure investment in Brent's Local Implementation Plan 2011-14 (LIP2). Improvements and new cycling infrastructure will be planned through the Local Implementation Plan, Strategic Infrastructure Plan, and Transport Strategy. Funding will be secured through developer contributions, the Biking Boroughs Programme, TfL and other future funding streams. The London Cycle Network aims to provide convenient, safe and accessible radial and orbital linkages throughout London. Wherever possible, these should be segregated and protected from major road traffic. Limited facilities and routes exist in the Wembley area, therefore further enhancements would be desirable</u></p> <p>Add new paras in Cycling section:</p> <p><u>New cycling infrastructure should be safe and attractive to cycle users with varying levels of confidence and experience. Bikes and pedestrians travel at very different speeds and have conflicting</u></p>
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			<p><u>priorities, and there should be clear differentiation of cycle and pedestrian space. Therefore, shared use routes, where cyclists and pedestrians share the same off-carriage way route without segregation, will not normally be appropriate.</u></p> <p><u>Wembley's industrial estate attracts heavy good vehicles (HGVs) which are a particular threat to cyclists' safety, accounting for half of all cyclist deaths in London. Given that a primary function of the industrial estate is circulation and parking of HGV traffic, further work is needed to assess the suitability of cycle routes through the industrial area. Cycle routes are unlikely to be appropriate unless there is a segregated, protected cycle-only facility with cyclists given priority in space and time at junctions.</u></p> <p><u>All routes which affect cyclists should be designed in line with prevailing best practice guidance. In particular, cycle lanes and junction improvements should address the vulnerability of cyclists through segregation and protection from major road traffic.</u></p> <p><u>The council will work in partnership with key stakeholders, such as TfL, cycling groups and developers, to deliver and promote cycling initiatives. This includes creating effective local links to key destinations such as open spaces, town centres and strategic cycling corridors. Developers</u></p>
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			<p><u>will be required to integrate the needs of cyclists into the design of their schemes and provide cycle parking in line with London Plan policies. The council will liaise with TfL to increase the provision of secure public cycle parking at Wembley Park, Wembley Stadium and Wembley Central stations. Wembley regeneration area was identified as a potential Cycle Hub within the TfL Brent Biking Borough programme. Cycle Hubs are locations that have potential to increase cycling levels, and can be a focus for cycling investment and initiatives. The council will continue to promote Wembley as an area suitable for a Cycle Hub. Where appropriate, cycle hire initiatives will be supported. and options for a public cycle hire scheme, such as the Central London scheme, could also be considered.</u></p>
Dr Anoop Shah	6.34	<p>Shared space is only appropriate in public places which are destinations in their own right and not a through route for motor traffic. Otherwise pedestrians are intimidated by motor traffic, and this can be particularly difficult for blind and elderly people. The London Cycle Network was never completed, and there are fragments of cycle path which are not joined up. The council needs to devise a comprehensive scheme of high quality cycle paths in consultation with Brent Cyclists. The number of motor vehicle lanes should be reduced and car parking moved away from main roads if necessary in order to provide continuous, safe,</p>	<p>Disagree, shared spaces are appropriate on through links but in Wembley we will be promoting them on quieter streets only.</p>

		segregated cycle paths. A public cycle hire scheme is a low priority for Brent; first it is important to have safe and convenient routes on which to cycle.	
Brent Cyclists	6.34	<p>Indeed "Wherever possible, these [the cycle routes] should be segregated and protected from major road traffic". Unfortunately, the "wherever possible" clause could prove to be a universal get-out for the provision of the sort of quality infrastructure that is required. Choices need to be made about the use of space on main roads, and in the past those choices have almost invariably been made against providing useable, safe, unobstructed space for cycling. Therefore proper criteria need to be applied to determine where separation of cycle traffic from motor traffic is necessary, on the basis of flow and speed of motor traffic. Transport for London provide such criteria in their Cycle Design Standards (though they have been rarely applied) (2005, Chapter 4). Again, we refer to London Cycling Campaign's "Go Dutch" principles (<a href="http://lcc.org.uk/pages/key-principles">http://lcc.org.uk/pages/key-principles</a>) for guidance on high-quality provision for cycling, and to the pages of the Cycling Embassy of Great Britain (<a href="http://www.cycling-embassy.org.uk">http://www.cycling-embassy.org.uk</a>). Shared space for cyclists and pedestrians is only appropriate in very limited circumstances. Particularly in a densely-populated and trafficked urban environment, there is much potential for conflict, and, in general, the default should be NOT to mix up pedestrian and cycle traffic. In general, there should be clear differentiation and delineation of cycle and pedestrian space, particularly on routes which are intended as high-</p>	Agree. See suggested changes to 6.34 above.

		<p>throughput, efficient, strategic corridors for cycling. Shared-surface pavements in general are not acceptable to us, and, in the context of the major redevelopment of this area, it should be possible to avoid them. Occasionally shared space for cyclists and pedestrians and motor traffic is appropriate, particularly in places that are final destinations, not places of throughput, and where motor traffic has been reduced to essential, occasional access. However, the statement "The provision of shared surfaces, where all the users of streets share the public realm, is a recognised way of improving the environment and safety of pedestrians and cyclists as it leads to much more considerate use by drivers of motor vehicles" we regard as completely untrue and without factual foundation. Experiments with shared space of this type in London at Exhibition Road and Sloane Square in Westminster, Seven Dials and Byng Place in Camden, and elsewhere, have shown shared surfaces DO NOT lead to more considerate use by drivers of motor vehicles. In fact, such shared spaces can function to intimidate and exclude the vulnerable from the streets, particularly the elderly and disabled, and most of all the blind. We recommend absolutely against copying such examples in Brent. It is to be noted that, though shared space was originally a Dutch concept, it has not been widely applied by the Dutch in recent times, and the basis of Dutch road design remains the separation of pedestrians, cyclists and motor vehicles from one another. We believe this to be a sound and proven principle to be followed in</p>	
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		<p>general. Shared surfaces with motor vehicles are only sensible where there are no through-routes for motor vehicles and only very limited and controlled access traffic is present. The picture of the cycle path on Great Central Way (picture 6.5) is an object lesson in what NOT to do. This sort of path creates pedestrian-cycle conflict and confusion, and fails to provide an efficient, high-priority route for cycling. There needs to be a clear level or surface difference for the pedestrian and cycle space, and cycle priority at junctions with minor roads. At major intersections, in general, proper signalisation for the cycle flow is needed to avoid conflicts with motor traffic. Better examples of cycle tracks in London can be found in Royal College Street and Torrington Place (Camden) and on Cycle Superhighway 3 on the A13 in Barking and at Cable Street in Tower Hamlets.</p>	
Clive Gomes	6.34	<p>There has been widespread support for the London Cycling Campaign's 'Love London, Go Dutch campaign' <a href="http://lcc.org.uk/pages/key-principles">http://lcc.org.uk/pages/key-principles</a> and The Times 'Cities fit for Cycling' campaign <a href="http://www.thetimes.co.uk/tto/public/cyclesafety/">http://www.thetimes.co.uk/tto/public/cyclesafety/</a> from all the main political parties and the Mayor of London.</p> <p>This redevelopment gives Brent Council an opportunity to create decent segregated cycle lanes that will enable the residents to cycle safely to work and to the shops.</p> <p>With the success in the Olympics more people than ever are buying cycles. The death toll of cyclists</p>	Agree. See suggested changes to 6.34 above.

		<p>killed on the road is increasing and will no doubt increase further unless something is done about it. Please use the opportunity and be the first London Council to do something that will make Brent proud and keep cyclists safe.</p>	
Brent Cyclists	6.35	<p>The connection between Olympic Way and Bridge Road and North End Road is also poor, with an excessively long zig-zag ramp the only access to Olympic Way on the south side of Bridge Road. Access from the north side of Bridge Road is easier, but this will often involve crossing a heavy flow of traffic on Bridge Road to access. This whole arrangement needs radical rethinking for both pedestrians and cyclists, the latter being not catered for at all at the moment, obstructed by barriers from making any kind of easy connection between these roads.</p>	See response to WEM13
Brent Cyclists	6.36	<p>We fully support the creation of a new pedestrian and cycle link between St David's Close and the development area. As we have already noted, this is a critical missing link in the current infrastructure. It is needed to connect "Neasden Village" with Wembley Park, and it should really be regarded as a top priority for funding, and should be built to a decent capacity to cater for two-way separated pedestrian and cycle flows. It should not be obstructed with any kinds of barriers for cycling, and should have cycleable ramps that do not require dismounting. The other high-priority link that is required is a new bridge over the Chiltern Line at Sherrans Farm Open Space to provide cycle and pedestrian access to the development area</p>	<p>See changes above re: cycle routes.</p> <p>Proposed changes to 6.36:</p> <p>Although <u>some</u> improvements to pedestrian and cycle facilities have taken place, there are still barriers to movement across the main rail lines which bound the eastern part of the area. A study into additional bridge crossings recommended a bridge over the railway lines (Underground and Chiltern) near St David's Close <u>to overcome existing deficiencies</u> as it was both feasible and offered substantial connectivity benefits by linking green</p>

		<p>from the south. The same design criteria should apply to this link. It should not be forgotten that access to the area by cycle will remain very poor unless also new, good-quality crossings of the North Circular Road are provided, and additionally an upgraded crossing of the West Coast Main Line at Lyon Park Avenue. In respect of policy WEM13: We repeat here our caution about shared surfaces. They are only appropriate in limited circumstances, and should not be regarded as a good substitute for the quality, prioritised cycle infrastructure that is necessary to substantially raise cycling modal share. Pedestrianised areas may sometimes appropriately be cycle routes as well, or at less busy times, but clear distinctions in the use of surfaces in a busy place should normally be made. We don't know what is meant by a "cycle hub".</p>	<p><u>spaces, for example from Fryent Country Park through at Chalkhill to development sites and provides a strategic link between</u> existing and future footpaths along the River Brent and Wealdstone Brook. This proposed bridge is shown on the <del>Proposals</del> Map <u>6.1 and 6.2</u>, and a plan showing the land take required to support this improvement is shown in Appendix C.</p> <p>Add new para after 6.36: <u>To ensure Wembley is a legible destination for visitors, the area will be made more accessible to pedestrians and cyclists through improvements to signage, for example through the 'Legible London' initiative. This will be particularly focused on creating links between the three stations, local attractions, open spaces, cycle routes and canal.</u></p>
Quintain	WEM17	<p>Within WEM17 there is reference under point 2 to the reduction in the proportion of through traffic using the town centre. We ask for confirmation as to how this can be achieved without significantly constraining capacity and increasing pressure on other parts of the highway network. In the meantime we would ask that point 2 is redrafted as follows: <i>"Promote space for pedestrians, cyclists and public transport users in the traditional town centre and reduce the proportion of through traffic using routes through Wembley town centre in ways that maintain capacity for vehicles on the wider</i></p>	<p>Change to WEM17 bullet:</p> <p><u>Prioritising space for pedestrians, cyclists and public transport users in Wembley the traditional town centre and reducing the proportion of through traffic using routes through Wembley the town centre in ways that maintain capacity for vehicles on the wider network</u></p>

		<i>network."</i>	
Cllr Janice Long Lead Member for Housing Harlesden Ward LB Brent	WEM17	<p>I am writing to express my objection to a particular part of policy WEM 17, Walking and cycling. The first point "Shared surfaces where appropriate in the new urban quarter close to the Stadium."</p> <p>Shared surfaces are never appropriate as they make the areas no go areas for many disabled people. Blind people need a kerb to manoeuvre in an area as it is an easily discernible contrast between a road and pavement. Shared surfaces are opposed by Guide Dogs for the Blind and also The National Federation of the Blind.</p> <p>Shared surfaces are also opposed by people with learning disabilities and the organisations that represent them, eg Mencap. People with a learning disability are taught that staying on the pavement, which they identify by a kerb, means they're safe. If there is no kerb they do not know who has priority and feel unsafe and insecure. In the 21st century we promote independent living for people with disabilities. Introducing shared surfaces takes away that independence.</p>	<p>See also above comments re: shared surfaces. The council has approved guidance, The Brent Placemaking Guide, May 2011, that considers shared surfaces to be appropriate in certain circumstances. There can be considerable advantages, for example as currently agreed for the NW Lands development where at certain times of day surfaces are proposed to be shared with vehicles servicing shops. This allows for the development of new shops without the need for separate servicing areas</p> <p>The area around the stadium will need to cater for a broad cross section of users, and these users will all have different needs. Shared surfaces have been identified as a potential tool in the toolkit for the new urban quarter. The detail of how they would be designed is not yet defined in detail. Shared space areas need not be any less safe than conventional spaces – with good design, shared spaces can be as safe.</p> <p>Conventional spaces can have safety issues associated with kerbs if these are not well designed. In the new urban quarter, we would look to provide "alternative guidance" if the kerb line is insufficient or absent. These could be building lines or drainage features which will assist with navigation.</p> <p>Proposed changes to WEM17:</p> <p><a href="#">WEM 17</a> Walking and Cycling</p>

			<p><del>Measures</del> The council will <del>seek to implement to</del> encourage walking and cycling by: <del>are:</del></p> <p>1. Allowing shared surfaces in low trafficked areas in the new urban quarter close to the Stadium.</p> <p>2. <del>Promote</del> <u>Prioritising</u> space for pedestrians, cyclists and public transport users in <u>Wembley the traditional town centre</u> and reducing the proportion of through traffic using routes through <u>Wembley the town centre in ways that maintain capacity for vehicles on the wider network</u></p> <p>5. <del>Ensuring</del> <u>e</u> that any junction/ highway improvements and new streets <u>are designed to prioritise take due account of pedestrian/ cycle access, convenience and ease of movement</u> and the need to ensure a high quality public realm.</p> <p>3. <del>Provide exclusively pedestrian streets in locations with the heaviest footfall, and restrict servicing to early morning only.</del></p> <p><u>Ensuring that streets and spaces are designed so that conflict between road users is reduced and vulnerable users are protected</u></p> <p><u>Requiring appropriate cycling facilities, such as parking, showers and storage, as part of all major new developments and refurbishments</u></p>
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			<p><u>Identifying new cycle routes and signage opportunities for commuting, leisure and local cycling trips</u></p> <p><u>Maximising cycling investment in Wembley from all sources</u></p> <p><u>4. Providing a new pedestrian and cycle bridge over the Metropolitan/Jubilee/Chiltern rail lines near St David's Close to address existing deficiencies</u></p> <p><u>6. Enhance existing Increasing the provision of secure cycle parking and introducing a Cycle Hub within the area.</u></p> <p><u>7. Continue to progress feasibility work on the Western Footbridge</u></p>
Wembley Stadium (FA Group)	WEM18	<p>Major event related activity</p> <p>We note your overview for the Wembley Stadium operations as a world-renowned centre regularly attracting crowds of up to 90,000 spectators along with other attractions such as Wembley Arena with a capacity of 12,500.</p> <p>We also understand that most spectators travel to events by public transport with all spectators completing the last leg of the journey on foot, and that there is a temporary traffic management plan</p>	<p>We recognise that the attendance at Wembley Stadium and Wembley Arena events provides an important input to the local economy and that the movement of these users needs to be as easy as possible</p> <p>Brent Council will continue to look at options for reducing the scale of pirate parking and accept the disruption that this causes (see new para overleaf). The Wembley Transport Strategy seeks to increase capacity via the</p>

		<p>that is activated on event days along with the partial completion of the stadium axis corridor along the SAC that provides a tidal flow traffic system which is operated to assist vehicular traffic to and from the North Circular Road.</p> <p>There are two main issues that we wish to comment on with regard to draft AAP for Major Event Related Activity and these are: i) policy WEM 18 for stadium coach parking; and, ii) traffic access corridors for the Stadium.</p> <p><i>Coach Parking and traffic access corridors</i></p> <p>The draft AAP policy WEM 18 states for Event Related Transport that “in considering the location of new coach parking for Wembley Stadium, any new facility should:</p> <ul style="list-style-type: none"> <li>• Be within 960m crow fly distance from the centre of the stadium;</li> <li>• Vehicular access and egress from the coach park should not conflict with event day pedestrian access;</li> <li>• Be easily accessible from the NCR;</li> <li>• Be located away from the town centre and be sufficiently large to allow coaches to manoeuvre; and</li> <li>• Be flexible to allow use by cars if required</li> </ul> <p>Other measures the Council will seek to implement to improve event day transport are:</p>	<p>Great Central Way / South Way route which will assist highway users accessing stadium events.</p> <p>The transport strategy for Wembley includes a balanced approach to cater for all road users, which will include better provision for public transport users/pedestrians/cyclists along certain routes (notably Wembley Hill Road/Empire Way). The council will work with the stadium to ensure that on event days, the exiting vehicles clear the area as efficiently as possible.</p> <p>Para to be added after 6.20 (see WEM 15): <u>Car parking dedicated for events at the stadium is officially limited to 2,900 spaces. This is down from 7,200 spaces for the old stadium because the aim is to encourage a more sustainable mode of travel to events and reduce congestion on local roads. Unfortunately, pirate contract parking is undermining the objectives of limiting parking. Priorities for vehicular access to the stadium need to balance the use of the area by all vehicles and pedestrians. The Wembley transport strategy identifies priorities for different road users along the approaches into Wembley. Working with key stakeholders, the Council will seek to minimise the negative effect of the use of contract pirate car parking.</u></p>
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		<ul style="list-style-type: none"> <li>• Introduce more effective signage for pedestrian and vehicular travel;</li> <li>• Provide an enhance pedestrian environment and introduce high quality public realm improvements without detriment to residents and visitors alike; and,</li> <li>• Provide new crossing facilities, primarily for spectators walking to the stadium, across Wembley Hill Road.</li> </ul> <p>We wish to make a combined submission on these Event Related Transport issues that cover the location of our coach parking and the Traffic Access Corridors. With regards to traffic access and egress for our main events the quality of service for our customers, many of whom are our higher paying long-term customers, has been deteriorating since Stadium opening in 2007. This is as a result of:</p> <ol style="list-style-type: none"> <li>a reduction in traffic capacity along our alternative egress routes, namely; Wembley Triangle to Harrow Road onto the NCR (which was previously removed from the Stadium transport plan) , and, Bridge Road and Forty Lane onto the NCR; and,</li> <li>the ongoing and increasing levels of pirate car parking along the single route that you have identified as the stadium axis along the SAC in the draft AAP.</li> </ol> <p>We would therefore ask that the draft AAP</p>	<p>We recognise the difficulties in exiting the stadium area by the Stadium's higher paying long term customers.</p> <p>i)The Council would seek to find the optimum balance between car traffic and pedestrians crossing at the Triangle, such that traffic exiting via Harrow Road to the NCR is not unnecessarily hindered. The Council is keen to work with the stadium to identify innovative solutions to the management of pedestrians crossing to reach Wembley Central. This work would include confirming that the demand for this pedestrian route is still as strong as it was before the profile and usage of Wembley Stadium station and Wembley Stadium stations increased to the current level</p> <p>ii) The Council will continue to explore ways of reducing the impact of pirate parking, and work with Wembley Stadium to ensure that this does not unnecessarily</p>
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		<p>incorporates the following additions:</p> <ul style="list-style-type: none"> <li>• The enforcement measures taken forward by Brent Council to reduce pirate car parking that we have previously referred to;</li> <li>• A change in the priority for Stadium access for cars and coaches that returns to the previous “three corridor strategy” used for the old Stadium and that provided improved reliability and faster egress times;</li> <li>• A priority for the egress of Stadium cars and coaches that completes the overall egress much faster than currently experienced so that the local area can return to normal activities;</li> <li>• An event day traffic management overlay that enables Stadium traffic to egress through Wembley Triangle and along the Harrow Road onto the NCR;</li> <li>• A revised priority for the Western Highway Corridor that retains existing traffic capacity for Stadium egress and re-instates the previous traffic capacity at the roundabout junction of Wembley Hill Road with Empire Way;</li> <li>• Coach parking locations that retain the ability for the Stadium to park up to 2,900 cars with an equal level of convenience as that currently enjoyed and that can provide up to 458 coach parking spaces in</li> </ul>	<p>prolong the period during which traffic exits the stadium.</p> <p>We would make the following commitments to Wembley Stadium regarding our joint working, but do not envisage that these need to be included in the plan directly. Those where we envisage a change are underlined (add before policy on p.53)</p> <ul style="list-style-type: none"> <li>• <u>Efforts will be made by the Council to reduce the impact of pirate car parking</u></li> <li>• <u>The Council will work with the Stadium to review and develop the current event day traffic management arrangement to optimise traffic flow along the Harrow Road route</u></li> <li>• The Council has a “three corridor strategy” for routes away from Wembley, but these do place different priorities for different road users, and this balance needs to be retained and so are not in a position to give vehicle access top priority along all three routes</li> <li>• Part of the Wembley transport strategy is to provide improved access along South Way (through restoration of the gyratory to two way working). This will assist with completing the overall egress quicker</li> <li>• The Council is reviewing the traffic capacity between Empire Way and Wembley Stadium, including review of traffic signal phasing and other improvements which do not involve-re-</li> </ul>
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		an “open parked” layout to enable independent departure and in line with the current parking agreements between Wembley Stadium and QED. The proposed distance of 960m from the centre of the Stadium that the AAP identifies potentially sits outside this existing agreement and should not be presented in the final version of the AAP.	<p>instating the previous junction layout</p> <ul style="list-style-type: none"> <li>We envisage that the 960m crow-fly distance covers most of the locations within the industrial land that would be appropriate for coach parking, and therefore consider that the 960m is suitable for defining a distance threshold for the coach parking for stadium events.</li> </ul>
TfL	6.40	TfL would like to see the list of potential investors expanded so that funding is solely not dependent upon TfL otherwise TfL would request removal from this list.	Priorities for Investment (para 6.40) should go in new chapter, ensure other funding sources are referred to e.g. <u>LIP</u> , TfL, <u>s106</u> , CIL, London Growth Fund
Quintain	6.40	There is reference to identified priorities and a programme for implementation of improvements in paragraph 6.40, which are critical to the success of the regeneration of Wembley. These should be made explicit for review and comment. They should be set out so that it is clear which are required to address existing deficiencies and which are solely attributable to future anticipated development currently without planning permission.	<p>Work has already been undertaken in earlier studies on the prioritisation of the different schemes in Wembley. The Cumulative Impact Assessment currently underway will help to refine and further develop these scheme priorities.</p> <p>Regarding funding priorities, the section 106 contributions and CIL funding will continue to be a major source of funding. However, opportunities will continue to be pursued regarding public sector funding sources, especially where private sector match funding is available.</p> <p>Clarification has been added to paragraph 6.15 <u>Some of these junction improvements have already been delivered using funding secured through extant planning permissions, as shown on Map 6.1.</u></p>
Brent Cyclists	6.40	The proposals in the outline map (6.1) are	Points accepted. Drury Way bridge will be removed from

		generally encouraging. We don't however, know what the intended purpose is of the new bridge for cyclists and pedestrians proposed across the Chiltern Line at Drury Way and Great Central Way, and it is not clear to us how this would work or what it could achieve for cycling. Drury Way and Great Central Way currently constitute an extremely unattractive route for cycling, and we believe it would be better to develop an independent route for cycle access to the area from the south, separate from North Circular Road traffic, which we suggest would better be accomplished by a bridge across the Chiltern Line at Sherrans Farm Open Space (see Sustrans Wembley Stadium GOAL study report for Brent, 2007). This would complement the more easterly access via an improved Brent River Path. It would take very significant improvements to Brentfield Road, Drury Way and Great Central Way to make this corridor into a viable cycle route.	the outline map. The proposed pedestrian/cyclist bridge at Drury Way was conceived as part of the Stadium Access Corridor improvement scheme, and was included within the adopted UDP 2004. However, it is clear in light of the Highways and Bridge study 2012 that this bridge provides minimal accessibility benefits, with a particular lack of wider accessibility links. Therefore, it is concluded that this improvement should not be included within the Wembley Area Action Plan
TfL	Omission	All travel Plans that are submitted should be written with regards to TfL's guide for best practice.	TfL provide guidelines for when Travel Plans are required for new development. The council will continue to follow these guidelines and ensure Travel Plans are submitted where required. As this is entrenched with general planning/development policy we will not refer directly to this within the WAAP.

#### Chapter 7: Housing

Representor	Policy	Comment	Response
Natural England	Chapter 7	Natural England has no substantive comments to make in respect of housing numbers, tenures or mix;	Noted

		<p>however the following may be of use in the Council's determination.</p> <p>Natural England believes that local authorities should consider the provision of natural areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of green-spaces providing for a range of recreational needs, of at least 2 hectares of accessible natural green-space per 1,000 population. This can be broken down by the following system:</p> <ul style="list-style-type: none"> <li>• No person should live more than 300 metres from their nearest area of natural green-space;</li> <li>• There should be at least one accessible 20 hectare site within 2 kilometres;</li> <li>• There should be one accessible 100 hectares site within 5 kilometres;</li> <li>• There should be one accessible 500 hectares site within 10 kilometres.</li> </ul> <p>This is recommended as a starting point for consideration by local authorities and can be used to assist with the identification of local targets and standards. Whilst this may be more difficult for some urban areas/authorities than other, Natural England would encourage local authorities to identify the most appropriate policy and response applicable to their Borough</p>	
Trevor Ellis	Housing	<p>Summary:</p> <p>Long-term stress and frustration suffered due to noisy neighbours and poor quality housing. Councils should be made by law to make sure that the housing they build is adequate enough for people to live in. Until this happens the standard of housing in</p>	<p>We're sorry to hear about your bad experiences with noisy neighbours. We encourage you to continue to contact your housing association about this matter.</p> <p>In planning terms, there are a number of avenues open to us to ensure a high quality of housing, including sound proofing. These are:</p>

		<p>Brent will remain low. We deserve to live in good high quality housing. I have absolutely no faith whatsoever in this new plan for regeneration.</p>	<p>Building regulations: noise nuisance is regarded as a health and safety issue and Part E of the Building Regulations relates to noise control for residential uses. The aim of the regulation is to protect residents from the noise of activities in other rooms or adjoining properties. New homes must meet acoustic standards set out in the Regulations and a sample of dwellings on every new development is tested to ensure this.</p> <p>Code for Sustainable Home: policy CP19 in Brent's Core Strategy (2011) requires new homes in growth areas such as Wembley to achieve a minimum Code level 4, and outside growths areas to achieve level 3. Code for Sustainable Homes includes sound insulation under the 'well-being' category. The Code rewards developers for achieving greater standards of sound insulation than Building Regulations currently require.</p> <p>In terms of size, the Mayor's London Plan (2011) contains internal area space standards for new homes (policy 3.5) which are applied by the council when determining applications. The council has supplementary planning guidance (SPG17) includes size requirements for amenity space (ie gardens and balconies).</p> <p>These regulations and policies are applied to all applications for new housing in the borough.</p>
GLA	WEM 19 7.15-7.16	<p>Government considers that Affordable Rented housing "is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing". The</p>	<p>It is felt that a policy on affordable rent, which is a borough-wide issue, is more appropriately dealt with in the council's forthcoming development management policies document, rather than the Wembley Area</p>

		<p>London Plan and its associated draft Housing SPG recognise this as a matter of fact (though not policy: the NPPF post-dated the Plan). The materiality of this product is in the process of being enhanced by being recognised as a formal policy concern through a Revised Early Minor Alteration (REMA) to the London Plan. Boroughs are therefore strongly advised to incorporate Affordable Rent within their targets for Social Rent to achieve the objectives of the London Plan and the NPPF. In Brent's case this would mean making clear that to ensure general conformity with the London Plan and maximise affordable housing output, Affordable Rent should be considered as part of the 70% of output identified in the Core Strategy as being for Social Rent.</p>	<p>Action Plan. This approach is also fitting given the timing of the London Plan examination and Inspector's report on the matter which would delay the submission of the WAAP.</p> <p>Therefore changes are proposed as follows:</p> <p>7.12 New Affordable Rent that meets the needs of households eligible for social housing, <u>with eligibility determined with regard to local incomes and local house prices, at a cost low enough for them to afford</u> will be accepted as part of the tenure mix in order to maintain a new supply of affordable housing in Wembley. <u>A policy on Affordable Rent will form part of the borough's Development Management policy document. Introduction of different affordable housing tenures into the Wembley housing mix, for example market sale products, will be considered where demonstrable housing need can be met and viability grounds evidenced.</u></p> <p><b>Affordable Rent</b></p> <p>7.15 <del>The reduction in capital funding for affordable housing under the Comprehensive Spending Review 2011-15 will significantly curtail the delivery of traditional new build social rented housing at target rents in the short to medium term. In June 2011 a new category of affordable housing was added for planning purposes.</del></p> <p>7.16 <del>Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market</del></p>
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			<p>rent, including service charges. Affordable Rent now forms part of the tenure mix in Wembley in order to maintain a new supply of affordable housing in Wembley in the short to medium term, and support regeneration and growth in the borough. In line with the NPPF and the London Plan, the council will require Affordable Rent housing to meet the needs of households eligible for social housing at a cost low enough for them to afford, determined with regard to local incomes and local house prices. Affordable Rents, inclusive of service charge, will need to be set well below 80% of the local market rents in certain cases in order to meet this affordability requirement, for example, on development of larger family accommodation which will be occupied by households with a greater number of dependents. The council will provide guidance on new Affordable Rent in its Tenancy Strategy.</p> <p><a href="#">WEM 19</a> Affordable Rent Affordable Rent subject to rent controls that require a rent of no more than 80% of the local market rent, including service charges, are an appropriate part of the tenure mix in Wembley. Affordable Rent will be required to meet the needs of households eligible for social housing at a cost low enough for them to afford, determined with regard to local incomes and local house prices.</p>
GLA	WEM 19, 20 and supporting	On a number of occasions the document uses words from the PPS 3 definition of affordable housing in reference to the affordable rent product; WEM 19	<p>Proposed changes (see also above):</p> <p><a href="#">WEM 20</a></p>

	text 7.12 and 7.16	for example states that “affordable rent will be required to meet the needs of households eligible for social housing at a cost low enough for them to afford, determined with regard to local income and local house prices”. The PPS 3 definition of affordable housing has been replaced by that in the NPPF and the draft Housing SPG devolving from the 2011 Plan strongly advises boroughs to use the latter to ensure conformity with national policy. The Revised Early Minor Alteration to London Plan updates its policy 3.10 so it is in line with the definition in the NPPF. To ensure general conformity with the London Plan and consistency with national planning policy WEM 19, 20 and supporting text 7.12 and 7.16 need to be updated to reflect the NPPF.	<p>Housing Mix</p> <p>The housing mix guidance provided in table 7.12 will be applied in the relevant parts of Wembley. Additionally, new Affordable Rent that meets the needs of households eligible for social housing, <u>with eligibility determined with regard to local incomes and local house prices, at a cost low enough for them to afford</u>, will be accepted as part of the tenure mix. The council will encourage intermediate affordable housing tenures, such as discounted market sale products, where the council can secure future equity payments that can be recycled into new affordable housing.</p>
GLA	WEM 19, 20 and supporting text 7.12 and 7.16	The London Plan seeks to maximise the delivery of affordable housing, and we welcome recognition that “seeking to retain social rent housing at target rent levels as the principle element of the affordable housing within the Wembley housing tenure mix ....leads to a reduced supply of new affordable housing”. However, attempting to restrict the rent levels to a lower rent than 80% market rent (para 2.16), is likely to have the effect of reducing the supply of affordable housing. For the Affordable Housing programme to deliver a range of housing it requires the flexibility to offer a range of rents, particularly if larger family homes are to be delivered at lower rent levels. The current drafting of WEM 19, 20 and supporting text 7.12 and 7.16, which do not reflect the NPPF’s definition of affordable housing could have the effect of	<p>It is felt that a policy on affordable rent, which is a borough-wide issue, is more appropriately dealt with in the forthcoming development management policies document, rather than the Wembley Area Action Plan. This approach is also fitting given the timing of the London Plan examination and Inspector’s report on the matter which would delay the submission of the WAAP.</p> <p>We are therefore removing the policy on Affordable Rent from the WAAP and proposing the changes set out above.</p>



		restricting rent levels and thus constraining delivery and thus is not in general conformity with policy 3.11 of the London Plan or consistent with the intent of the NPPF.	
GLA	Para 7.16	In addition, Para 7.16 states that the Council will provide further guidance on new Affordable Rent in its tenancy strategy. The text of the draft tenancy strategy states "while the council cannot and does not seek to control rent levels, this strategy aims to give clear direction". The Tenancy Strategy is not part of formal planning policy and while it can be referenced, the policy can not suggest that it should be taken into account in determining applications. The nationally set definition of affordable rent product makes clear that it must be available at rents up to 80% of market rent (National Planning Policy Framework (NPPF)). The Borough's attention is drawn to government's view that "reintroducing rent controls 'via the back door' of planning policy is likely to hinder the supply of affordable and private rented accommodation, reducing choice for tenants and simply meaning less housing is available to rent" (Appendix 3: Shapps 2012).	Noted. The council is preparing a policy on Affordable Rent as part of its Development Management Policies document.
Carole Spolander	WEM21	As regard to increased family housing - new adequate schools to be built as existing schools are oversubscribed.	It is an integral part of the strategy for development in the borough that the social infrastructure needs of new housing, including schools, will be met by the time it is needed (policy CP15 of the Core Strategy). A site for a new primary school is identified in the Plan and there continues to be capacity in the Ark Academy at secondary level.
GLA	WEM 23	It is suggested that WEM 23 should be re-titled as	WEM23 has been re-titled to "Wheelchair Housing and

		wheelchair housing is not considered to be supported housing.	Supported Housing”.
GLA	WEM 24	The document acknowledges the importance of the private rented sector and the role of good quality private build private rented sector units, while this is welcomed and policy WEM 24 reflects many of the recommendations of the Montague report, the policy could constrain the delivery of affordable housing. The council should consider how affordable rent could be used in such schemes to maximise affordable housing delivery while meeting a range of needs.	Noted
Quintain	WEM24 7.33	We welcome the Council’s draft policy on Private Rented Sector (WEM24). We question why the Kelaty House permission has not been included in the analysis of Permissions for Student Accommodation at paragraph 7.33. We would ask that the anticipated increase in population in the Wembley Growth Area is made clear in order to properly comment on the 20% ceiling on student accommodation beds.	Support welcomed. Table will be amended to include the figure for Kelaty House. An estimate of the projected growth in population will be included. This will be based upon the projected growth in the number of housing units in Wembley in the Core strategy, amended to bring it up to date, and an average occupancy of 2.47 persons per unit, as set out in the Infrastructure & Investment Framework.

Chapter 8: Town Centres, Shopping, leisure and Tourism

Representor	Policy	Comment	Response
Carole Spolander	Ch.8	Querying the site of the cinema with view to using public transport - buses have to be accessible to the site, parking has to be reasonably priced	Access to cinema site was considered as part of the decision to grant planning permission. The site has a PTAL rating of 4, which is good. Page 50 of the AAP sets out priorities for bus service improvements which include routing of buses into the heart of the new urban quarter. Management and pricing regime of car parks is not within the remit of the AAP.
GLA	WEM26 8.3	<p>The 30,000 sq.m. of additional floorspace over and above granted planning consent as proposed in paragraph 8.3 is viewed as being ambitious in context of the current economic climate and the strategic pipeline of retail development floorspace proposed (for example at Brent Cross and White City).</p> <p>However Wembley is identified in the London Plan (TableA2.1) as having 'high' potential for growth and it has capacity to accommodate it. Wembley is identified as a Major town centre, with very good public transport accessibility. Adding the proposed amount of space would be consistent with its Major centre status and based on the GLA 2009 Town Centre Health Check baseline this in addition to the Quintain consents, would not tip it into Metropolitan centre scale.</p> <p>The GLA are supportive of Brent's aspirations in principle to accommodate growth in the town centre (as otherwise the growth may end up in</p>	<p>It should be clarified that the 30,000 sq.m of additional floorspace is a level of new floorspace which the Retail Need and Capacity Study (2008) identified as being appropriate for Wembley. This figure was then included in the Core Strategy, adopted in July 2010. Subsequently, planning consent has been granted to QED for approximately this amount of new retail floorspace at Wembley. Para 8.16 clarifies this, stating "since the Core Strategy was adopted in 2010, consent has been granted for a further 30,000 sq m of new floor space on the NW Lands to provide a new shopping street..."</p> <p>It is accepted that any proposed floorspace in addition to this would be subject to an up to date retail study being undertaken.</p> <p>Correction to para 8.3: "A further 30,000 sq m net of new retail floorspace is proposed over and above that granted planning consent up to July <del>2010</del> 2011." (ie Core Strategy adoption date)</p>

		<p>unsustainable locations as it has done in the past e.g at/around IKEA site).</p> <p>However, this ambitious expansion of Wembley should be backed up by a detailed up-to-date retail study to support and justify the additional 30,000 sq.m. of retail floorspace proposed</p>	
Paul Aldridge (RPS)	WEM26	<p>RPS objects to Policy WEM26 which is considered to be too prescriptive and not consistent with national planning policy guidance.</p> <p><i>Policy WEM26 states that 'New retail, leisure and office development will be directed to the town centre as defined on the Proposals Map. Edge of Centre retail and leisure development will be considered appropriate only when existing town centre sites have been developed or where the proposed use, because of its size, is incapable of being accommodated on an existing town centre site'</i></p> <p>It is fully acknowledge that new retail development should be focused within town centres wherever possible, and that there is a requirement to adopt a sequential approach to such development. However, there are circumstances where specific retail development is appropriate in out of centre locations provided it meets the national policy requirements. Policy WEM26 as currently worded is too prescriptive and is inconsistent with the policy tests set out in the National Planning Policy Framework.</p>	<p>Disagree that policy is inconsistent with NPPF. Policy WEM26 is in line with para 23 of the NPPF which requires local authorities to allocate appropriate sites and set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres. WEM26 also employs the sequential test for town centre uses in para 24 of the NPPF which states main town centre uses should be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered.</p> <p>Agree to acknowledge role of existing retail uses in the SIL.</p> <p>New para after 8.8: <u>Strategic Industrial Area</u> <u>The SIL contains established out-of-centre retail uses which provide employment and economic benefits to the local area. Proposals to improve these existing retail facilities will be supported providing they remain local in nature.</u></p> <p>Changes to WEM26 to clarify different policy areas for town centre and Strategic Cultural Area:</p>

		<p>Section 4 on page 24 concerns Wembley Industrial Estate. Whilst it is acknowledged that the Area Action Plan does not seek to allocate designations or proposals for all the sites within this character area, RPS consider that it should be recognised within the text that the existing retail uses within this character area provide substantial employment benefits. The retail uses are established at this location, and in addition to the valuable employment benefits provided by these operators the wider economic benefits should also be acknowledged.</p> <p>Indeed, policy WEM26 should also recognise that the existing out of centre retail uses within the Wembley Industrial Estates character area provide substantial employment and economic benefits, and that proposals to improve these existing retail facilities should be supported to ensure these uses continue to be able to offer the valuable employment and economic benefits to the local area.</p>	<p><del>New retail, leisure and office development</del> New retail, leisure and office development will be directed to the town centre as defined on the Proposals Map. Edge of centre retail and leisure development will be considered appropriate only when existing town centre sites have been developed or where the proposed use, because of its size, is incapable of being accommodated on an existing town centre site.</p> <p><u>Outside of the town centre, ancillary retail function as part of a major leisure, tourism or cultural use may be acceptable in the Strategic Cultural Area.</u></p> <p>Large foodstores (over 2,000 sq m gross) will be directed to sites within or adjoining Wembley High Road.</p> <p><u>Improvements to existing local retail uses in the SIL are supported.</u></p> <p><del>Shops (Use class A1) will not generally be appropriate on the eastern side of Olympic Way.</del></p>
Quintain	Map 8.1	We welcome the annotation showing the extension of the Town Centre Boundary to include the NW Lands as shown on Map 8.1.	Support welcomed.
Quintain	WEM26 8.10	In relation to WEM26 we object to the proposal for additional large foodstores exceeding 2,000 sqm gross to be directed to sites within the High Road given that the town centre now extends through the Comprehensive Development Area where the majority of the Borough's new growth will arise. It should also be clarified that there are existing	<p>Para 8.9 refers to the Brent Retail Needs and Capacity Study (2008) which identifies the requirement for convenience floorspace set out in para 8.10.</p> <p>The Plan retains a preference for a new large foodstore to be located on the High Road even though it is proposed to extend the town centre designation</p>

		permissions for convenience retail within the Comprehensive Development Area, which are anticipated to come forward. Justification for the statement within paragraph 8.10 is also sought before full comment can be made.	throughout the area. The council wishes to continue to ensure that regeneration continues to benefit the whole of the area and that regeneration of part should not lead to decline of another part. The existing permissions which allow for a large unit to be occupied potentially by a supermarket operator was granted as an exception to normal policy for particular reasons, and specific conditions were applied to the consent. These particular reasons may not apply to future proposals. The Plan states that there are outstanding consents for a further 30,000 sq m of new floorspace on the NW Lands.
Quintain	WEM27 Map 8.1	<p>We are concerned about the identification of the Stage 1 Lands eastern element as a location for a major leisure, tourist and cultural use as shown on Map 8.1. The 'eastern lands' on the Stage 1 Development Area have outline permission for mixed use regeneration, including aparthotel, office, residential and close care. Given the ambitions for W28 to provide a transition between the mixed uses around the Stadium and the industrial estate to the east, including residential, we ask that WEM27 is amended to clearly identify that a major leisure attractor could come forward as part of a mixed use development, including residential. This would be in line with the ambition set out in paragraph 4.31, which anticipates that land east of Olympic Way will have a more residential character focussed around a newly created park. We ask that the second sentence to WEM27 is amended as follows:</p> <p><i>"...to the east of Olympic Way, including as part of mixed use development, as shown on the Proposals Map."</i></p>	<p>Agree.</p> <p>Identify Strategic Cultural Area on new strategic map at beginning of AAP.</p> <p>Changes to 8.17: Wembley has long been a focal point for leisure, tourism and cultural uses <u>and is identified in the London Plan as a Strategic Cultural Area where this type of development is encouraged. These include sports and leisure provision, tourist and visitor attractors, hotels and conference facilities.</u> Often these uses are of a scale, and consequently have a level of impact, which <u>is may not be</u> conducive to a traditional town centre location. However, land to the east of the area, including the current stadium car park, for example, is capable of accommodating such uses <u>and as such is designated as Wembley Strategic Cultural Area.</u> Development in this area can also help create a buffer against the impact from waste operations and other 'bad neighbour' uses to the east.</p>

			<p>Changes to WEM27:  <del>Leisure, Tourism and Cultural uses</del> <u>Strategic Cultural Area</u>  <u>Major</u> leisure, tourism, and cultural uses are encouraged within the <u>Strategic Cultural Area</u> <del>area</del> shown on Map X. <del>Major leisure, tourism and cultural development is appropriately located on sites to the east of Olympic Way as shown on the Proposals Map.</del> <u>Leisure, tourism, and cultural uses can form part of a mixed use scheme, including office and residential, where appropriate.</u>  Significant improvements to public transport will be required where development will attract a large number of trips.</p> <p>See also changes to W19 to recognise existing consent.</p>
Theatres Trust	WEM 27 and WEM 31	<p>We are pleased that the document is aware that leisure, tourism and cultural uses are vital for the vitality and viability of town centres. We particularly support Policies WEM 27, WEM 30 and WEM 31, but wish to point out that there are differences between community facilities and cultural facilities. We suggest Policies WEM 27 and WEM 31 should not overlap and a better distinction made between them.</p> <p>Museums, art galleries and places of worship are not strictly speaking 'community facilities', but belong within the 'family' of cultural facilities as they are not absolutely necessary for the health and well-being of residents. In our opinion, community facilities tend not to be leisure orientated, but are</p>	<p>Suggested change to 9.14:  ...The council will however support the provision of community and religious groups bringing forward its own community facilities provision <u>in accessible locations</u>.</p> <p>WEM31.5 is contrary to London Plan policy 3.16 and Core Strategy para 5.98 which requires social infrastructure (including community and cultural facilities) to be in accessible locations. Not all of the AAP area is therefore suitable for community facilities.</p> <p>Suggested change to WEM31.5:  5. Support the provision of <del>community facilities</del> <u>social infrastructure</u> including religious, community and cultural provision <u>in locations accessible to all sections</u></p>

		<p>provided for the more fundamental resources of healthcare, educational establishments and community centres. It is important that a distinction is made so that even if you don't agree with our understanding of these terms it is important that your interpretation is understood in the context of your policies so that planning applications are assessed against a solid policy framework.</p>	<p><u>of the community and within easy reach by walking, cycling and public transport within the AAP area; and</u></p> <p>Suggested changes to 8.17: Wembley has long been a focal point for leisure, tourism and cultural uses <u>and is identified in the London Plan as a Strategic Cultural Area where this type of development is encouraged. These include sports and leisure provision, tourist and visitor attractors, hotels and conference facilities.</u> Often these uses are of a scale, and consequently have a level of impact, which is <u>may not be</u> conducive to a traditional town centre location. However, land to the east of the area, including the current stadium car park, for example, is capable of accommodating such uses. Development in this area can also help create a buffer against the impact from waste operations and other 'bad neighbour' uses to the east.</p> <p>Show Strategic Cultural Area on strategic map.</p>
Quintain	WEM28	<p>In relation to WEM28 we object to the restriction that no more than 7% of Use Class A5 should be incorporated within a single parade. Each parade should be considered on its merits, having regard to role and impact.</p>	<p>Policy WEM28 is supported by evidence base document Takeaways in Wembley (August 2012). Additional support for a policy restricting the number of takeaways comes from the GLA's Takeaway Toolkit (November 2012).</p> <p>Takeaways have both a positive and negative influence. They contribute to the local economy and provide jobs; however fast food can have an adverse impact, for example on the health of the population.</p> <p>One of the key recommendations of the Takeaway Toolkit is that local authorities adopt clear planning</p>



			<p>policies that enable them to restrict the opening of new takeaways in areas where there is a high concentration of fast food outlets, or where vulnerable groups such as children and young people are a concern.</p> <p>Policy WEM28, as well as policies in the forthcoming development management policies document, will help do this.</p> <p>The council has taken a measured approach to takeaways in Wembley. 6.2% of the shops in Wembley are takeaways (A5 use class). The chosen option (limit of 7% in a single length of primary/secondary frontages) is considered to provide a balance between allowing an increase in A5 uses whilst limiting the potential adverse impacts, especially on health.</p> <p>Hot food takeaways are directed towards town centres. Policy WEM28 aims to avoid over-concentration of A5 uses within Wembley town centre. The policy provides a degree of differentiation between primary/secondary frontages and the area outside this. It is not considered appropriate or proportionate to drill down further than this.</p> <p>Suggested change to 8.18 to acknowledge role of takeaways in the local economy:</p> <p>Wembley has a large number of takeaways and fast food outlets, partly as a result of demand generated by those attending events at the Stadium and Arena. <u>While takeaways can make a positive contribution to the local economy and community,</u> there is evidence that large</p>
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			concentrations of fast-food takeaways contribute to unhealthy lifestyles...
QARA	WEM28	Delete existing para. and replace with one offering much better diction!	<p>Changes to WEM28:</p> <p>Hot Food Takeaways (A5 Uses)</p> <p>In recognition of the specialist role that the town centres in Wembley have in meeting the needs of visitors to the area, outside of primary and secondary frontages applications for new A5 uses will be considered on their merits.</p> <p>There will be a limit of 7% on the proportion of <u>units in</u> A5 use in any single length of primary or secondary frontage of Wembley / Wembley Park town centres. No further A5 uses will be permitted within 400 metres of a school entrance/exit point.</p>
QARA	8.19	This paragraph reads but as “wish list”; on what current and future factual basis are these mere “wish list” comments being made!	The paragraph recognises that there is potential to host major conferences by making use of existing and potential new facilities in the future. This is also recognised by developers, owners and operators locally.
Quintain	WEM29	<p>We welcome and support the ‘<i>agglomeration</i>’ of conferencing uses in the Regeneration Area comprising facilities within the Stadium, the Arena, the Hilton Hotel and other hotels in the area, together with the Civic Centre and request that this delivery across a number of different properties is made clear in WEM29 through the following alteration to the first sentence:</p> <p><i>“The development of new conferencing facilities is promoted in Wembley, either purpose-built or as part of major mixed-use development within existing or new separate buildings.”</i></p>	<p>Suggested change to WEM29: Conferencing facilities -</p> <p>The development of new conferencing facilities <u>within existing or new buildings</u> is promoted in Wembley, either purpose-built or as part of major mixed-use development.</p>
QARA	WEM30	Include “industrial / technical training, mentoring	Proposed change to WEM30 in recognition that not just

		and practice centres”.	<p>creative uses can make use of vacant sites or buildings:</p> <p>Temporary Creative Uses The use of vacant sites or buildings will be promoted for occupation by temporary creative uses, especially creative industries that will benefit Wembley’s retail, leisure, tourism and creative offer.</p>
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#### Chapter 9: Social Infrastructure

Representor	Policy	Comment	Response
MOPAC/MPS	Chapter 9	<p>The MOPAC/MPS generally support the Social Infrastructure section of Chapter 9 which recognises that additional and enhanced social infrastructure will be needed to support the anticipated growth in the area. However, it is recommended that an additional paragraph is included under the heading ‘emergency services’ in order to ensure that the impact of new development upon the policing in the Wembley area can be appropriately mitigated. The MOPAC/MPS recommend that the following paragraph is included within Chapter 9 after paragraph 9.11:</p> <p>Emergency Services 9.12 The scale of development within the proposed Intensification Area will require enhancements to neighbourhood policing facilities. In order to ensure that the Wembley area remains a safe and secure place for residents and visitors, it is important that the diverse nature of policing needs as a result of development and intensification can be met. The London Borough of Brent will therefore work</p>	<p>Accepted.</p> <p>Insert new paragraph after 9.12 as follows:</p> <p>“The scale of development within the Wembley Growth Area will require enhancements to neighbourhood policing facilities. In order to ensure that the Wembley area remains a safe and secure place for residents and visitors, it is important that the diverse nature of policing needs as a result of development and intensification can be met. The London Borough of Brent will, therefore, work alongside the Mayor’s Office for Policing and Crime and Metropolitan Police Service to ensure the delivery of necessary policing facilities in Wembley so that the impact of new development upon policing can be mitigated.</p>

		alongside the Mayor's Office for Policing and Crime and Metropolitan Police Service to ensure the delivery of necessary policing facilities in Wembley so that the impact of new development upon policing can be mitigated.	
Carole Spolander	Chapter 9	More police on patrol would be required - inadequate at the moment.	It is proposed that an additional paragraph be added in recognition of the need to mitigate the impact of new development on policing. The issue of police on patrol is an operational matter for the police service.
TfL	Chapter 9	AAP needs to take into account future money raised by Community Infrastructure Levy (CIL) and where the funding might go. When referencing the Community Infrastructure Levy (CIL) it would be helpful to also refer to the Mayor's CIL.	Add new paragraph after 9.8 as follows:  S106 funding has made, and continues to make, a significant contribution to the infrastructure requirements of development in Wembley. Funding of infrastructure will shortly be replaced in the main by Community Infrastructure Levy (CIL) contributions from development in the area. A proportion of CIL collected (£35 per sq m) also contributes towards the Mayor's funding of Crossrail.

#### Chapter 10: Response to climate change

Representor	Policy	Comment	Response
Natural England	Chapter 10	The council should consider the role of the natural environment under this section, together with energy efficiencies. As discussed above, incorporating the natural environment into the built environment can significantly contribute to climate change adaptation including through flood storage, reducing rainwater runoff and ameliorating the urban heat island effect. We recommend that the role the natural environment can play in climate	The Open Space, Sports and Wildlife Chapter now includes a cross reference on climate change:  11.1 There is a lack of open space in Wembley and access to existing open spaces is limited. <u>Biodiversity and the natural environment can lead to opportunities, not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality of life.</u> The strategic policies set out in the London Plan

		change adaptation is drawn out further in the Draft Plan, and policies cross referenced where possible to reflect this.	support the protection of local open space...
Brent Campaign Against Climate Change	Chapter 10	<p>1. We welcome the inclusion of a response to Climate Change in the report and note this statement from the Wembley Plan:</p> <p>10.6 Climate change will have a significant impact on the economic, social and environmental well being of Wembley. Hotter summers will have a bigger impact in Wembley because of the predominance of concrete and buildings. Heat waves will mean more people are likely to suffer from illnesses and could also lead to damage to roads, railways and buildings. Heavy thunderstorms and intense winter downpours will become more common, and will lead to flash flooding where the drainage system cannot cope with the increased rainfall. It is therefore crucial that future development in Wembley addresses these impacts and limits its contribution to climate change by minimising carbon emissions.</p> <p>10.7 Specific issues for Wembley include the legacy of industrial use in the area which led to a lack of green and 'cool' spaces. Much of Wembley is deficient in open space and there are few mature trees. Land adjacent to the Wealdstone Brook is most at risk of flooding, although much of Wembley is also prone to surface water flooding. In addition, the majority of the sewer network in the Wembley area is undersized.</p> <p>2. We welcome the recognition of the importance of this issue and that fact that it is being addressed in detail by the Council. We welcome the proposals on naturalising of the Wealdstone Brook, flood plain</p>	Support welcomed.

		storage, tree planting, green roofs and creation of new parks are all welcomed as responses to this situation.	
Brent Campaign Against Climate Change	WEM32 WEM33	<p>Climate Change Mitigation:</p> <p>1. Under this heading the Council make a number of proposals for Decentralised (CHP) Combined Heat and Power facilities and for Energy from Waste over which we have reservations.</p> <p>2. The reservations below regarding CHP are pertinent: and should inform the Council's plans: (From <a href="http://www.arthurshumway.smith.com">www.arthurshumway.smith.com</a>) "Combined Heat and Power" (CHP) or "cogeneration" systems for producing both heat and electric power are generally mature and really can reduce emissions of CO<sub>2</sub> compared to other fossil-fuel technologies. But there are two problems with typical discussion of CHP:</p> <p>(1) Fossil-fuel-based CHP cannot be a long-term solution on climate or energy because they still burn fossil fuels, and therefore still emit a lot of CO<sub>2</sub>. Reducing that by 20% or even 50% is not enough; we need to take steps that over the next 30-40 years will bring fossil CO<sub>2</sub> emissions close to 0.</p> <p>(2) Efficiency claims for CHP systems are frequently greatly overstated. Heat is lower-quality energy than electricity, and only at high temperatures does it become close to comparable. Efficiency claims for CHP systems that use high-temperature heat are not so far off, but CHP systems that make use of low-temperature waste heat have much lower thermodynamic efficiencies than usually claimed. The inflated efficiency claims often lead to assertions that CHP is the "largest" or one of the largest</p>	<p>Disagree (1) &amp; (2)</p> <p>(1) The policy does not imply that the CHP should only be run by fossil fuels. Once the district heating pipes are in place, only the CHP engine needs to be replaced/upgraded when changing heat supply technology such as renewables. Connection to existing buildings could also be possible that would reduce carbon emissions to those buildings requiring boiler replacements.</p> <p>(2) Even if the CHP needs to be run by fossil fuels at the beginning; it would still emit lower CO<sub>2</sub> than individual gas/electric boilers.</p> <p>(3) Concern noted.</p> <p>Add sentence to 10.9 to emphasise the waste hierarchy that "reduce" is the first priority: "The EU Waste Framework Directive...followed by preparing for re-use, recycling, other recovery and disposal, in descending order of environmental preference. <u>Brent will continue to support initiatives to reduce waste generated. CP19 of Brent Core Strategy requires major proposals to submit a Sustainability Statement that include the indication of reusing recycled aggregates and construction materials.</u> Good progress is being made to recycle more in Brent; however, there is still some left over waste, known as 'residual waste', which cannot be recycled..."</p> <p>Policy WEM 33 does not imply that residual waste would be the only fuel source to power the decentralised energy system. There could be two CHP engines co-existing and</p>

		<p>potential solutions. But the number of applications that require high-temperature heat where CHP efficiency really is quite high are limited. And the modest efficiency gains with low-temperature waste heat use, which could be much more widely applied, don't lead to very much improvement in overall energy use. The combining of heat and power production in CHP systems can reduce our fossil CO2 emissions by a few percent, but much more than that is needed in coming decades.</p> <p>3. The Wembley Plan (WEM 33) supports Energy from Waste and again we have reservations.</p> <p>3.i The first issue is that the emphasis should be on the reduction of waste at source in manufacturing, then re-use and recycling. There is a danger that in using residual waste as fuel in order to reduce landfill, the incentive to reduce waste is removed. Furthermore, dependence on waste as fuel to generate heat and power, can lead to the need to import fuel in order to keep the processes going. The NABU Study (2010) in Germany illustrates this: The study shows that in 2010, somewhat less domestic waste will be produced in Germany than at present.. This is due to a decline in the population and a slight increase in recycling. Overcapacities with incinerators are already occurring. This applies to combustible material used in energy from waste plants as well as conventional incineration</p> <p>At this point in time, 2 million more tonnes of waste are imported into Germany than exported. This is equivalent to a goods train 1000 km in length. Germany is therefore a net importer of waste</p> <p>We would not want Brent to become an importer of</p>	<p>powered by different types of fuels. There is no intention to encourage any import of residual waste from elsewhere, the emphasis is on self-sufficiency and "waste generated locally"</p> <p>A Wembley Energy Master Plan has been commissioned that appropriate energy from waste technologies will be examined. The study will form the evidence base for the WAAP.</p>
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		<p>waste in order to fuel our EfW plants.</p> <p>3.ii Secondly, the Plan states 'There are a number of new and emerging technologies that are able to produce energy from waste without direct combustion'. Our reservation on this is that in some technologies the initial stages do not involve combustion but further stages involve, for example, gases being burned off.. We cannot pretend to be expert on these issues but urge that complete transparency, independent expert advice (rather than assurances from the companies involved) and public debate must take place before any such technologies are employed.</p> <p>3.ii In investigating the detrimental impact on human health the Council must take into account the concerns that exist over nanoparticles produced in the incineration process and the emerging science discipline of nanopathology that studies the impact of such particles on the human body.</p>	
Environment Agency	WEM 33 Energy from Waste	<p>We made comments at the issues and options stage which favoured a balanced policy that aimed to reduce the amount of waste through recycling and also supporting the recovery of energy from residual waste thus reducing the amount that goes to landfill. We note your comments in paragraph 10.9 about good progress being made to recycle more and therefore your focus is on dealing with the residual waste. We think the policy could be strengthened by encouraging proposed developments to reuse recycled aggregates and construction materials on site and ensuring space for facilities to recycle domestic waste are provided for housing and commercial developments.</p>	<p>Concern noted.</p> <p>Add sentence to 10.9: "The EU Waste Framework Directive...followed by preparing for re-use, recycling, other recovery and disposal, in descending order of environmental preference. <u>Brent will continue to support initiatives to reduce waste generated. CP19 of Brent Core Strategy requires major proposals to submit a Sustainability Statement that include the indication of reusing recycled aggregates and construction materials.</u> Good progress is being made to recycle more in Brent; however, there is still some left over waste, known as 'residual waste', which cannot be recycled..."</p>



Environment Agency	WEM 34 Urban Greening	<p>We support this policy that requires green roofs, green walls and landscaping as part of development proposals. This accords with London Plan Policy 5.10 and paragraph 99 of the National Planning Policy Framework which recognizes the value of green infrastructure to adapt to climate change impacts. We support the recognition in paragraph 10.10 that this urban greening will have multiple benefits in terms of social, health, providing amenity space, reducing flooding and increasing biodiversity. The policy could be improved by recognizing the importance of connectivity between green spaces. Additional wording could be added as follows: Wherever possible, opportunities to connect new green spaces to existing green spaces should be maximized to help create green infrastructure. Encouraging green infrastructure through redevelopment will help to improve the ecological connectivity between sites for the benefit of local wildlife.</p>	<p>Support welcomed. Suggestion agreed.</p> <p>Add sentence to end of 10.10: <u>Encouraging green infrastructure through redevelopment will help to improve the ecological connectivity between sites for the benefit of local wildlife.</u></p> <p>Suggested change to WEM34: Development proposals must incorporate urban greening measures such as green roofs, green walls, trees and soft landscaping. <u>Wherever possible, opportunities to connect new green spaces to existing green spaces should be maximized to help create green infrastructure.</u> Where site constraints limit the level of urban greening that can be provided on site...”</p>
Natural England	WEM 34 Urban Greening	<p>WEM 34 Urban Green refers to a variety of Green Infrastructure Measures which is welcomed and encouraged and can be linked to other Chapters of the Plan, helping to strengthen the document further.</p>	<p>Support welcomed. There has been progress towards the increase of green spaces in Wembley. Supporting text 11.6 and 11.7 and policy WEM36 highlight the policy context on open space provision.</p>
Environment Agency	WEM 35 Flood Risk	<p>We support some elements of this policy; however, we think this should be improved in terms of the strategic approach to flood risk. We welcome the references to your Strategic Flood Risk Assessment level 1 and the Surface Water Management Plan (SWMP). We also welcome the requirements for applying the sequential approach to the layout of sites and the requirements for Flood Risk</p>	<p>Support welcomed.</p> <p>Brent has carried out an assessment which applies the sequential and, where appropriate, exception test for sites in Flood Zones 2 and 3a and 3b. The assessment also considers policy recommendations from Brent’s Strategic Flood Risk Assessment and Surface Water Management Plan.</p>

		<p>Assessments and SUDs.</p> <p>With regard to sequential test your policy requires that each proposal that falls within Flood Risk Zones 3a and 2 will be required to pass the Sequential Test, and where the site is affected by 3a, the Exceptions Test must be applied. Paragraph 100 of the NPPF states:</p> <p>Local Plans should apply a sequential, risk based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:</p> <ul style="list-style-type: none"> <li>• applying the Sequential Test;</li> <li>• if necessary applying the Exceptions Test;</li> <li>• safeguarding land from development that is required for current and future flood management;</li> <li>• using opportunities offered by new development to reduce the causes and impacts of flooding; and</li> <li>• where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations.</li> </ul> <p>We recommend that strategic decisions about the sequential test and exceptions test for this plan are not left to the development management process. We object to major planning proposals that are submitted without the submission of sequential test evidence, though this requirement is lifted where the decision has already been made at a strategic level. We will only accept sequential test evidence from the Local Authority and in our experience development management teams can struggle to</p>	<p>Suggested changes to WEM35 and supporting text:</p> <p>Flooding</p> <p>10.11 There are two <u>main</u> types of floods in the area, one is associated with the river when the actual amount of river flow is larger than the amount that the channel can hold, and river will overflow its banks and flood the areas alongside the river. Land adjacent to the Wealdstone Brook is the area at risk of flooding. The map shows the areas at risk of flooding. Brent seeks to ensure that all new development in flood risk areas is appropriately flood resilient and resistant and that any residual risk can be safely managed.</p> <p>10.12 As required by the National Planning Framework, <u>the council has undertaken a sequential approach should be used in areas known to be for sites at risk from any form of flooding including fluvial and surface water flooding. Planning recommendations are provided for sites at risk of flooding in the Site Proposals chapters. Inappropriate The council has a proactive approach to risk reduction when considering the suitability of sites for future development in the Wembley Area Action Plan, in line with the recommendations of the SFRA. New development in areas at risk of flooding will be required to apply a site-level sequential test to ensure should be avoided by directing development is steered away from areas at highest risk and located in line with the NPPF flood risk vulnerability classification but where development is necessary, making it safe without increasing flood risk elsewhere.</u></p> <p>10.13 In most of the urban area, roads and land are usually impermeable which can lead to surface water flooding. <del>Much</del></p>
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		<p>provide this evidence needing support from the Planning Policy teams. Tables 1-33 (pages 3-8) of the Technical Guide to the NPPF are useful in outlining the appropriate uses and policy aims for each flood zone and where the Exceptions Test should be applied (as the Exceptions Test in zone 3a is not applicable to all types of development). This information can be used by Local Authorities to plan what uses are appropriate and will be accepted by them if proposed in a flood zone area. You applied the sequential test to your Site Allocations DPD producing a standalone document. This plan also allocates sites within flood zones 2 and 3 (W13, W14, W16, W21, W22, W25, W26 and W27). You need to demonstrate that you have applied the sequential test to these sites and what land uses will be deemed appropriate in these areas which should then inform this policy. You have areas of functional floodplain (flood zone 3b) which are fairly well confined to the river channel and corridor areas of the Brent and Wealdstone Brook as shown on your Map 10.1 on page 78. Your draft policy recommends that a Flood Risk Assessment is submitted for these areas. However, it is worthwhile consulting your SFRA to see what the policy recommendations are for zone 3b. With the area of 3b being narrowly confined to the river channels it should be straightforward to avoid development in this zone altogether and protect its function as a flood storage area. Where redevelopments are proposed on existing footprint, options should be sought to relocate the development outside 3b thus restoring this land to the floodplain.</p>	<p><del>of Wembley is prone to surface water flooding. The Flood and Water Management Act 2010 requires local authorities across England and Wales to develop, maintain, apply and monitor a</del> <u>Brent's Surface Water Management Plan (SWMP) provides a strategy for local flood risk management in the borough. their areas. Brent Surface Water Management Plan (BSWMP), which contains the Preliminary Flood Risk Assessment and a Flood Risk Management Plan. The document identifies and designates a Critical Drainage Area (CDA) for the Wembley Stadium area which has several areas of surface water flooding affecting property and critical infrastructure. Three WAAP sites fall into a Local Flood Risk Zone (LFRZ). aims to help manage and reduce surface water flood risk in Brent.</u></p> <p>10.14 <del>The Act also introduces the requirements for d</del> <u>Developers are required to construct include sustainable urban drainage systems (SUDS) in their schemes. The SWMP identifies specific SUDS measures for the Wembley Stadium CDA to relieve pressures on the drainage system, reduce flood risk and the demand for fresh water. These include rainwater harvesting and grey water recycling, can help relieve pressures on the drainage system, It can reduce flood risk and the demand for fresh water. SUDS such as green roofs, filter strips and swales, storm water storage tanks, permeable and porous pavements, re-profiling of ground levels, basins, ponds, reed beds can help reduce the volume and speed of water flowing into drains and eliminate surface water flooding. BSWMP favours the application of SUDS. Measures to alleviate surface water flooding through SUDS will be required as part of the development of sites W3-W4, W6-W20 and W25-W29. Specific SUDS requirements for sites in the LFRZ are set out in the appropriate Site Proposals.</u></p>
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		<p>We think this policy could be improved by including flood risk requirements that are specific to this area using the recommendations in the SFRA and SWMP, in addition to the no net loss of floodplain storage or increase in maximum flood levels. Local Flood Risk Zones (LFRZ) are identified within the Wembley Area Action Plan boundary. LFRZ's are defined as the actual spatial extent of predicted flooding in a single location. For the specific LFRZs are there specific measures that would help alleviate the surface water flooding that could be included as policy criteria? Although it is welcome that the policy requires that all major proposals will be required to apply SuDs, its worth considering whether this standard should be applied to all sites and what type of SuDs should be maximized on these sites. . London Plan Policy 5.13 requires developments to aim to achieve Greenfield runoff rates through the application of SuDs and refers to the drainage hierarchy. Policy 5.13 also states: LDF preparation B Within LDFs boroughs should, in line with the Flood and Water Management Act 2010, utilise Surface Water Management Plans to identify areas where there are particular surface water management issues and develop actions and policy approaches aimed at reducing these risks. Although a reference to the SWMP is included, it is worthwhile considering if more specific measures or standards should be included for the Wembley area.</p>	<p>10.15 <del>In addition,</del> Most of the sewer network in the Wembley area is undersized. Careful consideration must be given to issues of sewer flooding, both on and off site, as a result of new development. Developers may be required to carry out studies to ascertain whether proposed development will lead to overloading of the existing sewer infrastructure.</p> <p><u>10.16 Specific flood risk reduction measures and Flood Risk Assessment requirements are set out for each site proposal (chapters 12-16). This includes recommendations from the SFRA, SWMP and site-specific sequential considerations. From 2013 all new developments will be required to submit information to Brent's SUDS Approval Board (SAB) which has a duty to ensure that all new developments have incorporated SUDS to deal with the surface water run off from the development.</u></p> <p>WEM35: Flood Risk <u>All proposed development in Flood Zones 2 and 3 will require a detailed Flood Risk Assessment (FRA), in accordance with Section 6.7 of Brent's Strategic Flood Risk Assessment.</u></p> <p><u>Applications will be assessed against the site-specific flood risk mitigation requirements set out for individual Site Proposals.</u></p> <p><u>Development is not suitable in Flood Zone 3b.</u></p> <p><u>Application of a site-level sequential approach will be expected to locate development towards areas of lowest risk within the site. More vulnerable development will not usually be appropriate in Flood Zone 3a. Where it is proposed in exceptional circumstances, an Exception Test will be required.</u></p>
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			<p>Proposals within Flood Risk Zones 3a (High Probability and Climate Change) and 2 (Medium Probability) will be required to pass the Sequential Test, and where a site is affected by Flood Zone 3a, the Exception Test must be applied. Proposals will need to demonstrate how flood risk is reduced by sequential layout of the site and form of development. All proposals for development in Flood Zones 2 and 3a&amp;b will require a full Flood Risk Assessment (FRA). Proposals in Flood Zone 1 which are over 1 hectare in size will also require a site specific FRA.</p> <p>Development proposals in the area above must demonstrate that there will be no net loss in floodplain storage nor an increase in maximum flood levels, within adjoining properties as recommended by Brent's Strategic Flood Risk Assessment Report Level 1 (2007).</p> <p><u>Developments will be required to implement SUDS to ensure that runoff from the site (post redevelopment) does not exceed Greenfield runoff rates. In order to reduce surface water flood risk in the area, all major proposals will be required to apply SUDS in accordance with Brent Surface Water Management Plan.</u></p> <p><u>Developers will also be required to demonstrate whether there is sufficient capacity both on and off site in the foul sewer network to support development. Where insufficient capacity exists developers will be required to identify how any necessary upgrades will be delivered ahead of the occupation of development.</u></p> <p>See also changes to individual Site Proposals.</p>
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Thames Water PLC	WEM 35 Flood Risk	It is recommended that policy WEM 35 Flood Risk is expanded to incorporate flooding from all sources including foul sewers. It is suggested that the following text is added to Policy WEM35: “Developers will be required to demonstrate whether there is sufficient capacity both on and off site in the foul sewer network to support development. Where insufficient capacity exists developers will be required to identify how any necessary upgrades will be delivered ahead of the occupation of development.”	Agreed.  Suggested change to 10.11: There are two <u>main</u> types of floods in the area...  Suggested addition to WEM35: <u>Developers will also be required to demonstrate whether there is sufficient capacity both on and off site in the foul sewer network to support development. Where insufficient capacity exists developers will be required to identify how any necessary upgrades will be delivered ahead of the occupation of development.”</u>

#### Chapter 11: Open Space, Sports & Wildlife

Representor	Policy	Comment	Response
Natural England	Ch.11	<p>WEM 36 – Open Space Provision. WEM 37 – Open Space Improvements WEM 41 – Access to Nature WEM 42 - River Brent and Wealdstone Brook</p> <p>Natural England welcomes the provision of new parks and open spaces, along with potential to “naturalise” the River Brent. Also welcomed and supported are opportunities to enhance ecology and biodiversity of the area, providing links to and between green/open spaces for people as well as wildlife.</p> <p>The use of the existing natural signature of the borough can be used to help deliver this and other</p>	<p>Support welcomed.</p> <p>Add sentence to WEM42 supporting text: <u>11.21 The London Rivers Action Plan includes restoration projects for the Wealdstone Brook and River Brent. Two of these projects are within Wembley and any improvements to the rivers should be in line with this plan and the Brent River Valley chapter of Natural England’s publication London’s Natural Signatures.</u></p> <p>Add Natural England’s ‘London’s Natural Signatures’ report - Brent River Valley chapter – to supporting evidence.</p>

		<p>environmental objectives. Natural signature refers to the underlying landscape of an area, which if drawn out, can make a direct and powerful contribution to 'sense of place' and local distinctiveness.</p> <p>Natural England has recently produced the London Landscape Framework which gives further guidance on the 'natural signatures'. We recommend you consider this document as a means of helping the Council achieve its aspirations. The London Landscape Framework can be found at:</p> <p><a href="http://www.naturalengland.org.uk/regions/london/ourwork/londonnaturalsignatures.aspx">http://www.naturalengland.org.uk/regions/london/ourwork/londonnaturalsignatures.aspx</a></p> <p>Sustainable transport options such as walking and cycling are welcomed and can be used to form green chains/links, increasing access, overcoming fragmentation as well as providing ecological/wildlife corridors.</p> <p>Natural England will comment on individual applications/sites as they are brought forward.</p>	
LBB	11.1	Update	<p>Change to 11.1:</p> <p>... Brent has one of the worst participation rates in England for sport and physical activity (Sport England's Active People Survey <u>2011-12</u> <del>2005-6</del>). ...</p>
Quintain	WEM36	<p>WEM36 sets out a specific requirement in relation to the orientation of the park on Wembley Retail Park. This is a matter of detail for merit based consideration in due course. We ask that WEM36 is</p>	<p>The location and orientation of the park were established in the Fosters plan for the area and incorporated into the councils 2004 Wembley Masterplan. As well as the reintroduction of the formal historic urban form established in</p>

		<p>amended so that the first two sentences state: <i>"The council will require a new public open space of around 1.2 ha with frontage to Engineers Way. The new space will provide for a range of sporting activities and play facilities."</i></p> <p>In relation to this, we support the acknowledgement of a building plot at the junction of Olympic Way and Engineers Way within W17 as it will provide enclosure for Olympic Way, set out as lacking in paragraph 4.6.</p>	<p>the Empire Exhibition as a counterbalance to the strong north-south route of Olympic Way, the orientation of the park was considered to be a fundamental element in establishing an 'east-west' grid (Wembley Masterplan, 2004 p23) . The layout of the new park was comprehensively analysed as part of the production of the 2009 Wembley Masterplan. Following the assessment of a number of options, the east-west orientation was considered to provide the most beneficial outcome in terms of maximising sunlight into the space whilst creating the vital physical connection between the centre of the masterplan area and the localities to the east. Given the fact that permission has been granted for a significant development on the site of Kelaty House based on this layout, as well as the likely future occupation of one of the eastern sites as a primary school, the council believes that the justification for orientating the park east-west remains an important requirement of this document.</p>
Maddox Associates on behalf of Solum Regeneration	WEM36	<p>Solum Regeneration accepts the need for further open space in the Wembley area. The proposals submitted by my client, seeks to provide one of the pocket parks referred to in the plan. However, this can only be achieved as part of a package of development opportunities that are referred to in detail in the submission.</p>	<p>Noted.</p> <p>The provision of a 0.4 Ha park in this locality is supported. However, it is understood that this site is outside of the ownership and control of Solum Regeneration. Additionally, this does not overcome the issues raised previously.</p>
Quintain	Map 11.2	<p>We would be pleased to see the open space as permitted in outline on the NW Lands shown on Map 11.2. In addition, there is an area of open space to be delivered to the east of the Stadium within the Stage 1 Development Area. This space is referred to as First Square and should be shown on Map 11.2 to give a true indication of the open space secured in the Comprehensive Development Area through extant planning permissions.</p>	<p>Agree.</p> <p>Add First Square to map 11.21.</p>



Quintain	WEM36 and WEM38	WEM36 and WEM38 set out requirements that major new development provides new open space and food growing facilities. Such exceptional provision, which also includes the provision of play space in WEM40 and wildlife enhancements in WEM41, will have an impact on viability and thus will have an impact on Section 106 obligations, after CIL. We consider that this should be stated in the document.	<p>Additional section on investment priorities including viability to be included in new strategic chapter:</p> <p><u>Priorities for Investment may change</u>  <u>Priorities for infrastructure investment in the Wembley Growth Area include open space, play facilities, accessibility and cycling routes, wildlife enhancements, health, schools and community facilities. These are set out in the council's Infrastructure and Investment Framework (IIF). This document is subject to regular review.</u></p> <p><u>The AAP also sets out priorities for developer contributions, appropriate to the scale of the proposed development. Essential requirements include flood mitigation, transport improvements and affordable housing. Developers will also be encouraged to provide low-cost business start-ups, public realm improvements, public art, and connection to a decentralised energy system.</u></p> <p><u>Delivery of these investment priorities is dependent on resources and viability. Infrastructure will be delivered through the Community Infrastructure Levy and the IIF includes opportunities for funding sources to complement developer contributions. The council will work closely with delivery partners such as developers, Greater London Authority and Transport for London.</u></p>
Quintain	11.13	We are pleased to see that the Arena Square fountains are acknowledged as informal play space in paragraph 11.13.	Support welcomed
Environment Agency	WEM37	We support this policy particularly the reference to 'Semi-naturalization of the Wealdstone Brook.'	Support welcomed

Maddox Associates on behalf of Solum Regeneration	WEM37	The walkway along the Chiltern Embankment can only be created as part of the package of proposals put forward in my client's full submission. However, if these proposals do not proceed it is very unlikely that such a walkway can be brought forward, partly as a result of cost, but of equal importance the health and safety aspects given that this will be onto land alongside a busy railway line.	This has been discussed previously, whereby the provision of the new woodland walk is supported by the Council. However, it is considered that the benefits do not outweigh any potential harm in the absence of the formal consideration of the associated impacts. Furthermore, no financial viability information has been formally submitted or assessed and it is therefore not possible to fully comment on the deliverability of the woodland walk through cross-funding provided by the redevelopment of the Solum Regeneration land to the South of the Railway (Site W4) and a limited amount of development within Site W3.
TfL	WEM37 WEM41	<p>The Walkway through the woodland along Chiltern embankment is supported in principle by TfL as a way of reducing severance. Brent will need to consult with TfL, Network rail and Chiltern Railway to develop further options.</p> <p>If the pedestrian access to the northern part of the railway were to proceed there would need to be agreements with Network Rail and appropriate safety measure in place to prevent access to the tracks.</p> <p>TfL would encourage a legible London or similar way-finding approach which should be introduced through the industrial estate.</p>	<p>Suggested changes to para 11.10:</p> <p>There are a number of options for achieving this including creating new public open space and improving access to existing open spaces. Any improvements will require <u>consultation with key stakeholders</u>, initial investment and ongoing maintenance and management. Development contributions towards open space improvements will be included in appropriate site allocations.</p>
Brent Campaign Against Climate Change	WEM38	We welcome the proposal to include food growing areas in new development (WEM 38) and the use of temporary vacant spaces. However, we do not agree to the claim that restricted space means that such spaces cannot be provided in any new schools in the area. Raised beds do not take up much space and there are many imaginative solutions involving	<p>Support welcomed.</p> <p>Whilst food growing in schools is supported by Brent, it is more appropriately left to the discretion of the school rather than be required by planning policy.</p> <p>The council supports food growing schemes in appropriate</p>

		<p>containers, window boxes, growing walls etc that could be incorporated into new build. In addition the growing spaces in existing schools in the area show what can be done. Provision of demonstration food growing areas in newly created parks would be useful as well as support for finding food growing spaces alongside the Chiltern/Metropolitan and Jubilee railway lines.</p> <p>Food growing in schools raises awareness of the children about the impact of climate change and encourages healthy eating and a long term interest in gardening. It links with the curriculum and awards such as Healthy School and Eco School. The Council should be vigorously supporting it and making every effort to find food growing space for children.</p> <p>The Metropolitan Housing Trust is already working on these issues on the Chalkhill Estate with residents and are seeking additional growing spaces on the estate. Involvement of other housing providers should be sought.</p>	<p>circumstances, including on open land, adjacent to housing estates, providing that it does not result in a significant reduction in public open space.</p> <p>Your point about the provision of demonstration food growing areas is noted and will be passed on to Brent's Parks Service.</p>
Environment Agency	WEM41	<p>We support this policy. However, it is important a careful balance is struck between access for people and ensuring there are also quiet/isolated/undisturbed habitat areas so that wildlife will use these areas. Planning proposals should make provision for both of these needs wherever possible. We would welcome a reference to this 'careful balance' within the policy or guidance text.</p>	<p>Support welcomed.</p> <p>Suggested change to para 11.15: There are limited areas of nature conservation value in Wembley, reflecting its built up urban character. The main areas of habitat are the Chiltern line embankments, Wealdstone Brook and Brent River Park. There are also smaller wildlife pockets at St John's churchyard, Oakington Manor Primary School, Copland Community School, Ark Academy and the Metropolitan Line embankment. <del>Much of Wembley is considered to be</del> <u>When improving areas for</u></p>

			<u>wildlife deficiency t in areas of wildlife, a careful balance should be struck between ensuring separate undisturbed habitat zones and areas that people can enjoy and relax in.</u>
Environment Agency	WEM42 and supporting text	<p>We support this policy which seeks opportunities through development to restore the River Brent and Wealdstone Brook. We welcome the text in paragraph 11.18 which makes specific reference to the Water Framework Directive and the current status of the waterbodies. Our only query is with regard to the policy aims for each river. For the river Brent the aims are to have regard to its natural setting and enhance biodiversity – however, Annex B of the Thames RBMP indicates that renaturalisation is also a key measure to help this waterbody achieve ‘good’ status (e.g. removal of hard structures/banks, re-opening culverts). We would like to see ‘naturalisation’ included in the policy for the River Brent.</p> <p>The London Rivers Action Plan sets out the river restoration projects that are identified for the Wealdstone Brook and River Brent. Two of these projects are close to or within the Wembley Area. We would also like to see a reference to this action plan within the guidance text – <a href="http://www.thercc.co.uk/lrap">http://www.thercc.co.uk/lrap</a>.</p>	<p>Support welcomed.</p> <p>Suggested change to WEM42: Development proposals adjacent to the River Brent <u>and Wealdstone Brook should contribute to the naturalisation of the river have regards to its natural setting and enhance biodiversity.</u></p> <p>Add sentence to WEM42 supporting text: <u>The London Rivers Action Plan includes restoration projects for the Wealdstone Brook and River Brent. Two of these projects are within Wembley and any improvements to the rivers should be in line with this plan and the Brent River Valley chapter of Natural England’s publication London’s Natural Signatures.</u></p> <p>Add The Rivers Restoration Centre’s London Rivers Action Plan to AAP delivery mechanisms and supporting evidence.</p>
Canal & River Trust	WEM42 supporting text	<p>The Brent Feeder flows to the north east corner of the AAP boundary, and then beneath the land in a culvert. Within the AAP boundary it is owned and managed by the landowner(s), before it comes back into the Canal &amp; River Trust’s area of ownership. It is essential that the Feeder is maintained appropriately, and it should be mentioned within the AAP to make sure that developers are fully aware of</p>	<p>Suggest separating paras 11.17-19 into distinct paragraphs for Brent and Wealdstone:</p> <p>The River Brent and the Wealdstone Brook natural open spaces have an important role in providing open space provision, increasing biodiversity and reducing flood risk. They provide a natural landscape in an urban setting and offer a different type of open space in Wembley. The enhancement</p>

		<p>it. We mentioned this in our previous consultation response, and it was not included, so we would be keen to understand if there is a reason why this can't be taken forward.</p>	<p>and improvement of these natural open spaces will contribute towards combating the deficiency in the provision of open space in Wembley.</p> <p>The River Brent is a Site of Borough Nature Conservation Importance Grade I. The River Brent open space is poorly connected to the surrounding area and is under-used. <u>Opportunities to improve links and naturalise the River Brent will be considered through the development management process. The Brent Feeder, which is partly culverted underground, is owned and managed by landowners across the AAP area. It is essential that the Feeder is maintained appropriately.</u></p> <p>The Wealdstone Brook is a Site of Borough Nature Conservation Importance Grade II. Historically the Wealdstone Brook has been canalised and culverted along its length to make way for development. The Wealdstone Brook Restoration Study contains proposals for the improvements and restoration of the Wealdstone Brook. The proposals include the partial naturalisation of the Wealdstone Brook, tree planting to identify its location, a brook side walk, and ecological improvements. These proposals are accompanied by an indicative costing for each one put forward. Future regeneration should use the opportunity to restore the natural river corridor by partial naturalisation.</p> <p>Improvements to the River Brent and the Wealdstone Brook would help meet the requirements of the Thames River Basin Management Plan and the need to improve water quality. Under the Water Framework Directive (WFD), rivers and river bodies are assessed on their water quality. The assessment classified the River Brent as having a poor ecological status</p>
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			<p>and the Wealdstone Brook as having a moderate status. The WFD has set the objective for these to achieve a good status or good potential by 2027.</p> <p><u>The London Rivers Action Plan includes restoration projects for the Wealdstone Brook and River Brent. Two of these projects are within Wembley and any improvements to the rivers should be in line with this plan and the Brent River Valley chapter of Natural England's publication London's Natural Signatures.</u></p>
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#### Chapters 12-16: Site Proposals

Representor	Policy	Comment	Response
Solum Regeneration	W3	<p>The draft AAP states that this area would only support a very limited amount of new housing development. Rather, the Council seeks to maintain and enhance the area's nature conservation value, but also to provide public access through the site. Consequently, to meet these aspirations the site needs to be developed in tandem with the land to the south of the railway line to generate the necessary funding for ecological planting and maintenance works and public footpath provision.</p> <p>There is a lack of open space in Wembley and access to existing open spaces is limited. The strategic policies in the London Plan require open space deficiencies to be addressed. Whilst there has been some progress towards an increase in open space in Wembley, the expected population growth will</p>	<p>The council does not accept that the maintenance and enhancement of nature conservation value requires the site to be developed in tandem with the land to the south of the railway line. The council is supportive of measures to enhance the nature conservation value of the northern cutting and provide public access. However, the indicative proposals put forward by Solum Regeneration involve significant works to a large amount of land that has been designated as a Site of Importance for Nature Conservation and, whilst mitigation measures have been proposed, the proposals need to be formally evaluated.</p> <p>Addition to W3 text in light of flood risk analysis: <u>Site W3 is in a Local Flood Risk Zone (LFRZ) in the Wembley Stadium Critical Drainage Area (CDA) which has several areas of surface water flooding affecting property and critical infrastructure. Brent's Surface Water Management Plan</u></p>

		<p>require new open space. The need to enhance and improve public open space is also established in the adopted Core Strategy. Open space improvements have wider health and well-being benefits providing opportunities for active and informal recreation. The Council also has an aspiration to create a woodland walk way along the Chiltern Embankment (WEM37). By opening up the existing open space on our site to the public our scheme contributes significantly to the open space and wildlife policies of the Council. The report by Wardell Armstrong, ecological consultants suggests that there are opportunities for the enhancement to the area with the linkage of the northern and southern areas thereby providing a corridor for wildlife. Whilst, there will be also an opportunity for selective felling on non---native trees and enhancing those that remain to improve the wildlife value of the site. Rather, that the present position of an area where there is no active management and no public accessibility, which is seen by only a few residents rather than to the benefit of the wider community.</p>	<p><u>(SWMP) identifies mitigation measures for the LFRZ which include road side rain gardens, detention basins and re-profiling ground levels. Measures to alleviate surface water flooding will be required as part of the development of this site.</u></p>
Solum Regeneration	W4	<p>This site incorporates not only the land in the ownership of Solum but also all the land that fronts onto to the north of the High Road, which represents a number of diverse owners. It is acknowledged that the Council is seeking a comprehensive development of this site albeit this is likely to be a phased over a period of years.</p> <p>We envisage that this area will be redeveloped for a mix of town centre uses, with a retail frontage, and offices and residential above. Also, it is crucial that</p>	<p>The mix of housing units was discussed within the Wembley Link Masterplan which set out the following: "Although this is a town centre area where the provision of non-family housing may be the more obvious choice, careful design should not preclude the delivery of family housing. There are significant opportunities to create larger units with suitable amenity space in the form of ground floor units with gardens, and large apartments with generous balconies and terraces."</p> <p>It is considered that family housing can be delivered at higher densities and this is reflected by the London Plan density</p>

		<p>the development incorporates a link to encourage movement to, and from, the Stadium to Wembley Central.</p> <p>The draft AAP suggests an indicative number of 890 units on this site; however, this could only be achieved in a high density development of flats. The draft AAP confirms that the London Plan and Core Strategy CP2 requires that some 11,500 homes are provided in Wembley from 2007 to 2026. This should consist of some 50% affordable, but of equal importance is that 25% should be family sized properties namely three or more beds. However, to date, the vast majority of new housing in Wembley has been at the Quintain development, which it is acknowledged has been mainly flats. Consequently, to achieve the number of units envisaged in the draft AAP it will be necessary to continue this trend of an oversupply of one or two bedroom flats when the real demand is for much larger family units.</p> <p>Further, given the Council's aspiration for a dedicated pedestrian link from the Stadium to Wembley Central; this is likely to be a busy route, particularly during when there are activities at these venues. This will have serious implications for residential amenity, which does not seem to have considered in the plan. This can be dealt with satisfactorily with limited residential use, but becomes more difficult with the number of housing units envisaged by the draft AAP.</p> <p>The north of High Road is identified as a secondary</p>	<p>ranges. For example, the London Plan suggest densities between 175 and 355 units per hectare for sites with a "Central" character (averaging between 3.1 to 3.7 Habitable Rooms per unit) and 55 to 255 units per hectare if the sites are built out with an "Urban" character. The Council does not believe that the policies for density set out within the Brent LDF Core Strategy, the London Plan and within this document are not contrary to the policies regarding the provision of family housing.</p> <p>The potential for conflict between the nature of uses and the adjoining spaces is acknowledged by the Council. However, it is considered that this can dealt with through good design. The inclusion of non-residential uses on lower floors can help to provide separation between homes and busy roads and footways. Furthermore, homes can be designed with ventilation systems which allow windows to remain closed if the residents require further insulation to noise. These design features have been incorporated into the other new residential developments and those that have been granted consent in the immediate vicinity of the Stadium.</p> <p>The Council seeks to ensure the delivery of active town centre frontages on both sides of the High Road to provide a link between the existing town centre and the new town centre development near to the Stadium. The inclusion of a foodstore on either side of the High Road should help to increase footfall to this element of the High Road. However, the provision of the store on the South side (Site W5) would help to strengthen the frontage along the southern side while the northern frontage already includes a number of town centre uses.</p>
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	<p>retail frontage, so the proposals by Solum will lead to this being enhanced with the introduction of a foodstore on the northern part of the High Road, rather than being diluted with a food store on the south on site W5 as envisaged in the draft AAP.</p> <p>In our view, the combination of site W3 and W4 will lead to a greater footfall in the area as it will enable residents in the residential areas to the north to access the town centre more easily.</p> <p>There are two immediate junctions of importance in the consideration of proposals on this site, and equally for the development of W5 discussed below, namely Wembley High Road and Wembley Hill Road, and Park Lane and Wembley High Road. These junctions have been identified as requiring improvement in the AAP Preferred Option Report. However, work will be undertaken on the former junction as part of the Wembley Masterplan, and funds are understood to be available for these works</p> <p>The present indicative allocation of some 890 residential scheme would have a greater AM peak traffic generation than the proposals being proposed by Solum Regeneration an important consideration in this urban area. Further, the preliminary examination of a potential priority junction site access indicates that this would operate within capacity with minimal queuing. The highway issues are discussed more detail in the paper prepared by SKM Colin Buchanan that submitted as part of these representations.</p>	<p>Additionally, the indicative proposals put forward by Solum are likely to significantly impact upon an a designated Site of Importance for Nature Conservation.</p> <p>Traffic generation information would require formal consideration by the Council. However, it should be noted that the 890 residential unit project is for the entire area between the High Road, the Chiltern Railway tracks, Park Lane and Wembley Hill road and as such, a large number of the residential units that have been projected would come forward outside of their site. The area is appropriate for car free housing and this would reduce highway impacts.</p> <p>Addition to W4 text in light of flood risk analysis: <u>Part of Site W4 is in a Local Flood Risk Zone (LFRZ) in the Wembley Stadium Critical Drainage Area (CDA) which has several areas of surface water flooding affecting property and critical infrastructure. Brent's Surface Water Management Plan (SWMP) identifies mitigation measures for the LFRZ which include road side rain gardens, detention basins and re-profiling ground levels. Measures to alleviate surface water flooding will be required as part of the development of this site.</u></p>
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Solum Regeneration	W5	<p>We understand that there no current formal agreement between the Council, the owners of Brent House and Copeland School to undertake a joint development for a foodstore of some 6,000sqm as envisaged in the draft AAP.</p> <p>In our view, the necessary phasing of this development, in that the school has to be rebuilt prior to the existing school is demolished that sits on the High Road frontage, as well as Brent House, presently used by the Council for offices until 2013 is likely to result in the foodstore not opening until 2018/2019. At the same time, we believe that a foodstore in the Quintain development may also open further reducing the likelihood of a foodstore being developed on the Copland School and Brent House site.</p> <p>In addition, the draft AAP introduces a retail frontage along this part of the High Road, where at present there is none, and we think that this could dilute the benefits of a major food retail operator in the area, particularly with the aspiration to maintain the active retail frontage on the northern part of the High Road.</p> <p>We consider that there remains significant uncertainty whether this Copland School and Brent House proposal can be achieved given that the parties are not in any formal agreement and that there is a dependence on public funds for the redevelopment of the school, which is an important</p>	<p>The foodstore could be brought forward on the Brent House in insolation and therefore is not contingent on the delivery of Copland School. It could be brought forward imminently subject to planning consent and other normal development considerations. The delivery of the foodstore on the Brent House site could still help to cross-fund the delivery of the scheme. The council has started active marketing of the Brent House site.</p> <p>The inclusion of a food store at Brent House will benefit the town centre as a whole by providing an active link between the older part of the town centre on the High Road and the new shopping area adjacent to the stadium. This contribution to the link is not achieved as well by a new food store as proposed on the Cutting.</p> <p>The proposals for the provision of a foodstore within the Brent House site are far more advanced than those in relation to the Chiltern Cutting Sites. Both sites either adjoin or are within a designated town centre so are considered appropriate in terms of the general principle of the use. There are still significant issues that need to be resolved regarding the Chiltern Cutting site regarding access arrangements from the High Road, Highways matters, impacts on the designated nature conservation area and the principle of the significant redevelopment of that area. Both schemes have the potential to provide significant benefits. However, the Brent House scheme has been tested more thoroughly to date through the Wembley Link Masterplan. Whereas the Solum Regeneration Scheme has not and without the formal consideration of the potential impacts of the scheme, it considered that this cannot be included as a Site Proposal within the Area Action</p>
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		aspect of the Council's wish to improve and enhance the social infrastructure in Wembley. Indeed, the Council envisages that the redevelopment of Brent House may have to proceed alone.	Plan at this point in time.
Brent	13.2		Additional clarification sentence at end of 13.2:  <u>...Many of the sites are in the Strategic Cultural Area in which major leisure, cultural and tourism uses are encouraged.</u>
Quintain	13.4	We ask that paragraph 13.4 is deleted as neither the extent of the anticipated realignment of South Way nor its benefits are clear from the document. Also, its context with regard to extant planning permissions in this location should also be clarified.	
Quintain	13.6	Paragraph 13.6 should be redrafted as follows: <i>"Junction improvements to support development have already been secured through outline planning permissions. However, as further development is permitted in the immediate and wider area, road junctions adjacent to this site are likely to come under further pressure. Therefore, it may be necessary to identify and safeguard additional land to widen the road at the bridge and to improve the junction layouts at Wembley Triangle and between South Way and Wembley Hill Road depending on the type and quantum of development proposed. Potential land take is identified at Appendix C. Nevertheless, every effort will be made to deliver improvements within the existing highway boundary to avoid delays to the delivery of the Council's strategy."</i>	
Quintain	W6	There is an existing Outline Permission for the LDA	The site proposals are intended to provide guidance regarding

		<p>Lands which includes parcels to the south of the Chiltern Railway which provides for a quantum of development. We ask that '<i>a limited scale of development</i>' is clarified as mentioned in the text of W6 as without a fuller explanation it is not possible to properly consider the proposal. We also ask that the Council's concept of '<i>an employment hub</i>' is clarified for proper consideration and comment.</p>	<p>the scale and type of development that may be acceptable within a site and cannot include a significant amount of information. The extant outline permission for the LDA lands only included a limited scale of development to the south of the White Horse bridge, with the maximum height set at 52 m AOD (approximately 11 m above ground level). The reference to a 'limited scale of development' reflects the size of the development plots and the proximity to suburban residential dwellings.</p> <p>Addition to W6 text in light of flood risk analysis: <u>Site W6 is in a Local Flood Risk Zone (LFRZ) in the Wembley Stadium Critical Drainage Area (CDA) which has several areas of surface water flooding affecting property and critical infrastructure. Brent's Surface Water Management Plan (SWMP) identifies mitigation measures for the LFRZ which include road side rain gardens, detention basins and re-profiling ground levels. Measures to alleviate surface water flooding will be required as part of the development of this site.</u></p>
Quintain	W8	<p>Within Site Proposal W8 there is a 'requirement' that the 5-a-side football facility should be moved to a nearby site as plot W03 of the Stage 1 Development Area is developed. Whilst we support this aspiration, the arrangement with the operator is a commercial venture and it cannot be guaranteed that relocation will be achieved. There is also no planning justification for such a requirement. This statement should be amended to 'support' for relocation from the Council, for which we are grateful.</p>	<p>The suggested amendment is agreed.</p>

Quintain	W8	Also within W8 there is reference to the regrading of Royal Route to provide for public transport access. We ask that this is revised to remove the reference to public transport for the reasons set out above and instead refers only to vehicular access. Royal Route provides one of the main routes through to the Stadium and these and other types of vehicles will need to use Royal Route to access the parking and other facilities on the Stage 1 Development Area.	The approved Bus Infrastructure Strategy sets out that certain buses will be routed along the Boulevard. Whilst it is possible that revisions to the Strategy may be agreed between Quintain, TfL and the Council in the future, this site allocation reflects the approved strategy. The lowering of Royal Route so that it crosses the Boulevard at grade was an integral part of the Stage 1 consent and is required to create a successful environment and to facilitate bus access.
Quintain	W9	W9 – York House sets out a number of requirements in relation to the development of the current car park fronting Empire Way which serves the occupants of the building. These include ‘ <i>relatively low rise</i> ’ development and ‘ <i>a substantial area of open space</i> ’. We currently object to this Site Proposal. York House overlooks a newly created area of accessible open space and is a fifteen storey building. Neighbouring sites include the 8-storey Quadrant Court and the 14-storey Plaza Hotel, which itself sits on a development site with Outline Permission for an 8 – 23 storey structure. Further, the indicative development capacity given is substantially below that already permitted in the local area and those anticipated in the other Site Proposals, and is not in line with the adopted London Plan. It is therefore currently unacceptable.	Whilst the Council has made alterations to the gyratory adjacent to the site to create an area of public open space, there is still a significant deficit of such space in the local area. This site provides scope for the provision of publicly accessible open space between the buildings, particularly given the commercial nature of York House and the likely commercial uses that are supported on the ground floor of a new development in the car park. This is the only site in the vicinity that is likely to be available for development in the short to medium term that provides such scope whilst maintaining development capacity. The reference to a “relatively low rise” reflects the high rise nature of York House and to promote the provision of good levels of sunlight to existing and new open spaces.
Quintain	W10 W11	We support the principle of a community swimming pool being delivered on Dexion House. However, we note that whilst W10 (Dexion House) and W11 (Malcolm House) are deemed appropriate for residential development no indicative development capacity is given for either site. It is therefore not possible to comment fully on these Proposals and	The residential development capacity for Dexion House was established through the extant consent (129 units) which is due to expire in April 2013. The indicative residential development capacity for Malcolm House is 62 units.  Indicative development capacities to be included but with the

		<p>we currently object without acceptable justification. Further, in relation to W11 we would advise that the land shown in the Addendum to Appendix C is within our control and will be brought forward during the development of the NW Lands Outline Permission. It is not a requirement of the Malcolm House redevelopment. The text within W11 should be amended to remove the words '<i>on redevelopment of the site</i>' from the final sentence.</p>	<p>proviso "if residential included":</p> <p>Add to W10:</p> <p>Indicative Development Capacity (if residential) – 129 units</p> <p>W11</p> <p>It is accepted that the proposed junction improvement is not a requirement of the consented Malcolm House scheme therefore 'on redevelopment of the site' will be deleted from the site proposal.</p> <p>Add :</p> <p>Indicative Development capacity (if residential) – 62 units</p>
Quintain	W13	<p>The Site Proposal for W13 – Stadium Retail Park sets out the principle of mixed use regeneration but with a limited amount of residential. We would be pleased to understand the justification for this limit which is indicated at only 45 units per hectare. This is significantly below the site densities permitted elsewhere in the Comprehensive Development Area, which are in line with the adopted London Plan, and it is incomparable with the majority of densities set out in the Site Proposals for residential. We currently object to this without acceptable justification.</p>	<p>The specified residential development capacity (50 units) reflects the presumption that the redevelopment of this site will incorporate a predominance of commercial floorspace, as set out within the site proposal rather than be led by residential development. The site is an existing retail park and the council would wish to see any re-development of the site continue the shopping street northwards to link with Wembley Park. There is an opportunity on this site to help meet jobs targets for the regeneration of Wembley. It is important that there should be a mix of commercial floorspace and residential development across the area so that regeneration is genuinely mixed in use and that sufficient jobs are provided to meet the needs of local people. This site, given its proximity to Wembley Park station, is an ideal site to focus commercial elements on.</p> <p>It should also be borne in mind that the residential capacity</p>

			<p>are also indicative and that higher levels can be achieved where circumstances dictate.</p> <p>Addition to W13 text in light of flood risk analysis:  <u>The site is in flood zones 1 and 2. All proposed development will require a detailed Flood Risk Assessment (FRA), in accordance with Section 6.7 of the Brent Borough SFRA. The 'sequential approach' at site level should be applied to steer more vulnerable development such as residential, student accommodation, hotels, and certain community uses towards areas of lowest risk within the site; north west area and southern edge. Density should be varied to reduce the number of vulnerable units in high risk areas. Further site-specific details are set out in the sequential test assessment for the WAAP.</u></p>
Quintain	W14	<p>In relation to the justification for the connection for North End Road set out in W14, we would refer you to our comments in the Transport section above and also ask that it is made clear that the connection is required for further development that does not currently have outline or detailed planning permission. It is not required for developments that are currently consented.</p>	<p>A new road link at North End Road is a key component of the overall strategy enabling the promotion of highway access into Wembley (and beyond) from the North Circular. The MVA Transport Strategy Review (2008) stated that the link will benefit the whole development area during Stadium events. The link will help to reduce traffic along Neasden Lane and Forty Lane allowing prioritisation for non-car modes. The connection may also facilitate improvements to bus services, depending on results of the Bus Strategy. It is not required to facilitate development that is currently consented.</p> <p>Change to 13.41:          Because of the noise generated by the railway and station, <del>and the limited residential amenity, long term residential development of Arena House is not</del> <u>will only be considered appropriate on the site if it meets outdoor amenity space</u></p>

			<p><u>requirements and provides sufficient noise and vibration attenuation against the railway line...</u></p> <p>Change to W14 text in light of flood risk analysis:  <u>The site is in flood zones 1-3. All proposed development will require a detailed Flood Risk Assessment (FRA), in accordance with Section 6.7 of the Brent Borough SFRA. While the council considers that developing the site provides wider sustainability benefits to the community that outweigh flood risk, a 'sequential approach' at site level should be applied to steer more vulnerable development such as education, student accommodation and hotels uses towards areas of lowest risk within the site; to the western area. None of the proposed uses are compatible with flood zone 3b. Density should be varied to reduce the number of vulnerable units in high risk areas. A minimum 8 metres buffer zone must be provided for the waterway and development should contribute to the re-naturalisation of Wealdstone Brook. Further site-specific details are set out in the sequential test assessment for the WAAP. Any redevelopment of Crescent House should have regard to flood risk and flood risk assessment will be required. Opportunities to semi-naturalise the Brook and provide for public access will be sought on redevelopment of the site.</u></p>
Brent	W15	Flood Risk Analysis	<p>Addition to W15 text in light of flood risk analysis:  <u>The site is in flood zones 1 and 2. All proposed development will require a detailed Flood Risk Assessment (FRA), in accordance with Section 6.7 of the Brent Borough SFRA. The 'sequential approach' at site level should be applied to steer more vulnerable development such as residential, and hotel uses towards areas of lowest risk within the site; area from north west to south. Density should be varied to reduce the number of vulnerable units in high risk areas. Further site-</u></p>



			<u>specific details are set out in the sequential test assessment for the WAAP.</u>
Brent	W16	Flood Risk Analysis	<p>Change to W16 text in light of flood risk analysis:  <u>The site is in flood zones 1-3. All proposed development will require a detailed Flood Risk Assessment (FRA), in accordance with Section 6.7 of the Brent Borough SFRA. While the council considers that developing the site provides wider sustainability benefits to the community that outweigh flood risk, a 'sequential approach' at site level should be applied to steer more vulnerable development towards areas of lowest risk within the site; to the north. None of the proposed uses are compatible with flood zone 3b. Density should be varied to reduce the number of vulnerable units in high risk areas. A minimum 8 metres buffer zone must be provided for the waterway and development should contribute to the re-naturalisation of Wealdstone Brook. Further site-specific details are set out in the sequential test assessment for the WAAP.</u></p> <p><del>The council would wish to improve the setting of the Wealdstone Brook and the tree belt through the north of the site. Opportunities to semi-naturalise the Brook and provide for public access will be sought on any redevelopment of the site. Redevelopment proposals must be accompanied by a flood risk assessment.</del></p>
Quintain	W18	The Indicative Development Capacity set out for Wembley Retail Park at W18 is currently unacceptable as it is significantly below acceptable levels for the anticipated type of regeneration as set out in the adopted London Plan. In addition, we do not accept that the orientation of the park should be specified as east-west in the AAP. The urban design of the area will emerge in response to other permitted developments in the area and could be better orientated north-south. We would ask that	<p>The indicative residential development capacity reflects the high proportion of family housing (thus affecting the number of habitable rooms per unit), the domestic character (resulting in an "urban" character rather than "central" and the incorporation of the public open space within this site.</p> <p>The Council is strongly of the opinion that an east-west oriented park will receive significantly higher levels of sunlight than one oriented north-south due to the separation that is provided by Engineers Way. To achieve similar levels of</p>

		the space is specified as 'a new public open space with frontage to Engineers Way'.	sunlight with a north-south orientation would require significant separation between the park and the adjoining buildings which would significantly limit the development potential of the site. Furthermore, the east-west orientation allows greater connectivity to the school to be delivered at the eastern end of the site and to the residential development on the eastern side of the Stadium.
Quintain	W19 WEM27	<p>We do not support the Site Proposal for Wembley Stadium Car Park (W19) as a major leisure attraction. As stated above, the site currently has Outline Permission for mixed use regeneration, including aparthotel, office, residential and close care accommodation. It comprises half of the Stage 1 Development Area and provides a substantial proportion of the Stadium's Event Day parking. Given this and the ambitions for W28 to provide a transition between the mixed uses around the Stadium and the industrial estate to the east, including residential, we ask that the first sentence of W19 is amended as follows:</p> <p><i>"This site will provide a mixed use regeneration, including residential. A major leisure attraction as part of the mixed use regeneration is also sought. This will complement and add to Wembley's offer on stadium non event days."</i></p> <p>This would be in line with the Site Proposals for neighbouring sites in the Comprehensive Development Area and the ambition set out in paragraph 4.31, which anticipates that land east of Olympic Way will have a more residential character focussed around a newly created park.</p>	<p>The Council supports amendments to refer to the mixed use nature of the redevelopment of this site and that the provision of a major leisure attractor is supported.</p> <p>Changes to WEM27: <del>Leisure, Tourism and Cultural uses</del> <u>Strategic Cultural Area</u> Major leisure, tourism, and cultural uses are encouraged within the <u>Strategic Cultural Area</u> area shown on Map X. <del>Major leisure, tourism and cultural development is appropriately located on sites to the east of Olympic Way as shown on the Proposals Map.</del> <u>Leisure, tourism, and cultural uses can form part of a mixed use scheme, including residential where appropriate.</u></p> <p>Significant improvements to public transport will be required where development will attract a large number of trips.</p> <p>Change to W19: <u>This site lies within the Strategic Cultural Area where leisure, tourism and cultural uses are particularly encouraged. The site currently has permission for mixed use development including residential. A major leisure attraction as part of the mixed use regeneration is also sought to complement and add to Wembley's offer on stadium non event days.</u> <del>The Wembley Masterplan seeks the development of a major leisure attraction that will complement and add to Wembley's offer on stadium non event days.</del> It is likely that the site is large</p>

			<p>enough, and in such close proximity to the Stadium, that a multi use complex can be accommodated and serviced. The physical and operational relationship between any new development and the Stadium will require careful policy management and planning.</p>
Brent	W21	Flood Risk Analysis	<p>Change to W21 text in light of flood risk analysis:</p> <p>Redevelopment for residential use including at least as many family sized units as would be lost and associated amenity space. <del>Development should provide a buffer to the brook of at least 8 metres and semi-naturalisation of the brook will be sought.</del></p> <p><u>The site is in flood zones 1-3. All proposed development will require a detailed Flood Risk Assessment (FRA), in accordance with Section 6.7 of the Brent Borough SFRA. While the council considers that developing the site provides wider sustainability benefits to the community that outweigh flood risk, a 'sequential approach' at site level should be applied to locate homes towards area of lowest risk within the site; along Brook Avenue. The proposed use is not compatible with flood zone 3b. Density should be varied to reduce the number of vulnerable units in high risk areas. A minimum 8 metres buffer zone must be provided for the waterway and development should contribute to the re-naturalisation of Wealdstone Brook. Further site-specific details are set out in the sequential test assessment for the WAAP. <del>Proposals in Flood Zones 2 and 3 must be accompanied by a flood risk assessment and the sequential test and exception test should be applied. Development should not impede flood water flows and should not increase surface water run-off or reduce water storage. Basement dwellings will not be allowed in flood Zone 3.</del></u></p>

Brent	Map 15.1	Wembley Eastern Land	Site proposals (page 111) - amend W26 Watkin House to W26 Watkin Road.
Brent	W25	Flood Risk Analysis	<p>Change to W25 text in light of flood risk analysis:  <u>The site is in flood zones 2-3. All proposed development will require a detailed Flood Risk Assessment (FRA), in accordance with Section 6.7 of the Brent Borough SFRA. While the council considers that developing the site provides wider sustainability benefits to the community that outweigh flood risk, a 'sequential approach' at site level should be applied to steer more vulnerable development such as residential uses towards areas of lowest risk within the site; northern and southern areas. None of the proposed uses are compatible with flood zone 3b. Density should be varied to reduce the number of vulnerable units in high risk areas. Further site-specific details are set out in the sequential test assessment for the WAAP.</u></p> <p>Development should allow for a nodal point on the brook where the buffer strip should be widened to about 20 metres. Removal of part of the canalised wall and regrading of the bank to provide a more natural setting will be sought. The site would be suitable for housing facing the brook providing the restoration work is carried out.</p> <p><del>Proposals in Flood Zones 2 and 3 must be accompanied by a flood risk assessment and the sequential test and exception test should be applied. Development should not impede flood water flows and should not increase surface water run-off or reduce water storage. Basement dwellings will not be allowed in flood Zone 3.</del></p>

Brent	W26	Flood Risk Analysis	<p>Change to W26 text in light of flood risk analysis:  <u>The site is in flood zones 1-3. All proposed development will require a detailed Flood Risk Assessment (FRA), in accordance with Section 6.7 of the Brent Borough SFRA. While the council considers that developing the site provides wider sustainability benefits to the community that outweigh flood risk, a 'sequential approach' at site level should be applied to steer more vulnerable development such as residential, residential care homes, and certain community uses towards areas of lowest risk within the site; western and southern areas. None of the proposed uses are compatible with flood zone 3b. Density should be varied to reduce the number of vulnerable units in high risk areas. Further site-specific details are set out in the sequential test assessment for the WAAP. Proposals in Flood Zones 2 and 3 must be accompanied by a flood risk assessment and the sequential test should be applied. Development should not impede flood water flows and should not increase surface water run-off or reduce water storage. Basement dwellings will not be allowed in flood Zone 3.</u></p>
Brent	W27	Flood Risk Analysis	<p>Change to W27 text in light of flood risk analysis:  <u>The majority of the site is in flood zone 1; however there are small sections of flood zone 2 adjacent to the Wealdstone Brook. The buffer strip will remove the developable area of the site wholly into flood zone 1. Proposals must be accompanied by a Flood Risk Assessment. Development should not impede flood water flows and should not increase surface water run-off or reduce water storage.</u></p>
Quintain	W28	We welcome the ambition for mixed use regeneration to come forward on W28 (First Way), including residential, in order to provide an appropriate buffer between the development surrounding the Stadium and the industrial estate to	Support welcomed

		the east.	
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Chapter 17: Delivery and Monitoring – Chapter 18: Superseded Policies

Representor	Policy	Comment	Response
Quintain	17.3	Paragraph 17.4 states that, ' <i>Wembley is providing half of the Borough's new housing growth and most of the commercial growth</i> ', and we are pleased to see the acknowledgement in paragraph 17.3 that the delivery of the vision for Wembley is reliant on implementation of the AAP by private sector developers and landowners. To that end, we look forward to participating further as the AAP is developed to ensure that it delivers the anticipated growth for Wembley and Brent as a whole.	Support welcomed Add text at appropriate place on page 123 to explain how we monitor this <u>The transport target to reduce the mode share of car trips from 37% towards 25% will be monitored using the outcomes of travel plan monitoring which is undertaken annually as part of the obligation on developers to report on progress made towards their travel plan targets.</u>

Chapter 19: Glossary

Representor	Policy	Comment	Response
MOPAC/MPS	Glossary	The MOPAC/MPS note that the glossary does not include a definition of social infrastructure, nor are policing facilities included within the Social Infrastructure chapter of the draft AAP. The addition of 'policing' within the definition of social infrastructure is concurrent with the NPPF, in particular paragraphs 69 (as outlined above) and 156 which requires LPAs to set out strategic priorities in the Local Plan to deliver the provision of health, security, community and cultural infrastructure and other local facilities. It is clear that community	Agree.  Add to Glossary: Social Infrastructure: Covers facilities such as health provision, early years provision, schools, colleges and universities, community, cultural, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities.

		<p>facilities include security and by definition, policing. The MOPAC/MPS therefore recommend that the Glossary includes a definition of social infrastructure in line with the adopted London Plan definition, as set out below:</p> <p>Social Infrastructure: Covers facilities such as health provision, early years provision, schools, colleges and universities, community, cultural, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities.</p>	
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#### Chapter 20: Land Take Maps

Representor	Policy	Comment	Response
Quintain	Land Take Maps Appendix C	In terms of the land take maps at Appendix C and as amended, the Empire Way / Engineers Way drawing appears to replicate the position agreed between us and we would be pleased if you could confirm this. If the Council is seeking additional land then we need to be consulted on the proposals and to understand the justification for amending the junction improvements from the agreed position. Similarly, the First Way / Engineers Way junction proposals are known to us through the Stage 1 S106 Agreement and subsequent discussions with the Council in relation to the School Site. If the proposed land take is increased from the agreed position we need to be consulted and we respectfully point out that we have an extant permission that can be implemented.	We confirm the maps represent the agreed position.
UKI (represented by DP9)	Map 20.4	Map 20.4 includes a strip of land identified for	The Wembley Area Action Plan is an important opportunity to

		<p>safeguarding along the northern edge of the Kelaty House site. Given the form of the scheme at Kelaty House, this land is no longer available and should be removed from the plan. This is due to the positioning of a building on this part of the site. As an alternative, it is expected that the Council will explore other options to deliver the required improvements to this part of the highway. This was noted in the officer's report when the scheme was considered at committee on 22 August 2012. The report commented that further consideration and analysis needs to be completed by the Council should this land not be available. It is expected that this further analysis will be completed to inform further drafts of the Wembley AAP, which will safeguard land to deliver this Council aspiration.</p>	<p>define which pieces of land would be required to deliver the transport strategy for Wembley.</p> <p>In the case of the land on the southern edge of Fifth Way which is occupied by the Kelaty House, the plan is not yet adopted and therefore planning approval was given for the development.</p> <p>However, the preferred option for delivering the transport strategy for Wembley still remains the land to the south of Fifth Way. An alternative scheme using land to the north of Fifth Way (occupied by the Europarts site) has also been investigated.</p> <p>Both pieces of land will be retained within the plan in the event that the developments on either site don't come forward in their full/envisaged form, or the timescales are protracted.</p> <p>Add text on p134 after 20.4. <u>"This map shows alternative options, so that if development comes forward in this location, then some flexibility is built in to provide the necessary transport improvements"</u></p>
Quintain	Maps 20.5 and 20.6	<p>We note the proposed revisions to the LDA Lands land take at the junction of South Way and Wembley Hill Road and in order to deliver the widening of the Chiltern Railway Bridge as shown on Maps 20.5 and 20.6 as amended. The current Outline Permission on the LDA Lands provides for improvements to the Triangle and South Way / Wembley Hill Road junction and these improvements have been agreed with the Council as fully mitigating the impacts of the currently permitted development within the Comprehensive Development Area. We note also that land is required for an improved bus interchange in this area and the proposed restriction on car park access to avoid conflict with Stadium</p>	<p>The land requirements shown in map 20.5 and 20.6 will permit the junction improvement at Wembley Hill Road and South Way to be undertaken. As development at Mahatma Gandhi House and LDA Lands is taken forward, we would also look to make provision for a bus interchange and for taxi drop off for stadium events. Definite land requirements have not been confirmed yet for this, and these would be negotiated with developers on re-development at these sites.</p> <p>Add following text to that at 20.6 <u>"current outline permission on the LDA Lands provides for the improvements at the Triangle, and South Way / Wembley Hill Road. Some further land may be required along South Way for other transport facilities including bus stops, and taxi drop offs."</u></p>



		visitors on Event Days. We cannot comment fully on the proposals without reviewing the justification for these alterations and we ask that this additional information is made available for full consultation.	
Quintain		We ask for confirmation that the land take identified along the northern edge of the Kelaty House site has been preserved as part of the recent planning permission (ref: 12/1293).	The land shown as being required from the northern edge of the Kelaty House site has been retained along with an alternative provision on the opposite (northern) side of Fifth Way. This is to give flexibility if the development at Kelaty House comes forward in a different way or timescales become extended.
Quintain	Map 20.7 Site W4 Site W5	Map 20.7 shows land take for W4 in order to deliver improvements to the Wembley Triangle junction. According to paragraph 6.15 improvements to the Triangle are required <i>'to mitigate against the impacts of traffic generated from developments'</i> . Improvements to the Triangle have been secured through the Outline Permission for W6 (South Way / Wembley Stadium Station). Further work carried out as part of the Transport Assessment in support of the NW Lands application showed that appropriate junction improvements could be delivered within the highway boundary to fully mitigate the impact of permitted development in the regeneration area. These improvements are agreed with the Council. Identifying land outside the Council's control is likely to delay delivery of the improvement and impact adversely on the delivery of the Core Strategy. We ask that any junction design that requires land outside the Council's control is carefully scrutinised and considered fully against the merits of a solution that does not require third party ownerships. We would be pleased to be involved in that scrutiny, particularly as cash contributions towards the	It is accepted that a junction improvement can be delivered at the Triangle using land already identified through the Outline Permission for W6 (South Way / Wembley Stadium station). The identification of the land on Map 20.7 gives the flexibility, if required, for an option for the longer term, which will provide additional highway capacity, if required. The junction improvement which relies on the land not within third party ownerships will be progressed first, and only if this improvement is not providing the necessary benefit, will be other option be considered longer term. Funds from the NW Lands S106 agreement would not be used to pay for acquiring this additional land.  Amendment to the text in site W4. Add the following after the last sentence: <u>"In the longer term, if there was comprehensive re-development on this site, the council would seek to acquire this small portion of land to facilitate additional junction improvements beyond those already identified for the Wembley Triangle as part of existing permissions."</u>

		<p>delivery of highways improvements secured through the NW Lands S106 Agreement are targeted to pay for improvements to the Triangle junction before development comes forward on the LDA Lands. We do not want to see our money diverted into acquiring land that previously has been proven and agreed not to be needed; nor would we want to see regeneration and the delivery of the Council's Core Strategy unduly delayed. In relation to this, we note within W5 that a car park is envisaged to serve a new foodstore and other town centre uses on the Copland School / Brent House site. We ask to see analysis that proves that this additional capacity requirement can be accommodated in improvements to the Triangle junction within the highway boundary.</p>	
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