London Borough of Brent
Core Strategy : Tall Buildings
Contents

i) Background

1.0 The Borough’s Historic Environment

1.1 Understanding the Assets
1.2 Conservation Areas
1.3 Listed Buildings
   1.3.1 Wembley Masterplan Area
   1.3.2 South Kilburn Masterplan Area
1.4 Locally listed Buildings

2.0 Tall Buildings: Plan-led control

2.1 General Protection Policies
2.2 The London Plan
2.3 PPS 15
2.4 Core strategy

3.0 Tall Buildings: Planning Guidance

3.1 Growth Areas
3.2 Wembley Masterplan Area
3.3 Wembley Town Centre
3.4 South Kilburn
3.5 Burnt Oak/Collindale

4.0 General development Guidance/ SPD

5.0 Professional Resources

6.0 Summary
i) Background
The London Borough of Brent has a diverse townscape character defined by the large speculative 1930's dormer settlements of Kingsbury, Queensbury and Kenton in the north and the urban centres of Wembley and South Kilburn closer to the centre of London. Such a diversity of urban form has led the Council to establish a tall buildings policy based on an in depth understanding of the different localities within which such developments may occur. Following detailed urban design analysis it has become apparent that a ‘tall’ building within a suburban context may be substantially different to one that is located in the more densely populated south of the Borough. In developing a Plan-led strategy for the careful integration of tall buildings across the Borough, the Council has taken a three stage approach.

Firstly, it has been necessary to develop an in depth understanding of the general character of the Borough and identify the quality of the built environment; not only in general, but more specifically the role of the historic environment in contributing quality and character of Brent; as a place in itself and as an integral part of London.

Secondly, the Council has identified the threats and opportunities that tall buildings bring and developed general guidance for the assessment of sites and areas in developing proposals for tall buildings.

The third level of assessment has been to identify the core Growth Areas within the Borough. These are areas considered to be most in need of regeneration, with the capacity to accommodate significant development and housing growth. All Growth Areas have been subject to rigorous urban design studies which have informed the development of proposals for specific area based regeneration. The identification of these areas underpins Brent’s Spatial Strategy: Delivering Sustainable Places. The Core Strategy DPD explains the fundamental requirements of context, infrastructure and design in such locations. Such requirements have been informed by comprehensive urban design analysis and a range of material that will be identified and explained throughout this report. The development of the LDF for Brent has relied on a reduction in detailed regulation and an increase in guidance to make it a more effective planning instrument.

This three stage assessment has enabled the Council to understand the strategic implications of tall buildings for Brent, establish the design problems of introducing them in to the landscape and produce planning standards and guidance to ensure that they are a positive intervention into the fabric of the Borough.

This paper will expand upon the three stages of assessment in greater detail and explain the processes by which Brent has established its planning framework for the control and management of tall buildings throughout the built environment.
1.0 The Borough’s Historic Environment

The London Borough of Brent has established its relatively recent built landscape in two surges of development. Firstly, the Victorian railway expansion along the Metropolitan Line west through Willesden, and later, in the first part of the Twentieth Century, the suburban estates north of Wembley. This pattern of development means that Brent does not enjoy as rich an historic environment as many Boroughs closer to the centre of London; the historic asset in Brent is relatively small and relatively late in character. However, the Council does value the contribution of its historic environment to the overall character of the Borough and has independently established a comprehensive record of its historic assets. As required by PPS 12 (Para. 8.1) the Council has identified its areas of special protection including Conservation Areas, Listed Buildings and Locally Listed Buildings.

1.1 Understanding the Assets

The Core Strategy and the emerging “Development Management” DPD will record the Borough’s assets in relation to the built environment and clearly establish the areas of historic sensitivity. However, the Council has realised that an understanding of the role and character of these areas and buildings is critical in helping to establish parameters for development and the regard for context that is essential for the development of buildings and landscape design.

1.2 Conservation Areas

The Borough has 22 Conservation Areas with varying characters and with different levels of preservation. In order to establish level of preservation and the essential prevailing character the Council has carried out Character Appraisals of all its Conservation Areas identifying the surviving elements of these areas that led to their original designation. These Character Appraisals will be used to establish the contextual criteria by which the principles of “Guidance on Tall buildings 2007” (CABE and EH), can be applied, particularly in terms of the impact on views into and out of established conservation areas. Unless there are exceptional circumstances of community benefit and impacts can be managed, the Council would actively resist tall buildings within the majority of its Conservation Areas.

It is unlikely that the Council would support tall buildings within detrimental proximity of its residential Conservation Areas; within the declining town centre Conservation Areas of Willesden and Harlesden taller buildings may be appropriate in certain strategic locations where slightly denser developments would bring a range of other significant benefits to the area. The Conservation Area designation is in many ways a very positive element in the management of tall buildings in that it helps derive the quality agenda and manage the scale expectations of developers. The late 1870’s shopping ranges of Harlesden and Neasden are tired and declining but the Conservation Area designation will help the way in which these areas develop enabling them to secure much higher quality, better designed “Taller” buildings than equivalent areas without the designation.
The Borough’s Conservation Areas are fully protected in terms of development control management and the table below indicates the Councils commitment to the understanding of character its role in policy development and subsequently controlled development of Conservation Areas:

<table>
<thead>
<tr>
<th>Conservation Area</th>
<th>Article 4 Direction</th>
<th>Character Appraisal</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.1 Sudbury Court.</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>6.2 Mapesbury.</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>6.3 Queens Park.</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>6.4 Northwick Circle.</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>6.5 Mount Stewart.</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>6.6 Barn Hill.</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>6.7 Roe Green.</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>6.8 St Andrews.</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>6.9 Kensal Green.</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>6.10 Kilburn.</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>6.11 Buck Lane</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>6.12 South Kilburn.</td>
<td>All Listed Buildings</td>
<td>✓</td>
</tr>
<tr>
<td>6.13 North Kilburn.</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>6.14 Harlesden.</td>
<td>(Retail town centre)</td>
<td>✓</td>
</tr>
<tr>
<td>6.15 Willesden.</td>
<td>(Retail Town Centre)</td>
<td>✓</td>
</tr>
<tr>
<td>6.16 Brondesbury.</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>6.17 Neasden Village.</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>6.18 Wembley High Street.</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>6.19 Lawns Court</td>
<td>(Apartment block)</td>
<td>✓</td>
</tr>
<tr>
<td>6.20 Sudbury Cottages.</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>6.21 Homestead Park.</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>6.22 Paddington Cemetery.</td>
<td>(All Listed Buildings)</td>
<td>✓</td>
</tr>
</tbody>
</table>

Overall, The Council will resist tall buildings in its Conservation Areas but must be realistic about the need for town centre regeneration and the provision of homes within declining communities. However, good urban design and historic environment practice through the guidance of PPS 15 will ensure that taller buildings will enhance the character of our important but declining town centres.

The Borough’s historic residential areas that do not enjoy statutory protection, but may have the potential to be given a designation are known as Areas of Distinctive Residential Character. In such areas the Council will apply the guidance described in Core Strategy policy CP17.
CP 17
Protecting and Enhancing the Suburban Character of Brent
The distinctive suburban character of Brent will be protected from inappropriate development. The council will bring forward design guidance that limits development, outside of the main town centres and away from corner plots on main road frontages, which would erode the character of suburban housing. Development of garden space and infilling of plots with out-of-scale buildings that do not respect the settings of the existing dwellings will not be acceptable. The council supports emerging London Plan policy to limit the inappropriate development of back gardens that erode the character of suburban areas.

1.3 Listed Buildings
In comparison to many London Borough’s Brent has a relatively small stock of Listed Buildings and the majority are single buildings usually listed for their architectural merit or historic associations. There is only one example of group value listing in South Kilburn, and the terrace in Princess Road enjoys not only general development control management protection but is nurtured by historic environment Masterplan requirements

The broad dispersion of the Borough’s listed buildings means that proposals for tall buildings may offer more of a localised individual threat, in that defending a refusal of permission based on the impact on one isolated listed building is more difficult than the broader impact that may be manifest on a group.

After detailed survey and assessment work it has been established that the listed buildings identified below are subject to the most threat from the development of tall buildings as they are within a Borough growth area. The remaining listed buildings are located within established residential areas where the impact can be more easily protected. The listed buildings identified as vulnerable to future tall buildings development include:

1.3.1 Wembley Masterplan Area

Analysis of Identified potentially vulnerable Listed Buildings:

The Empire Pool (Wembley Arena) Grade II

Brent Town Hall, Wembley Grade II

Wembley Arena is the focus of the new Wembley Masterplan area and as part of a nationally important growth area producing a large number of new homes and associated infrastructure it will be subject to significant development pressure. However, it is the very momentum of the Masterplan development that has increased the buildings value, enabling a viable restoration. The building has also benefited from a new high quality landscape in which it now sits. The Masterplan
has assessed the role of the building within Wembley and established parameter guidance for the height of buildings around it. The Council is not unduly worried about the impact of tall buildings because the building itself is extremely large and tall, it sits on a raised plinth of nearly two storeys and enjoys a substantial separation buffer from other buildings of a large civic square. The adopted Masterplan allows plan-led management from the integration of its proposals and guidance with the requirements of the Core Strategy and associated Development Plan Documents. The Town Hall is sufficiently isolated within an established residential part of Wembley for there not to be an issue of proximity but more of an impact on views.

1.3.2 South Kilburn Masterplan Area

Kilburn Park Underground Station, South Kilburn  Grade II
Prince of Wales Public House, South Kilburn  Grade II
Cambridge Gardens 1,2,24 and 25  Grade II
Cambridge Gardens 12-18,  Grade II
Cambridge Avenue 10 South Kilburn  Grade II
Cambridge Avenue 18-56 South, Kilburn  Grade II
Cambridge Avenue 61 And 63 South Kilburn  Grade II
Princess Road 11 And 13, South Kilburn  Grade II
Princess Road 15-29, South Kilburn  Grade II
Princess Road 22-30 South Kilburn  Grade II
Princess Road 32-84  Grade II
Princess Road 45-67  Grade II
Cambridge Hall, South Kilburn  Grade II

The public houses, Underground station and late Victorian town houses within South Kilburn have been identified as a primary consideration of the master planning process; the Masterplan and associated Supplementary Planning Documents identify the risks to the historic environment and illustrate the importance of listed buildings in the creation of a viable, successful and distinctive community. The buildings are somewhat isolated from the tall Bison Blocks of Kilburn Park Road which allows the designers to repair some of the damage done in the 1960’s.
It is widely recognised that the incorporation of tall buildings will be necessary to provide the desperately needed new homes and supporting infrastructure. The Council and its consultants have produced two Masterplans and an SPD to help the sensitive integration of the historic environment into the new revitalised South Kilburn. The Masterplan has identified the vulnerable elements of the historic environment within Kilburn and ensured its primary consideration in the design and development control process as the Masterplan is built out.

Overall, the Listed Buildings that may be potentially vulnerable to the erection of tall buildings within their proximity or within their immediate and broader settings are within recognised Growth Areas that already have plan-led guidance to ensure sensitive development. Area specific guidance in the form of Masterplans and broader urban design studies have all been produced in line with the English Heritage and CABE ‘Guidance on tall buildings’ with particular reference to sections 2.6 and 2.7 as will be discussed later in this report. Where they are not subject to specific guidance, and in a more isolated locations, the Council will always apply the principles from “Guidance on tall buildings” (CABE and EH, 2007) and the national policies and guidance contained in PPG15/PPS 15.

The Council has consulted English Heritage on the proposals for the 2005 and 2007 Masterplans to which no objection was raised and further developments of the Masterplan mean that building scale and massing will be reduced further subsequently reducing impact on the historic environment.

1.4 Locally Listed Buildings

Brent Council has adopted a register of historic buildings that it considers play an important role in establishing and maintaining the quality of the Borough’s built environment. Although they may not be of sufficient architectural or historic merit to warrant statutory protection, they represent a context that needs consideration and sensitivity. It is proposed that the LDF will deal with the impact of development upon historic buildings through policy DP UD 17 of the draft Development Policies DPD. The schedule of listed buildings is contained in Appendix UD 14.

Policy DP UD 17 Locally Listed Buildings

The special character of buildings on the local list will be protected and enhanced. Proposals for the unsympathetic alteration of locally listed buildings (including parts of buildings) will be resisted. Permission will not be granted for demolition (see DP H1) and redevelopment of a locally-listed building unless:

a. Prior contact is made with the planning authority to discuss the proposed replacement, prior to any demolition;

b. A viability statement is submitted (addressing alternative uses considered, and demonstrating that the planning benefits for the community substantially outweigh the loss from demolition)
c. The proposed replacement provides a building of greater architectural quality, which enhances the special character of its predecessor’s contribution to the locality;
d. In consideration of its merit, role & contribution to local distinctiveness, construction of any replacement is brought forward expeditiously, avoiding a long-term ‘gap site’ in the locality.
To facilitate the viability of retention and reuse of locally-listed buildings, sympathetic extensions with higher density may be permitted. Agreed design standards & community benefits may be secured through a Planning Agreement.

2.0 Tall Buildings: Plan-Led Control

2.1 General Protection Policies
Elements of the historic environment that are not directly protected from the impact of tall buildings by specific area based policies or guidance are safeguarded from the more negative of impacts of tall buildings by general urban design policies. These can be found both within the Core Strategy and the Development Policies DPD. (reproduced below)

Policy DP UD 2 Townscape: Local Context & Character
Proposals should be designed with regard to their local context, making a positive contribution to the character of the area. Account should be taken of:

a. The existing landforms and natural features;
b. The need to respect or improve the quality of existing urban spaces, materials, townscape or historical features which contribute favourably to the character of an area; and

Policy DP UD 2 Townscape: Local Context & Character

c. The opportunity for improvement or variety within an area of poor or uniform character, by creating a new area of distinctive quality on suitable sites.

Proposals should not cause harm to the character and/or appearance of an area, or have an unacceptable visual impact on Conservation Areas, Areas of Distinctive Residential Character, Listed Buildings, Views, Landmarks, Green Chains or Metropolitan Open Land.

Application of these criteria need not preclude the sensitive introduction of renewable technologies, innovative contemporary designs and designs which reflect the cultural diversity of the area.
CP 6 Design & Density in Place Shaping

Proper regard shall be made to the London Plan density Policy 3A.3 which supports higher densities in areas of good public transport accessibility. The council will also take into account the following criteria to ensure that a notional density figure is not the only consideration, and the quality of design, location of the site and the need to provide family housing are all important. It is important that the following factors are taken into account in determining density and requiring good design:

Where design is of the highest or exemplary standard, higher densities will be considered.

Higher densities may be acceptable where PTAL levels would be raised as a result of development or through committed transport improvements.

The site should contribute towards wider public realm improvements commensurate with the scale of development.

Development in growth areas should take into account the suburban interface.

On appropriate sites a reasonable proportion of family housing meeting amenity/open space standards should be properly accommodated (see policy CP21).

The council will take into account place making objectives, as set out in policy CP5, in determining density levels.

Tall buildings are acceptable in identified areas of Wembley, South-Kilburn and Burnt Oak and in defined areas in Alperton and Park Royal.

The council will use design review panels, architectural competitions, design guidance and design protocols to improve design quality; and.

Schemes will be assessed having regard to CABE’s design guidance.

2.2 The London Plan

Brent’s Submission version Core Strategy will be an integral part of the London planning policy framework, integrating the Borough’s local aspirations with those of the regional requirements of the London Plan. Therefore, quite rightly, in considering the Borough’s emerging LDF, the Planning Inspectorate has encouraged the Council to remove any policies or guidance that may replicate the directions of the London Plan. The Core Strategy document refers to the London Plan 4. C 10 and 4.B 8 and has considered that:
Any proposals for the development of tall buildings “should consider whether their designs are acceptable in terms of design and impact on their surroundings” The Council considers this an essential part of its development control assessments and that any established historic context is not only safeguarded by this policy but also by the extra protection provided by the Councils Core Strategy policy CP6 (which directly refers to “Guidance on Tall buildings 2007” [CABE and EH]).

The Council has also been mindful not to create a Borough wide height limitation, recognising the diversity of its built landscape. The Borough has large areas of economically compromised land that has no historic significance or survival that are essential to the regeneration of Brent. These locations offer important opportunities to enable taller buildings to come forward, thus reducing the development pressure on more sensitive historic areas. This releases the Council to concentrate its limited resources on providing guidance on tall buildings in some of its Growth Areas where the historic environment thrives. The areas where the historic environment requires special attention within the Borough are Wembley and South Kilburn. Although there are some significant implications within Wembley, it is South Kilburn that has the greater historic assets to consider.

The protection of specific views into, through and across the Borough is important and the Council has taken steps to protect not only views out of and into its historic areas but understand the implications for the creation of more and/or improved views that may result from future tall buildings.

In progressing the strategic aspirations of London Plan Policies, the Council has carried out specific analysis of a number of areas that it has identified as suitable for taller buildings. Significant urban design analysis has been undertaken along with testing of the impact of taller buildings in general and specifically on the historic environment. The specific studies are cited and discussed in Section Three of this paper.

2 The specifics of design for a compact city (The London Plan)

Policy 4B.8 Tall buildings – location

The Mayor will promote the development of tall buildings where they create attractive landmarks enhancing London’s character, help to provide a coherent location for economic clusters of related activities and/or act as a catalyst for regeneration and where they are also acceptable in terms of design and impact on their surroundings. The Mayor will, and boroughs should, consider all applications for tall buildings against the criteria set out in Policies 4B.1, 4B.3 and 4B.9. The Mayor will work with boroughs and the strategic partnerships to help identify suitable locations for tall buildings that should be included in UDPs and Sub-Regional Development Frameworks.
These may include parts of the Central Activities Zone and some Opportunity Areas. Boroughs should take into account the reasons why the Mayor may support tall buildings when assessing planning applications that are referable to the Mayor.

Boroughs may wish to identify defined areas of specific character that could be sensitive to tall buildings within their UDPs. In doing so, they should clearly explain what aspects of local character could be affected and why. They should not impose unsubstantiated borough-wide height restrictions.

In considering applications for tall buildings, the Mayor will take into account the potential benefit of public access to the upper floors and may require such access.

2.3 PPG/PPS15

In developing its policy and practice approach to the protection of the historic environment the Council has been mindful of the emerging PPS 15 and its proposals for a co-ordinated approach to the management of historic assets. The Council supports the approach of providing practical guidance that not only provides for the preservation of the historic environment but enables sustainable development to enhance the importance of historic assets in preserving character and defining “Place”. The Council will draw upon the following principles for the PPS and its supporting document “Good Practice Guide” to help with the protection of the historic environment from inappropriately tall buildings. The Council will adhere to the fundamental principles of:

2.3.1 National, regional and Local Policy

Ensure Local Policy is intertwined and does not replicate with broader national and regional policy structures and supports the fundamental requirements of PPS1.

2.3.2 Audit and Integration

The management and control of the historic environment must include basic understanding of the asset from thorough audit and assessment and its integration into a coordinated planning control process.

2.3.2 Asset Credibility and Value

The Borough has a very diverse quality of historic assets and supports the principle of valuing what are valuable not just valuing assets because they are from a particular period of time.
2.3.2 Pre application Liaison

The Planning Service has a well established and practiced pre-application consultation system with the skilled and experienced officers who will secure the protection and setting of historic assets in line with PPS15 HE11.

2.3.2 Identifying the Assets

The development of the LDF, the Proposals Map and subsequent inset maps will allow the Council to identify the historic asset and relate them to SPD and Character assessment.

2.4 Core Strategy

In order not to replicate the strategic aspirations of the London Plan the Core Strategy has taken the fundamental principles of its policies and applied them to the assessment of the impact of tall buildings within the Borough through its consideration of specific growth area policies CP7 to CP13. The impact of tall buildings has been established through detailed urban design studies and the development of Masterplans and planning guidance that are, or will become Supplementary Planning Documents.

The Council has identified acceptable locations for tall buildings and where relevant these are highlighted in the Growth Area policies. In determining planning applications for tall buildings the Council will have regard to London Plan policy 4B.9 and the joint English Heritage and CABE Guidance on Tall Buildings (2007).

The Core Strategy has identified the following parts of Brent as areas of potential growth. They will all contribute to the delivery of new homes, jobs and infrastructure and the policies indicate the Council’s strategic planning requirements of these areas. Only a small number of the growth areas have an established historic environment worthy of preservation. However, all of these areas are the subject of completed or ongoing urban design analysis to establish the potential role that tall buildings can play. The studies will identify the suitability of tall buildings, their appropriate locations and appropriate heights relative to context. In carrying out these studies it has become evident that the most challenging and demanding studies were within the areas that have a surviving historic environment.
<table>
<thead>
<tr>
<th>Policy</th>
<th>Area</th>
<th>Extent of historic asset</th>
</tr>
</thead>
<tbody>
<tr>
<td>CP7</td>
<td>Wembley</td>
<td>some significant historic assets</td>
</tr>
<tr>
<td>CP8</td>
<td>Alperton</td>
<td>no historic assets</td>
</tr>
<tr>
<td>CP9</td>
<td>South Kilburn</td>
<td>some significant historic assets</td>
</tr>
<tr>
<td>CP10</td>
<td>Church End</td>
<td>some minor implications</td>
</tr>
<tr>
<td>CP11</td>
<td>Burnt Oak / Collindale</td>
<td>some minor implications</td>
</tr>
<tr>
<td>CP12</td>
<td>Park Royal</td>
<td>no historic assets</td>
</tr>
<tr>
<td>Cp13</td>
<td>North Circular Road</td>
<td>no historic assets</td>
</tr>
</tbody>
</table>

The studies and guidance documents are discussed in more detail in Section 4.0 of this report, where the guidance documents are cited and explained in relation to Brent’s Local Development Framework. Overall these documents build upon the Council’s desire to create places that will build upon existing assets within the built environment and improve existing poor landscape quality to deliver high quality, sustainable communities throughout the Borough. The founding policy for this is CP6, which is specific about the significant role of the guidance produced by the Commission for Architecture and the Built Environment in fundamental requirements of design standards.

### 3.0 Tall Buildings: Planning Guidance

#### 3.1 Growth Areas

To build upon and develop the general guidance given within the Core Strategy and the DPD Development Policies, the Council has undertaken a number of studies to establish the impact of tall buildings within specific areas of the Borough - as listed in Section 3.3. These documents will add the detail to the strategic role of the Core Strategy and the regional guidance discussed in Section 2.0. There has been a substantial amount of work both from consultants and Council officers to not only understand the design implications of tall buildings, but also the socio economic benefit or otherwise of higher density development. The studies have taken a balanced view of tall buildings and the approach has been a pragmatic one in that the Council will not directly encourage tall buildings any where in the Borough, but understands that the problem of development viability must be understood if houses are to be delivered within Brent.
However, above all there must be design standards that dictate consideration of context and most importantly the historic environment. Not all the Borough’s growth areas have a high quality historic environment that requires special protection, but as stated in the previous section, Wembley and South Kilburn have particular needs. The following section will outline the background to these two sensitive areas and explain the urban design studies and evidence base that has lead to the production of the Core Strategy policies.

3.2 Wembley Masterplan Area

Wembley has become a complex urban centre with an established late nineteenth century early twentieth century suburban centre cheek by jowl with a industrial growth area to the East, that is set to provide 10,000 homes and 10,000 jobs the next 20 - 25 years. Strangely, it is the later industrial area of Wembley Park that is the location of the higher quality historic environment; the industrial estate is on the site of the 1923 British Empire Exhibition. Although there are only 2 Listed Buildings within the Wembley Growth Area (Wembley Arena and Wembley Town Hall), there are other aspects of the area that give it a special character. The original Exhibition layout can still be traced within the existing landscape and is preserved in the urban grain of the new Masterplan. The topography of the area is also an important factor in the consideration of locations for tall buildings, with particular attention given to views from the surrounding residential suburbs, including those from Barn Hill Conservation Area.

Wembley has been thoroughly analysed over a number of years and provision has been made for the historic environment and its relationship to high density development and tall buildings in the following documents:

Wembley Masterplan 2009

Wembley Urban design Study 2007
These documents have thoroughly covered the assessment of the Wembley industrial areas and those directly adjacent to the National Stadium and are supported by numerous other studies by the Richard Rogers Partnership, The Council and the LDA. Views in and out of the area have been thoroughly analysed and are identified as important elements contributing to the character of Wembley and the Borough. They are recorded in chapter 3.0 of the Core Strategy. The historic environment within the area has been thoroughly considered and has already contributed to the sensitive reuse and adaptation of the Empire Pool now known as Wembley Arena. The rest of the major pavilions and buildings from the original exhibition have been lost during the development of the industrial area and only the listed buildings have survived. The Palace of Engineering was considered too large and inflexible to preserve and was in any case designed as a temporary exhibition hall.

3.3 Wembley Town Centre

There has also been thorough analysis of the wider Wembley Growth Area to identify suitable locations for tall buildings. In particular, attention has been given to the existing town centre, with a number of site briefs produced and an emerging development framework currently under production. These studies included:

Wembley High Road/Link Study
2009

Wembley Tall Buildings Strategy
2003
3.4 South Kilburn

South Kilburn is the Borough’s growth area with the richest historic environment; the area includes Victorian housing terraces, underground stations, public houses and places of worship. However, the area has benefited from some very close scrutiny in terms of character assessment and audit as part of an ongoing Masterplan process. The area is an awkward blend of high quality Victorian townscape and post war high rise interventions that has established some very poor townscape and led to an area desperate for regeneration and rehabilitation. The Masterplan 2003 looked at the historic environment and established the surviving historic fabric as the focus, the criterion for considered development that would provide sufficient homes for local residents at much lower storey heights. The Masterplan is now gaining momentum with a number of developments that have started to provide the de-cant potential to allow demolition of the 18 storey Bison blocks. The regeneration of South Kilburn builds upon many of the criteria set out in the English Heritage/CABE “Guidance on tall buildings”, in particular highlighting the ‘opportunities for the removal of past mistakes and their replacement by development of an appropriate quality’ (Section 2.6). This important historic area has been thoroughly considered and the historic environment is not only protected, but lauded as the defining character of a regenerated South Kilburn.

South Kilburn Masterplan
2005
South Kilburn Masterplan Public Realm
2004

South Kilburn Masterplan Sustainability
Environmental impacts
2004

South Kilburn Supplementary Planning Document
2007

South Kilburn Masterplan Site 18
Queens Park Station
3.5 Burnt Oak /Collindale

The A5 Corridor runs up along the Eastern boundary of the Borough it runs alongside large areas of industrial, retail and employment land that subject to the sequential test may offer an opportunity for more housing or more viable employment uses. The area is part of a broader cohesive neighbourhood that spans Borough boundaries and the Council at Brent has been working with the London Borough of Barnet to develop an Area Action Plan and is in the process of developing a rigorous and comprehensive Masterplan for the stretch from Colindale to Burnt Oak Town Centre. The Plan will of course, build upon the principle of tall buildings, establish the best location for them and the appropriate scales and massing for individual sites and groupings of sites. However, the area has only one listed building within the Masterplan area the Mecca Bingo hall on Edgware road.

Burnt Oak/Collindale

4.0 General Guidance

The Borough has basic supplementary planning guidance that addresses the problems of relative scale, massing and proximity. Respect for context is achieved through encouraging best practice in urban design and some numerical principles from BRE guidance. The Council’s SPG17 (soon to be re written and re adopted as SPD) is an important document for the Council in protecting established high quality context and is due for a complete review and overhaul. The document will be revised to understand and rationalise the pressures of providing new homes and at the same time enable protection of established urban and suburban landscapes. The height of buildings is a contentious issue at Brent; the majority of residents through their Councillors and the Planning Committee are very concerned about the implications of multi storey buildings. The review of SPG17 will be subject to comprehensive and rigorous consultation and scrutiny.

5.0 Summary

The London Borough of Brent is acutely aware of the implications of tall buildings on its historic and suburban landscapes. The Borough has been traditionally cautious of multi storey buildings and it is only really Wembley and South Kilburn that have buildings of any significant height. However, the pressure of housing delivery means that the Borough must take a realistic view of higher density development and expect developers to apply for taller buildings.
5.1 A sequential coordinated approach to assessment and control
In order to understand and control the impact of tall buildings on the historic and suburban environment the Council will rely upon the following principles:

5.1.1 Character assessment
Have a full audit of the historic environment of the Borough and understand the nature of these assets through rigorous, accessible archives and character assessment.

5.1.2 Professional Advice
Maintain a professional an experienced resource pool of advisors including historic buildings, architecture and urban design professionals:

Brent Council
Ensure Local authority advisors are appropriately experienced and qualified, at present the Council has architecture, urban design and conservation specialists.

Design Review Panel
The Council has an independent Design Review panel of experienced world renowned architects and designers to assess major applications for tall buildings.

5.1.3 Coordinated Policy
Ensure that policy frameworks are rationalised and coordinated to enable planning control of tall buildings proposals and development including:

3.1 Ensure Local Policy is intertwined with broader policy structures and does not contradict regional and National Policy Including: CP17, DP/UD17, DP/UD 2.

3.2 Apply coordinated regional guidance of the London Plan (4b.8) and CABE (Guidance on tall buildings) and integrate with the LDF.

3.3 Thread the principles of National policy including PPS2 PPS15 into the Core strategy and it application.

5.1.4 Supplementary Planning Guidance/Documents
Cascade the principles of planning policy down in detailed Supplementary Planning Guidance and Documents SPG05 and SPG17.
5.1.5 Identify Appropriate Locations
Establish recognised growth areas where tall buildings will provide a valuable regeneration resource and not impact on the historic environment and ensure their potential is maximised through identification within the LDF.

5.1.6 Identify inappropriate locations
Identify inappropriate locations for tall buildings and ensure that they are protected through coordinated local and wider policy.

5.1.7 Masterplans and Area Action Plans
Provide specific area planning guidance and Masterplans to identify specific sites within growth area that will be suitable for taller buildings and give specific high parameters for buildings such as South Kilburn and Wembley.

5.1.8 Consultation
The Council will, and is required to consult with regional advisors on tall buildings applications and will continue to encourage consultation and review of applications through the GLA, CABE and the RIBA. Brent residents in coordination with elected members have become concerned about the impact of tall buildings on the landscape of the Borough. They consider that ten storeys would be a tall building even within a Growth Area.

The Council is confident that it has the policy foundation and support mechanism to manage and control the development of tall buildings within the Borough. It is unfortunate that Brent does not have the richest of historic environments, however the Council is conscious that it must protect what does survive within the borough in a coordinated and expedient manner. To this end the framework set out in this report will ensure that tall buildings compliment the skyline of Brent and do not negatively impact on the setting and integrity of its historic assets.