

# Q. SQUARE

London Borough of Brent  
c/o Ms. Andrea Copsey  
Examination Office

Dear Ms. Copsey,

24<sup>th</sup> August 2020

## **London Borough of Brent: Examination of the Brent Local Plan London Hotel Group Representation**

We write to you on behalf of our client, London Hotel Group (LHG), to make further representations in respect of the London Borough of Brent (LBB) Draft Local Plan and its 'soundness' for the purposes of Examination in Public.

### **Background**

LHG most recently made representations (dated 5<sup>th</sup> December 2019) in respect of the Regulation 19 Stage. These representations focused on Draft Site Allocation BSWA10: Elm Road (attached as **Appendix A**). LHG have a significant land interest in the area of land which is the subject of this draft Site Allocation. This latest representation is attached as **Appendix B** for ease of reference. LHG also made representations as part of the Preferred Options Version of the Draft Local Plan in December 2018.

The Regulation 19 representation raised the following matters:

- Supportive of the growth strategy proposed by LBB, including within the Wembley Growth Area;
- Supportive of the principle of Draft Site Allocation BSWA10: Elm Road and its aspirations;
- The proposed residential capacity of the Draft Site Allocation could be exceeded;
- Greater scale and density could be achieved in excess of the 5-6 storeys which appears to be identified for the majority of the Draft Site Allocation, particularly taking into account the sustainable location of the site and if good quality design is achieved;
- The Draft Site Allocation should seek to deliver the 'maximum reasonable amount' of affordable housing;
- Any requirement for the delivery of on-site affordable workspace should not compromise the delivery of the scheme and the flexibility for an end user; and

- Supportive of the approach to lower levels of car parking in a sustainable location, such as this.

LBB's Publication Stage Consultation Responses were issued and the extract which comprises LBB's responses to the matters raised by LHG are contained within **Appendix C**. LBB concluded the following:

- In terms of the site capacity identified within the Draft Site Allocation of 400 homes, this is indicative capacity and a greater number of homes could be achieved, subject to good quality design;
- Whilst the Draft Site Allocation does refer to a general height of between five and six storeys, there may be an opportunity to promote taller buildings where sites are large enough to create their own character in accordance with Policy BD2;
- LBB is happy that its approach to affordable housing accords with London Plan Policy; and
- The financial implications of providing affordable workspace will be considered as part of the overall financial viability of the scheme.

### **Soundness of the Draft Local Plan**

We are aware that as part of the Examination in Public that the 'soundness' of the Local Plan will be assessed. To be 'sound' the Plan must be:

- Positively prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified: the most appropriate strategy when considered against the reasonable alternatives and based on proportionate evidence;
- Effective: deliverable over the plan period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy: able to achieve sustainable development in accordance with the NPPFs policies.

LHG are keen to reiterate that they are fully supportive of LBC's growth agenda and the general approach to Draft Site Allocation BSWA10.

The specific matter that LHG would like to raise in respect of Draft Site Allocation BSWA10 relates to the paragraph under 'Design Principles' which states that:

*"...Along the High Road, height should relate to adjacent heritage buildings. The rest of the site is suitable for tall buildings of a mid-rise height of 5-6 storey to mediate a satisfactory relationship of scale and massing already existing in the surroundings and take into account the topography..."*

We do not consider that the specific element of the 'Design Principles' which refers to the site being suitable for buildings of between five and six storeys as being either 'positively prepared', 'justified' or 'consistent with national policy' for the following reasons:

- LHG have previously provided a Townscape and Heritage Note (**Appendix D**) as part of LHG's Preferred Options consultation response which concluded that:

*"...We consider that there is potential for a taller building(s) on the subject site, having regard to the existing and emerging context to the south and east (including Chesterfield House) and that the suburban residential townscape to the north and west is separated from the Site by existing railway lines..."*

*"...We suggest that proposals for tall buildings at the Site within the Wembley Central sub area could be appropriate and should be scrutinised on a site by site basis through the planning application process and/or through more detailed site specific policy (e.g. Draft Site Allocation BSWA Wembley High Road) and/or supplementary planning guidance such as masterplans (e.g. as has been the case with the Wembley Link SPD (2011) and Wembley Masterplan (Adopted June 2009))..."*

We therefore consider that this justifies an alternative approach to building heights within the draft Site Allocation and the current approach is not fully justified;

- The Draft Local Plan Policies Map (2019) identifies the site as being within a Tall Buildings Zone. On this basis, we consider that an alternative approach to building heights is justified;
- LBB's Publication Stage Consultation Responses considered LHG's comments in respect of the design guidance on height within the Draft Site Allocation and concluded that:

*"...Similarly for scale and building heights, the allocation of the site for mid-rise buildings up to 5-6 storeys is based on the circumstances of the site and the council's Tall Building Strategy. This site has a multiplicity of ownerships and will be very complicated to deliver. The Local Plan in BD2 policy justification does identify that sites which the Council has not yet identified for tall buildings may come forward where the site is of sufficient size to create its own character. The Council will need to be confident that delivery of the scale identified by the respondent is possible to allow tall buildings clusters and stepping down, etc. to occur..."*

This response supports LHG's view that an alternative approach to the proposed building heights is justified. In addition, the circumstances or context of the site includes Chesterfield House, which is a completed part 21 / part 26 storey development, immediately opposite the site on the eastern side of Park Lane, and the modern development of 11 storeys on the opposite (southern) side of Elm Road, as the junction with Elm Road and Park Lane. In LHG's view this further justifies a more flexible and design-led approach to the height guidance within the draft Site Allocation. Indeed the Council's approach to building heights for the draft Site Allocation does not appear to be founded on a robust evidence base and therefore this further highlights whether the current approach is justified;

- Paragraphs 122 and 123 of the NPPF state that:

*"...Planning policies and decisions should support development that makes efficient use of land, taking into account:*

*a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*

- b) local market conditions and viability;
- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- e) the importance of securing well-designed, attractive and healthy places.

Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:

- a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;
- b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and
- c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)..."

Based on the NPPF and the above evidence, we consider that the current wording of the Design Principles in respect of height does not provide the opportunity to optimise the development potential of the site. This considers the sustainable location of the site noting the very good public transport infrastructure, the site context (including the taller buildings at Chesterfield House and on the junction of Elm Road and Park Lane) and the increased housing levels that LBB needs to achieve. For these reasons, we consider that the Design Principles in respect of height are not currently consistent with National Policy or Positively Prepared.

On the basis of the above, LHG instead propose that the Design Principles are amended to be less prescriptive in terms of height. Instead this section could be amended to say that building heights should "...reflect the character of the area and also optimise the development potential of the site through taller buildings, subject to good quality design..". This approach provides greater flexibility in the future to meet the relevant planning policy objectives, whilst still allowing for the assessment of the quality of design.

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Appendix A

Draft Site Allocation

<b>INDICATIVE CAPACITY</b>	250
<b>TIMEFRAME FOR DELIVERY</b>	0-5 Years    5-10 Years    10+ Years
<b>ADDRESS</b>	Wembley High Road, Wembley, HA9 7DU
<b>AREA</b>	0.84ha
<b>DESCRIPTION OF EXISTING SITE</b>	The site sits on the south side of Wembley High Road and a cleared site that was formerly Ark Elvin Academy (former Copland School). It is adjacent to the former Brent House site, which is currently under construction to provide 248 new homes with flexible commercial space at ground floor. To the south of the site sits the newly built Ark Elvin Academy, while to the east and west Wembley Park and Wembley town centres are a short walk away.
<b>OWNERSHIP</b>	Public, owned by Brent Council
<b>PLANNING HISTORY</b>	Previously allocated for development in the Wembley Area Action Plan
<b>PTAL RATING</b>	6a
<b>PLANNING CONSIDERATIONS</b>	<p>The site is within the defined Wembley town centre boundary, and was previously identified as an opportunity site that is suitable for redevelopment and sensitive to tall buildings within the Wembley Area Action Plan (WAAP).</p> <p>An active frontage must be created to the northern edge of the site along the High Road.</p> <p>The high PTAL of 6a provides the opportunity for higher density development. The site is located within an Air Quality Management Area. As such, development at this site should be air quality positive as it is within the Growth Area</p> <p>The site contains a Site of Archaeological Importance, the former Wembley House. Development should accord with policy BHC1 Brent's Heritage Assets and provide a detailed analysis and justification of the potential impact of the development on the heritage asset.</p> <p>Vehicular access to the site will be from Cecil Avenue.</p> <p>A London Plane subject to Tree Preservation Order exists on the north eastern side of the site. Developers should have regard of existing verges and tree stock on site.</p> <p>The site is adjacent to a secondary school, so will need to ensure that its operation as an effective place for education is not compromised.</p> <p>The inclusion of community use floorspace that would otherwise be provided through the redevelopment of the former Wembley Youth Centre and Dennis Jackson Centre, London Road, Wembley, HA9 7EU would create a more useable community space and increase housing capacity on that site.</p> <p>A very small portion of the site is categorised as Flood zone 3a and susceptible to surface water. Any development on site should consider mitigation of surface water flood.</p> <p>Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.</p>
<b>RISKS</b>	No significant risks identified
<b>DESIGN PRINCIPLES</b>	<p>The site is suitable for tall buildings, but of a mid-range height that mediates between the development of the former Brent House (10 storeys) and the hotel across Cecil Avenue (7-8 storeys). Taking account of the topography and scale of development along Cecil Avenue towards the rear of the site, development should step down southwards.</p> <p>The ground floor on the High Road frontage should contain a continuous active frontage of main town centre uses to continue the road line between the former Brent House development and the retail units to the west. Development along Cecil Avenue must positively address the street and entrance to the Ark Elvin school whilst to the east should face outwards along the school access route from the High Road.</p> <p>Safe access to the Ark Elvin Academy along Cecil Avenue.</p> <p>Sufficient space should be provided along the High Road to allow street or on site tree planting to enhance the public realm on this part of the street.</p> <p>Servicing access should be off Cecil Avenue.</p>
<b>INFRASTRUCTURE REQUIREMENTS</b>	No specific infrastructure requirements identified.
<b>JUSTIFICATION</b>	The site is located in an area with excellent public transport accessibility levels and will replace the former school buildings with a well-designed, contemporary scheme, contributing towards Brent's housing need. There is an opportunity for development here to create a greater link between Wembley Central and the new development around the stadium, with an improved active frontage along the High Road.

## BSWA10: ELM ROAD

<b>SITE PLAN</b>			
	<b>EXISTING USE</b>	Commercial use, hotel, parking, vehicle repair garage, residential, mixed-use residential, employment, church	
<b>ALLOCATED USE</b>	Mixed-use town centre use within town centre boundary. Mixed used residential led development, Hotel and supporting community facilities		
<b>INDICATIVE CAPACITY</b>	400		
<b>TIMEFRAME FOR DELIVERY</b>	0-5 Years	5-10 Years	10+ Years
	200	200	

<b>ADDRESS AREA</b>	Elm Road, HA9 7JA 2.98 ha
<b>DESCRIPTION OF EXISTING SITE</b>	Part of the site is within the Wembley town centre boundary comprising of large format retail unit of Primark and Pound store. The site runs along the side street St. John's Road with mixed and small retail parade, a large car park and car repair garage. Towards the east is the Spiritualist Church and parallel to the High Road is Elm Road with bus stops and a three storey Euro Hotel. North of the site is bounded by Grade I Chiltern Line / Wildlife corridor, Wembley Central station and bus stops are less than 200m from the site.
<b>OWNERSHIP</b>	Private/Public
<b>PLANNING HISTORY</b>	Permission granted to 1,7, 9, 11 and 11A Elm Road in 2018 for demolition of existing hotel buildings and erection of 5 storey 226 bed aparthotel plus 5-storey basement (18/4063).
<b>PTAL RATING</b>	PTAL 4-5a currently increasing to 5/6a by 2031 The site sits within the wider Wembley Growth Area and Wembley regeneration. Part of the site on Wembley High Road falls within the town centre boundary with primary and secondary shopping frontage. The active frontage will have to be maintained. As the site borders the Wembley High Road the developer should carry out a viability and traffic assessment for provision of mixed use suitable for secondary frontage. The High Road frontage should contain main town centre uses. The developer should redevelop the site to demolish the existing Euro Hotel. The site contains a church and any future development must take care to provide accessible community facilities. As Brent is a provide capacity borough in the London Plan, the loss of the garage means that employment use should be re-provided through a net increase in employment floor space. The site is bordered in the west and north by SINCRAD Chiltern railway line linking a number of wildlife sites. Development should adhere to the London Plan policies and Brent's Policy BGI that sets a local requirement for the protection and enhancement of wildlife corridor. There are a number of trees across the site which should be retained where possible. The site is within an air quality management area so development will need to be air quality positive given its within the Growth Area. PTAL is high so parking provision should be minimal with consideration given to the signed cycle route. St. John's Road should remain a high quality road to connect traffic. The development needs to deal adequately with the noise impacts of the railway. Green infrastructure should be provided to enhance the site and should come forward as part of a comprehensive masterplan and individual schemes which would compromise the most efficient land use of the site will be refused. Parts of the site is flood-prone and susceptible to surface water flooding, predominantly adjacent to the railway tracks. A site specific flood risk assessment will be required ensuring highest feasible environmental standards.
<b>PLANNING CONSIDERATIONS</b>	Impact on infrastructure and wildlife corridor, business relocation, edge of town centre, multiple land owners.
<b>RISKS</b>	Development coming forward should provide active frontage along all publicly visible areas. Along the High Road, height should relate to adjacent heritage buildings. The rest of the site is suitable for tall buildings of a mid-rise height of 5-6 storey to mediate a satisfactory relationship of scale and massing already existing in the surroundings and take into account the topography. The total development should positively address the street and should be designed in line with principles set out in Planning application 18/4063. The developer should benefit from the sites High PTAL. Proposals should seek to retain existing road network with frontage along the site. Appropriate setback will be encouraged to balance the protection and enhancement of the wildlife corridor north of the site. The existing tree stock of mature trees should be retained and positively addressed by any proposed building. Accessible community facilities should replace the church, high quality route on St. John's Road with pedestrian and cycle facilities. Consideration of sustainable infrastructure.
<b>INFRASTRUCTURE REQUIREMENTS</b>	
<b>JUSTIFICATION</b>	This site is included in the Wembley Growth Area. It is generally comprised of low density commercial use which has not maximised the development potential of the area. This allocation will allow the site to contribute towards Brent's housing numbers, community facilities, retail and employment floor space. New developments have come forward on neighbouring sites. The site's proximity to Wembley Central Station, bus routes and High Road make it a good location for residential and employment use.

**FIGURE 31 OTHER SITE ALLOCATIONS**

REF.	ADDRESS	SIZE (HA)	EXISTING USE	ALLOCATED USE	INDICATIVE HOMES	COMMENTS
BSWSA 11	Wembley Cutting North, Mosyn Road	0.2	Railway land	Residential	15	Part of Former WAAP WA, so principle of development considered acceptable. Suburban scale development.
BSWSA 12	Keelers Service Centre, Harrow Road, Wembley, HA0 2LL	0.07	MOT Test Centre	Residential / commercial employment (Business Use Class)	24	Ground floor employment use maximised, with upper storeys residential
BSWSA 13	Wembley Police & Fire Stations, Harrow Road and Wembley Community Hospital/Chaplin Road Health Centre	3.9	Police, fire and health facilities	Existing police, fire and health opportunities for other community uses considered and residential on any surplus land	Unknown at this stage	Potential One Public Estate Site Reconfiguration. Site inefficient due to piecemeal development / old building stock. Existing uses to be retained/ improved buildings potentially realising residential site.
BSWSA 14	Sudbury Town Station car park	0.22	Car park	Residential	30	Development should protect and improve Sudbury Station. Suitable levels of replacement car parking for disabled station users must be retained.
BSWSA 15	Employment Land on Heather Park Drive	0.5	Business and office space	Residential / employment use	28	Mixed use residential with maximum replacement employment floorspace.
BSWSA 16	Carphone Warehouse 416 Ealing Road	0.5	Retail warehouse	Mixed use retail/commercial/ community and residential	80	Loss of majority of retail acceptable. Some replacement to serve local area sought, active ground floor frontages particularly along Ealing Road.
BSWSA 17	Former Wembley Youth Centre/ Dennis Jackson Centre London Road HA9 7EU	0.96	Vacant Youth & Community Centre	Residential with community use	150	Re-provision of approx. 350 sqm of community required

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Appendix B

LHG Representation  
Regulation 19



# Q. SQUARE

Planning Policy Team  
Brent Civic Centre  
Engineers Way  
Wembley  
HA9 0JF

By email:  
planningstrategy@brent.gov.uk

05 December 2019

Dear Sir / Madam

**Consultation Response on behalf of London Hotel Group  
Brent Draft Local Plan Regulation 19 Consultation – 24 October to 5 December 2019**

Thank you for the opportunity to engage with the preparation of Brent's new Local Plan (Regulation 19 Consultation).

We write on behalf of London Hotel Group ('LHG') setting out both our support for the draft Local Plan Regulation 19 publication ('draft Local Plan') and our suggested amendments to it.

LHG operate several hotels across London, including hotels in London Borough of Brent. They are experienced in delivering hotel development in London and have an interest in the Council's aspirations for this part of Brent.

LHG are the owner of several properties along Elm Road and St. Johns Road. This includes the properties on 1 to 11 Elm Road which achieved permission (reference 18/1592) for:

*'Demolition of existing hotel buildings and erection of a part 3, part 4 and part 5 storey 226 bed aparthotel plus basement accommodation comprising guestrooms and ancillary facilities within a 5-storey basement (situated below the part-basement lower ground floor), together with soft and hard landscaping, servicing, cycle storage and refuse and recycling facilities.'*

In the context of LHG's current investment in Brent through the Elm Road hotel site, and in relation to any other sites which LHG may seek to bring forward in Brent in the future, LHG supports the aspiration of the draft new Local Plan to provide a planning framework and vision for change and good growth concentrated in accessible areas.

We are of the view that development growth is vital in order to ensure that Brent continues to fulfil the opportunity that it creates for London. The ambition of the new Local Plan should therefore focus on providing a framework that responds to community needs but that also maximises and facilitates the delivery of new development. LHG are keen to ensure that the new Local Plan enables these two objectives to be achieved without prioritising one over the other.

### **Representations to Brent New Local Plan Consultation**

We set out below an executive summary highlighting LHG's key suggested amendments to the draft Local Plan in relation to affordable housing, design (including height), town centre and employment policy, residential, parking and Site Allocation BSWA10 Elm Road. Further detail is set out in the body of the representation.

### **Executive Summary**

#### **Site Allocation BSWA10 Elm Road**

- LHG supports the aspirations of the Elm Road Site Allocation. However, it is considered that the capacity for residential dwellings (currently identified as circa 400 homes) can be exceeded and that circa 1,300 dwellings can be delivered in line with the Council's aspirations for meeting housing demand in Wembley Growth Area.
- It is also considered that the Site Allocation can more closely align with draft New London Plan policy which advocates for design-led high-density development. Thus, we suggest that subject to a high quality design, greater than 5-6 storeys could be achieved at Elm Road in this Tall Buildings Area, to maximise the potential of this strategically important site located partially in Wembley Town Centre and with high public transport accessibility (PTAL of 4-6a, due to increase to 5-6a in 2031). The development potential of this area should not be restricted by a maximum height at this stage but considered at planning application stage, taking into account planning benefits and design quality.

#### **Housing Strategy**

- LHG note the aspiration of Brent Council to provide minimum 35% affordable housing, and we suggest that in line with other adopted and emerging regional and local policy, that the amount of affordable housing should be the 'maximum reasonable' in the context of viability and other considerations.
- We encourage site specific discussions with the Council to enable the delivery of the most appropriate mix for Elm Road.

#### **Employment and Centres**

- LHG supports growth in Wembley Town Centre and opportunities for employment. However, a requirement for onsite affordable workspace should not compromise flexibility of an end user and ability for development to feasibly come forward. Guidance on how financial contribution in lieu of onsite provision is to be calculated should be provided.

## **Parking**

- LHG acknowledges the policy direction towards encouraging sustainable modes of transport. It is considered that in accessible locations, car free development is a good starting point for development.

## **Part 1: Introduction**

We are supportive of the policy messages relating to strategic growth of Brent, set out within the six Good Growth Policies and to be delivered through specific growth opportunities provided by the Growth Areas including Wembley Growth Area which is highlighted in Policy BCGA1. LHG recognise that Brent has an increasingly important role amongst the other London boroughs to deliver London's growth in the most optimal and sustainable way.

We welcome the recognition that there is opportunity for substantial growth within the Growth Areas. It is noted that Brent has a projected baseline scope for 29,150 new homes between 2019/20 to 2028/29 which according to the draft Local Plan is equivalent to one dwelling being built for every four homes that currently exist. Furthermore, it is anticipated that jobs will increase by 0.39% per year. These targets provide a clear foundation on which to target growth, facilitated by sustainable mixed-use development.

## **Part 2: Good Growth**

We welcome the focus of the Wembley Growth Area Policy BCGA1 which seeks to promote Wembley as the place which will drive the economic regeneration of Brent. However, it remains clear that the levels of population growth anticipated by the Mayor are such that the requirement for new homes will remain significant. It is clear therefore that Wembley, which is designated as an Opportunity Area by the GLA and has a minimum requirement for 11,500 new homes, should seek to support this.

Policy BCGA1 should ensure that supporting growth through delivery of new homes in Wembley is included within the policy wording alongside a focus on investment in economic regeneration to meet the regeneration ambitions in this part of Wembley.

We note that the place vision, outlined in Policy B7 'South West' supports continuing residential-led mixed use development within Wembley. This policy supports tall buildings in the Wembley Growth Areas. However, the policy (part b) assumes a height of 15-18 metres (5 or 6 storeys) to be appropriate. The draft Local Plan seeks to focus most of the new housing for the borough in the South West in Wembley. Therefore, to achieve this target it is likely that higher density development to optimise the potential of sites in line with this ambition and wider regional and local policy frameworks will be required.

We therefore suggest that there is scope for flexibility relating to height and density on a site specific basis, and this should also be reflected in the policy wording and the wording within Site Allocation BSWA10 Elm Road ('Elm Road') which holds a strategically important location adjacent to Wembley Town Centre.

Site Allocation BSWA10 'Elm Road'

Elm Road (Figure 1) currently states an indicative capacity of 400 dwellings and height of mid-rise building between 5-6 storeys for buildings beyond the High Road.

**Figure 1: Draft Site Allocation BSWA10**



We consider that Elm Road could achieve a greater scale and density, subject to townscape assessment and high-quality design, beyond that indicated within the draft Site Allocation. This in turn could offer greater planning benefits and contribution to local community and transport infrastructure.

#### *Housing capacity*

We consider that the Site can offer substantial benefits and a 400 dwelling capacity may not maximise the development potential of the Site in accordance with draft Policy Good Growth 'Making The Best Use of Land' which seeks to prioritise development in 'new and more efficiently and intensively developed Growth Areas' (including Wembley).

We consider that circa 1,300 dwellings could be achieved within Elm Road. We have calculated this density based upon the London Plan's density matrix and our assumptions are set out as follows. This would obviously be subject to further discussions with the local authority regarding a site-specific scheme design.

The London Plan density matrix states that accessible central locations (defined as 'areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an International, Metropolitan or Major town centre') and a PTAL of 4-6a (increasing to 5/6a by 2031) means that an upper density range of 1100 hr/ha can be achieved. Elm Road has an area of 2.98 ha therefore using this indicator, we consider that 3,278 habitable rooms could be achieved. If 2.5 habitable rooms per dwellings is assumed, then this is equal to 1,311 dwellings.

#### *Scale*

Where development is of a high quality, high densities and greater scale should not be resisted. Indeed, as a prominent and well-connected location in London, Wembley Town Centre is

arguably one of the most appropriate locations for such development to occur, particularly given Elm Road's location within a Tall Building Area and because draft Local Plan Policy BD2 'Tall Buildings in Brent' suggests opportunity for higher buildings at strategic points in town centres.

Elm Road is strategically located partially in Wembley Town Centre and Wembley Central Train Station and a short walking distance (circa 10 minutes walking) from Wembley Stadium Train Station. In terms of the local economy, Wembley Town Centre is also the most prominent location in terms of employment growth. We therefore consider that the dwelling growth scenario, as is currently envisaged by the baseline assumption for Elm Road in the draft Site Allocation can be exceeded. The Site Allocation for Elm Road in the draft Local Plan should make this clear and set a new target of circa 1,311 homes to accord with the overarching vision of the draft Local Plan.

### *Trees*

Lastly, we promote high quality visual amenity. We note that the Site Allocation for Elm Road requires retention of the existing tree stock of mature trees should be retained. However, it is considered that flexibility should be allowed in terms of retention of trees where this may limit optimisation of the development of Elm Road and delivery of other planning benefits. This flexibility is identified in draft Local Plan policy BG12 'Trees and Woodlands' which recognises that where retention of trees is not possible on-site mitigation through tree planting or financial contribution may be acceptable. It is considered that this should also apply to Elm Road and be made clear within the draft Site Allocation wording.

## **Part 3: Opportunities for Good Growth**

### Housing Strategy

We support the delivery of high-quality housing for the local community. We also note the identification of a minimum target for 35% of these homes to be affordable (at paragraph 6.2.46), in keeping with the aspirations of the Mayor of London. However, to ensure consistency with national policy, the draft Local Plan Policy BH5 'Affordable Housing' should make clear that the percentage arriving from development proposals and financial contributions for developments of between 5-9 dwellings will be the 'maximum reasonable' in the context of viability and other considerations.

Delivery of new homes should not be delayed by unrealistic or inappropriate demands for affordable housing in the context of individual site viability.

It is also noted that the Council will seek maximum provision of social rented units (70%), although the Council recognises the difficulty in delivering these units. Thus, it is considered that the 70/30 split of social rented to shared ownership should be subject to financial viability assessment.

We acknowledge that in terms of housing mixes, the draft Local Plan notes that family housing (25% total provision is sought) may be more appropriate in certain locations or for certain characteristics of a development. We encourage site specific discussions with the Council to enable the delivery of the most appropriate mix for Elm Road.

### Centres and Employment

We acknowledge the important urban spatial role Wembley Town centre must play as the largest retail centre in the borough. Redevelopment of the Elm Road site for mixed use development can positively and sustainably contribute to growth of the Town Centre Status and aspirations of the Council for a step change towards 'International' town centre status.

We support economic growth in the borough. However, we also consider that within Policy BE1 'Economic Growth and Employment Opportunities for All' the requirement for 10% total floorspace in major development exceeding 3,000 sqm in the Wembley Growth Area should not compromise the ability for development to come forward in terms of financial viability and flexibility for end users.

We note that in paragraph 6.4.13 that the Council will consider financial contributions in certain circumstances, for instance where a single large unit may be proposed, and we support this approach to encourage flexibility for commercial end users. Guidance on how this financial contribution will be calculated would be welcome.

### **Part 4: Supporting Growth with Infrastructure**

#### Transport

We acknowledge Appendix 4 of the draft Local Plan which adheres with draft New London Plan policy T6.1 residential car parking standards. Given the high accessibility of the site at Elm Road, we consider that car free parking as a starting point for development could be suitable.

### **Part 5: Urban Design**

#### High Quality Design

As already stated in this letter, we consider high quality development to be a key part of delivering optimal development. We are supportive of draft Policy BD1 'Leading the Way in Good Urban Design'. However, we consider that high quality design which is visually interesting and enhances local character can be conducive with taller buildings.

#### Tall Buildings

Whilst we acknowledge draft Policy BD2 'Tall Buildings in Brent' we consider that there is an opportunity, particularly in the Growth Areas of Brent, to increase density on sites such as Elm Road to deliver planning benefits including affordable housing, affordable workspace, and public realm whilst enhancing the local character and nearby heritage assets through carefully designed architecture.

Indeed, the draft New London Plan advocates for design led high density development which optimises land, including where sites are accessible, are subject to infrastructure improvements, and are in a suitable context for intensification. With high public transport accessibility (4-6a increasing to 5-6a in 2031) and a strategic location at the heart of Wembley partially located in the Town Centre, it is considered that draft Policy BD2 should not limit sites such as Elm Road in meeting their development potential to meet Local Plan objectives.

### **Next Steps**

We trust these representations are clear and we would be pleased to clarify or provide further information on any element as appropriate. We would likewise welcome a broader dialogue

with officers to ensure that the potential for Brent and Site Allocation BSWA10 Elm Road is captured in the new Local Plan.

We would be grateful for confirmation of receipt of these representations and look forward to some suggested dates to meet in person in order to build upon the content contained within them.

Please do not hesitate to contact us on the details at the head of this letter should you require any further

# Q. SQUARE

## Appendix C

Public Consultation  
Stage LBB Responses



# Appendix 3 BRENT LOCAL PLAN PUBLICATION STAGE CONSULTATION RESPONSES

February 2020

**SUMMARY OF COMMENTS RECEIVED,  
RESPONSES AND PROPOSED CHANGES TO  
THE DRAFT LOCAL PLAN**



Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.7 South West	BSWSA9	Thames water	Wastewater network unable to support capacity. Local upgrades required to existing drainage ahead of development. Developer to liaise with Thames Water for detailed drainage strategy.	The Plan takes into account Thames Water comments from previous consultation. For consistency with other policies this shall be moved to infrastructure requirements.	Planning considerations amend: <u>“Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</u> Infrastructure requirements amend: <u>“Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements.”</u>
5.7 South West	BSWSA10	London Hotel Group	Policy supported. <ul style="list-style-type: none"> <li>Capacity: It is considered that the 400 homes capacity for residential dwellings can be exceeded and that circa 1,300 dwellings can be delivered in line with the Council’s aspirations for meeting housing demand in Wembley Growth Area.</li> </ul>	Support for the aspirations of the allocation is noted.  <u>Site Capacity</u> The site capacity stated in the Local Plan is indicative only, based on the circumstances of the site and Brent's Tall Building Strategy. The density matrix in the current London Plan has been removed from the new London Plan and does not take into account site circumstances, or the need to re-provide employment space. A well-designed scheme may be able to provide a higher density than indicated but must adhere to the design principles outlined in the site allocation and other relevant policies in the Local Plan.  <u>Trees</u> With regards to trees, it is considered that the policy retains enough flexibility in outlining that trees on the site should be retained where possible, as the council's preference is for the trees on site to be retained. Any future applications resulting against the loss of trees would be assessed against policy BG12.	No Change.
5.7 South West	BSWSA10	London Hotel Group	<ul style="list-style-type: none"> <li>Building height: In line draft New London Plan policy for designed high-density development, we suggest greater than 5-6 storeys due to its location partially in Wembley Town Centre and with high public transport accessibility (PTAL of 4-6a, due to increase to 5-6a in 2031). The development potential of this area should not be restricted by a maximum height at this stage but considered at planning application stage, taking into account planning benefits and design quality.</li> </ul>	Scale / Building Heights Similarly for scale and building heights, the allocation of the site for mid-rise buildings up to 5-6 storeys is based on the circumstances of the site and the council's Tall Building Strategy. This site has a multiplicity of ownerships and will be very complicated to deliver. The Local Plan in BD2 policy justification does identify that sites which the Council has not yet identified for tall buildings may come forward where the site is of sufficient size to create its own character. The Council will need	No change.

Chapter	Page/ Para/ Policy/ Figure	Name/ Organisation	Summary	Officer Response	Proposed Change
5.7 South West	BSWSA10	London Hotel Group	<ul style="list-style-type: none"> <li>Housing Strategy: LHG note the aspiration of Brent Council to provide minimum 35% affordable housing, and it is suggested that the amount of affordable housing should be the 'maximum reasonable' in the context of viability and other considerations. Site specific discussions with the Council to enable the delivery of the most appropriate mix for Elm Road.</li> <li>Employment and Centres: LHG supports growth in Wembley Town Centre and opportunities for employment. However, a requirement for onsite affordable workspace should not compromise flexibility of an end user and ability for development to feasibly come forward. Guidance on how financial contribution in lieu of onsite provision is to be calculated should be provided.</li> </ul>	to be confident that delivery of the scale identified by the respondent is possible to allow tall buildings clusters and stepping down, etc. to occur. Housing Strategy The borough's approach is consistent with that in the London Plan. If the applicant does not follow the fast track route, then viability will be considered through the process identified in the London Plan/Housing SPG and the site will be subject to on-going reviews throughout its development.	No change.
5.7 South West	BSWSA10	London Hotel Group	<ul style="list-style-type: none"> <li>Parking: LHG acknowledges the policy direction towards encouraging sustainable modes of transport. It is considered that in accessible locations, car free development is a good starting point for development.</li> </ul>	Employment and centres: Where the affordable workspace requirement is making a site unviable it is likely that the site will be subject to viability testing as ultimately it is assumed that a lower proportion of affordable housing will be offered. At this stage the Council will consider the implications of all its policy requirements and prioritise those which it feels are worth pursuing, considering the impacts of the scheme in the round. The Council will produce guidance on how financial contributions will be calculated in a future Planning Obligations SPD.	No change.
5.7 South West	BSWSA10	London Hotel Group	<ul style="list-style-type: none"> <li>Wastewater network unable to support capacity. Local upgrades required to existing drainage ahead of development. Developer to liaise with Thames Water for detailed drainage strategy.</li> </ul>	Noted.	No change.
5.7 South West	BSWSA10	Thames water	STRA Neighbourhood Forum objects to the site allocation. The planning application for demolition of Keeler's Garage and development of a 5-7 residential block has been called-in by STRA Neighbourhood Forum currently awaiting the Secretary of State's decision. The allocation is contrary to the retention of Industrial space and the proposed Policy BP7 SOUTH WEST e) .....ensures no net loss of industrial floorspace .	Noted. Add reference to waste water matters under infrastructure requirements.	Infrastructure requirements amend: "Thames Water has indicated the scale of development is likely to require upgrades to the wastewater network. Thames Water will need to be engaged at the earliest opportunity to agree a housing and infrastructure phasing plan to ensure essential infrastructure is delivered prior to the development creating identified additional capacity requirements."
5.7 South West	BSWSA12	Sudbury Town Residents Association		Vale Farm: It is not clear what the concerns of STRA are. The Local Plan does not need to repeat the neighbourhood plan's contents verbatim. The draft Local Plan recognises the opportunities for improvement and enhancement of Vale Farm Sports Centre (Policy BP7 (n)). The Council also supports STRA's ambition for improvements and recognises in the Local Plan that it will explore all options of how this can be achieved within the financial parameters available to it (5.7.25). The open space at Vale Farm is identified as a Local Green Space. This designation is equivalent to Green Belt in national policy in terms of its level of protection (5.7.26). There is nothing in the Brent Local Plan that is inconsistent with the neighbourhood plan or which seeks to usurp its contents.	No Change.

# Q. SQUARE

Appendix D

Heritage and  
Townscape Note

# BRIEFING NOTE

**Site or property:**

Land bound by St. John's Road, Elm Road and Park Lane, Wembley

**Date:**

Monday, 25 March 2019

**Job number:**

PD12387

**Subject:**

Heritage and Townscape Review

**Client:**

London Hotel Group (LHG)

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## Introduction

Montagu Evans LLP have been instructed by LHG to provide heritage, townscape and visual consultancy services and produce this advice note in relation to emerging proposals for the redevelopment of land bound by St. John's Road, Elm Road and Park Lane, Wembley (the 'Site').

This statement comprises a preliminary appraisal of the emerging proposals for the Site and how heritage, townscape and visual receptors have been considered. Having regard to this we then provide a review of the emerging local planning policy context relevant to the Site.

The note and our initial advice has been informed by non-verified visualisations of the emerging proposals prepared by Squire and Partners. The visualisations have been a tool to inform an understanding of the potential impact of the emerging proposals on heritage, townscape and visual receptors.

## Site

The Site relates to land bound by St. John's Road, Elm Road and Park Lane, which is located within the London Borough of Brent. It is currently occupied by a hotel, the Wembley Spiritualist church and Edwardian and inter-war residential terrace properties (many of which are subdivided into flats). An adjacent parcel of land to the west of the Site, which comprises a public car park and residential properties to the east, is also considered having regard to its potential inclusion as part of a site wide allocation that could deliver significant growth and enable a holistic approach to establishing planning uses and design parameters.

The Site lies within the Wembley Growth Area / Opportunity Area and benefits from excellent public transport accessibility levels (PTAL 4-6a) and proximity to local amenities.

The current overall density of the Site is low relative the rest of the Wembley Growth Area / Opportunity Area and at odds with the Site's central and accessible location. The building height on Elm Road varies considerably, ranging from two to eleven storeys with development to the immediate east increasing up to 26 storeys.

The principle of redevelopment and increase in density and height has been accepted on part of the Site, with proposals for the demolition of five terrace house buildings comprising the current Euro Hotel Wembley and replacement with a building of up to 5 storeys approved in 2018 (application refs. 17/3188 and 18/1592).



# BRIEFING NOTE

To the north and west of the Site, beyond the railway lines, the townscape reflects that of the 1920s and 1930s 'metroland' development that accompanied the growth of rail and underground services. This generally consists of a lower density residential suburban townscape character, with a greater segregation of land uses; planned more around movement by car with more generous incidental open space, tree planting and parks and open spaces (e.g. King Edward VII Park).

To the south of the Site is the Wembley High Road and Wembley Central Station. Wembley High Road is a busy vehicular and pedestrian route, with a predominance of retail uses at street level, with some commercial and residential uses at the upper levels. Wembley Central Station has been a focus for recent development and includes the Wembley Central development, which ranges from two to thirteen storeys high and includes a large station forecourt.

To the east of the Site is the emerging townscape of the Wembley Link, which includes the Chesterfield House redevelopment of 21 and 26 storey buildings (under construction) (application ref. 15/4550) and the second phase of 17 and 19 storey residential blocks recently approved at the Council's Planning Committee (application ref. 18/3111). Further to the east the area is predominantly subject to the Quintain Masterplan that is informed by the Wembley Area Action Plan. The recent development and uses that have been introduced as a result of the redevelopment of the National Stadium has created a significant amount of activity and the character area is a vibrant new part of London accommodating significant growth.

## Legislation and Planning Policy

The planning policy context for the Site is set out in the accompanying planning statement provided by GVA, but an overview of the national and local guidance and other material considerations relative to the site are outlined below.

### Planning (Listed Buildings and Conservation Areas Act) 1990

Legislation relating to the protection of the historic environment is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990. This requires local planning authorities to have special regard to the desirability of preserving the special interest of listed buildings, conservation areas and their settings.

### Development Plan

The following documents form the statutory development plan for the Site, with policy considerations to heritage and design also identified:

Development Plan Policy	Key Provisions
London Plan (2016)	Policy 2.13 (Opportunity Areas and Intensification Areas) Policies 7.4 (Local Character) and 7.6 (Architecture) Policy 7.7 (Location and Design of Tall and Large Buildings) Policy 7.8 (Heritage Assets and Archaeology)
Brent's Core Strategy (adopted July 2010)	Policy CP1 Spatial Development Strategy Policy CP2 Population and Housing Growth Policy CP5 Placemaking Policy CP6 Design and Density in Place Shaping Policy CP7 Wembley Growth Area Policy CP17 Protecting and Enhancing the Local Character of Brent

# BRIEFING NOTE

Brent Development Management Policies Document	Policy DMP 1 Development Management General Policy Policy DMP7 Brent's Heritage Assets
Site Specific Allocations (SSA) Adopted 2011	Policy CP7 Wembley Growth Area
Wembley Area Action Plan (AAP) (adopted January 2015)	The WAAP sets out the strategy for growth and regeneration in Wembley for the next 15 years. Policy WEM1 Urban Form Policy WEM3 Public Realm Policy WEM5 Tall Buildings states that tall buildings will be acceptable in a limited number of locations within the Area Action Plan area, where they can demonstrate the highest architectural quality. Policy WEM6 Protection of Stadium Views Policy WEM8 Securing Design Quality
<b>Material Considerations</b>	
National Planning Policy Framework (NPPF) (2019)	Chapter 11 – Making effective use of land Chapter 12 – Achieving well designed places Chapter 16 – Conserving and enhancing the historic environment
New Draft London Plan showing Minor Suggested Changes (August 2018)	Table 2.1 – Wembley Opportunity Area targets: 14,000 new homes and 13,500 new jobs
Brent Local Plan Preferred Options (consultation draft published in November 2018 and is expected to be adopted in 2020)	Draft Policy BD1 which identifies the Wembley Growth Area as appropriate for tall buildings.
Draft Brent Tall Building Strategy (November 2018)	
Sustainable design, construction and pollution control (SPG 19) (Adopted November 2003)	
Wembley High Street Conservation Area Appraisal (2003)	
Brent Design Guide SPD1 (November 2018)	
Historic England Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017)	
Tall Buildings: Historic England Advice Note 4 (2015)	
Wembley Link SPD (Adopted July 2011)	
Wembley Masterplan (Adopted June 2009)	

# BRIEFING NOTE

## Heritage Considerations

There are no heritage assets within the Site boundary. There are some designated heritage assets located within the vicinity of the Site (See Appendix: Heritage Asset Plan), but the majority of these assets are located a significant distance from the Site and generally screened by interposing development and/or the local topography.

The salient considerations for heritage assets located in closer proximity to the Site and requiring more detailed assessment are discussed below:

- The potential effect of the proposals on the character and appearance of the Wembley High Street Conservation Area:
  - The Wembley High Street Conservation Area is located to the north of the Site. It is centred on the Green Man Pub and Hotel and occupies a relative high point in the local landscape. However, views out from the conservation area are orientated away from the Site and it is considered unlikely that proposals at the Site would alter the existing setting or views out of the conservation area.
- The potential effect of the proposals on the setting of the Church of St. John (Grade II):
  - The church is located on the High Road to the west of the Site. The existing setting of the church includes terraced residential properties in the immediate vicinity with the taller buildings at Wembley Central a feature of the wider townscape to the east. Having regard to the existing context, and due to the separation distance and presence of interposing development and trees, it is considered that emerging development proposals at the Site are unlikely to significantly alter the existing setting of the listed church. Detailed assessment of relevant proposals at the Site, informed by verified views, would clarify this as appropriate.

The initial analysis indicates that, subject to detailed design and associated assessment, the emerging proposals for the Site could potentially be brought forward without harm to the significance, or ability to appreciate the significance, of identified designated heritage assets in the surrounding area.

## Townscape and Visual Considerations

A site survey of the baseline situation was undertaken by Montagu Evans during March 2019 to understand the immediate setting of the Site and to identify the townscape character and appearance.

The initial townscape and visual analysis of the emerging proposals has considered the Site's existing context, including neighbouring buildings, the relationships between them, the different types of urban open spaces in the vicinity and the relationship between buildings and open spaces. The visual analysis has considered how people may be affected by changes in views and visual amenity at different places, including publicly accessible locations.

The existing buildings at the Site, though some are of limited architectural merit, are generally in poor condition and the urban realm is of a relatively poor quality and is considered to be inadequate as a key component of the Wembley Area Action Plan.

The emerging proposals would result in the loss of the existing Edwardian and inter-war terraced residential properties, however, much of the wider character of this part of Wembley, including the buildings on the southern side of Elm Road are generally more modern in comparison and the loss is not considered contrary to planning policy providing a high quality design replacement and associated benefits are being provided in its place. The emerging proposals include the provision for a replacement church facility and for a new landscaping scheme that would provide new high quality public realm and improved pedestrian permeability.

The denser, urban character proposed would respond to the immediate context to the south and east, whilst being separated from the suburban residential townscape to the north and west by the existing railway lines.

When considered in the round, the emerging proposals have the potential to demonstrably improve the appearance, character and function of the townscape, in accordance with the development plan and aspirations for the Wembley Growth Area/Opportunity Area. Providing an opportunity for the delivery of a significant development in a location of strategic importance, which could exceed the aspirations of the development plan and positively contribute to the future growth needs of the Borough and London.

Within the local and wider townscape the proposals have been considered in relation to key viewpoints, the locations of which have been informed by an appraisal of the existing Site and surroundings and relevant policy designations.



# BRIEFING NOTE

Key viewpoint considerations for the Site and design considerations are detailed below:

- Protected views of the Wembley Arch – Local Area (Policy WEM 6 of the WAAP):
  - The Wembley AAP identifies Local and Wider Protected Views of the National Stadium. Figure 1 demonstrates that the Site falls outside of the viewing corridors for the identified local views and therefore the emerging proposals are unlikely to impact the skyline silhouette of the National Stadium. The proposals could potentially fall within the distant background of views from the Metropolitan Line and Jubilee Line north of Neasden Station (View no. 10). Further consideration of potential impacts on this local view would be subject to detailed design and associated assessment, as appropriate.

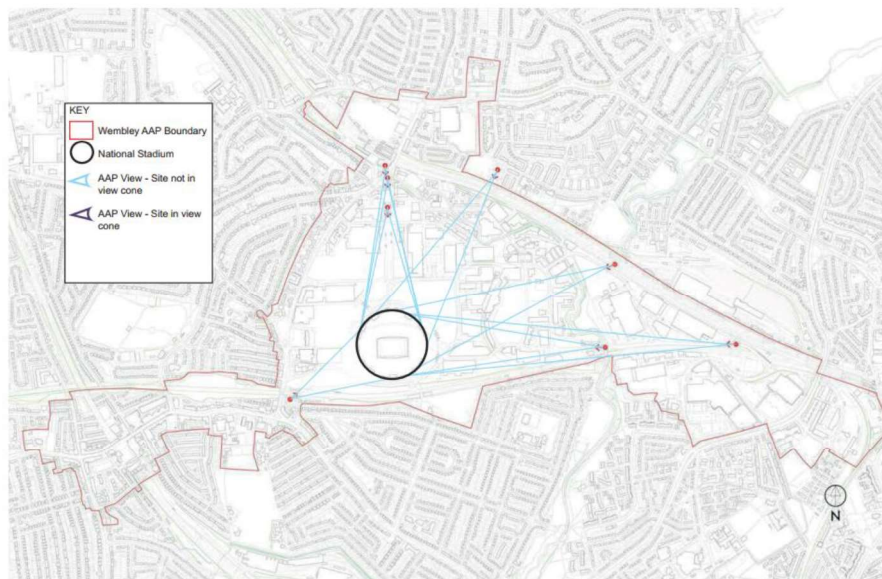


Figure 1: Protected Local Views (Wembley Area Action Plan, 2015)

- Protected views of the Wembley Arch – Long Distance (Policy WEM 6 of the WAAP):
  - Figure 2 demonstrates that the Site falls outside of the viewing corridors for the identified long distance views and therefore the emerging proposals are unlikely to impact the skyline silhouette of the National Stadium. Further consideration of potential impacts could be subject to detailed design and associated assessment, if necessary.

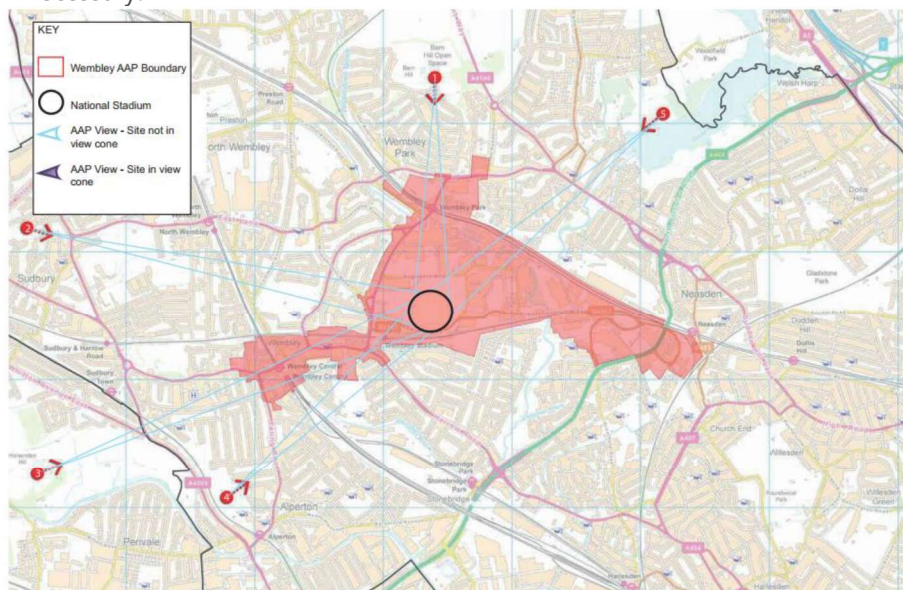


Figure 2: Protected Long Distance Views (Wembley Area Action Plan, 2015)

# BRIEFING NOTE

- Approach views in the local area:

- A number of viewpoints were considered and from the majority of viewpoints in the surrounding area, the emerging proposals would be visible within a context that includes the taller buildings of the Wembley Link and/or Wembley Central and High Road.

The emerging proposals, subject to detailed design, have the potential to form part of an attractive skyline composition and meet the objectives of local view management guidance. To comply with Policy WEM5, a detailed townscape and visual analysis informed by verified views would be undertaken to inform detailed design and as part of any relevant forthcoming planning applications.

## Heritage, Townscape and Visual - Summary

When considered in the round, the emerging proposals for the Site have the potential to demonstrably improve the appearance, character and function of the townscape and deliver a significant development in a location of strategic importance, which could significantly contribute to meeting the future needs of the Borough and London. A suitable site allocation could support a co-ordinated approach with appropriate planning and design parameters to guide the delivery of a significant site in the Wembley Growth Area and Opportunity Area and positively contribute to the evolving character of the area.

## Emerging Planning Policy Context

Having regard to the above, we provide a review of the emerging local planning policy context relevant to the Site.

### Brent Local Plan, Preferred Options (November 2018)

In accordance with sustainable development principles, and paragraph 11 of the NPPF, development plans:

*'... should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change'*

Brent has a significant need for new development over the existing and forthcoming plan period, particularly new housing and business floorspace. The draft Local Plan documents acknowledge that the majority of additional floorspace provision will need to come from intensification of already developed sites, especially in highly accessible locations, designated growth areas (including the Wembley Opportunity Area) and town centres. The Brent Tall Building Strategy (BTBS) (November 2018) highlights that tall buildings, which meet site specific and policy requirements, can have a positive role in contributing to this growth. They can deliver significant amounts of new floorspace and act as landmarks at nodal points in the urban fabric, enhancing the legibility of an area and positively contributing to the appearance of the townscape and skyline.

Chapter 11 of the NPPF promotes the effective use of land and highlights that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for development meeting identified needs, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

The draft Local Plan acknowledges that the Wembley Growth Area is a 'transformational area' where additional tall buildings are considered appropriate (para 5.1.16). One of the key objectives of the draft Local Plan includes that development should make efficient use of land and fully integrate with, and relate positively to, its immediate neighbours and locality. This principle ensures that regard is had to the existing townscape whilst enabling sensible evolution of character and facilitating new development. Further guidance on the location and scale of tall buildings in Brent is set out in the Draft Brent Tall Building Strategy, which is discussed below.

### Draft Brent Tall Building Strategy (November 2018)

The draft Brent Tall Building Strategy (BTBS) forms part of the evidence base of the draft Local Plan documents. It has, and will, inform the drafting of the Local Plan and Draft Policy BD1 (Tall Buildings in Brent) and relevant spatial strategy policies.

The baseline study and its locational objectives are welcomed and reflect the requirements of the London Plan (both existing and emerging) and Historic England's Advice Note on Tall Buildings (2015) which encourage a plan-led approach to identifying locations where tall buildings may be appropriate, subject to meeting the requirements of other policy objectives.

# BRIEFING NOTE

The strategic search approach detailed in Section 2 of the BTBS has enabled areas that may potentially be suitable for tall buildings to be identified across the Borough, including the Wembley Opportunity Area (Area 1 on map on page 19). Within this search area the BTBS includes the Site within sub area '9.1B Wembley Central' (see Figure 3). The methodology and approach is generally supported, acknowledging that much of the Borough consists of less accessible areas of relatively mid-low rise residential townscape likely to be unsuitable for tall buildings and that areas potentially suitable for tall buildings are typically identified centres, opportunity areas and/or areas with high levels of public transport accessibility with a character that in principle could accommodate tall buildings and meaningfully contribute to a legible townscape (as per London Plan Policy 7.7).

The identification of the Site in the Wembley Area Action Plan, which has informed the BTBS, as inappropriate for tall buildings is considered to be on the basis that the existing development at the Site would be retained. This designation is considered overtly restrictive and could prevent a holistic approach to delivering significant growth across a large site within the Wembley Growth Area/Opportunity Area that benefits from excellent public transport accessibility levels (PTAL 4-6a) and proximity to local amenities.

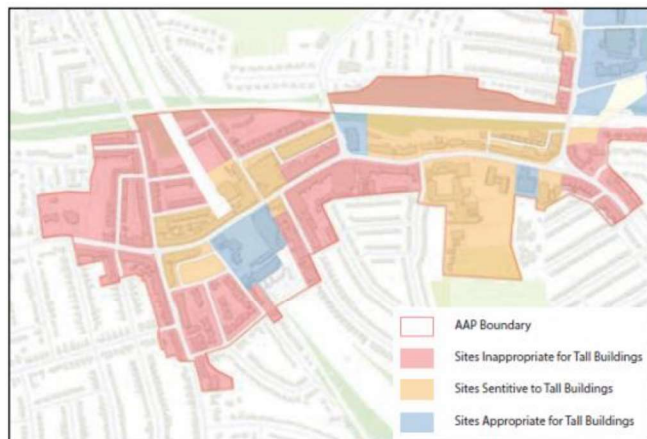
## 9.1B Wembley Central

### Policy:

- Major Centre
- Wembley Area Action Plan (2015)
- Wembley Housing Zone

### Strategy:

- Various part along the High Road are identified as sensitive to tall buildings and as inappropriate behind this, among existing residential low-rise.
- New tall buildings may be appropriate in some parts, but the opportunity for very tall buildings (up to 20 storeys) is very limited. Adjacent to existing low-rise areas, 5-storey development may be appropriate.



Character:	
Average height	Mixed (2-10 storeys)
Height range	1-26 storeys
Uses	Residential, commercial
Built form	Mixed, High Street
Style / age	Mixed
Conservation	Listed buildings
PTAL	4-6a
Appropriate heights	5-20 storeys (15-45m)

Figure 3: Sub-area 9.1B Wembley Central (Draft Brent Tall Building Strategy, November 2018)

We consider that the proposed strategy for the Wembley Central sub area is overly restrictive and could unnecessarily hinder potential development in the Borough. We suggest that the strategy for the sub area should be similar to that proposed for the Wembley Park sub area, which is that 'appropriate heights are to be determined on a site by site basis' (page 21).

We identify three primary concerns with the current strategy proposed for the Wembley Central sub area:

1. **Design:** As detailed in relevant planning policy the appropriateness of development is dependent on a number of considerations, a key consideration being design. High quality design is supported by planning policy and provides a means of mitigating potentially adverse impacts. Design of potential tall buildings has not been adequately considered by the BTBS, indeed it never could be.
2. **Verified Views and Detailed Site Survey:** In accordance with best practice, and the Council's existing and emerging planning policy, robust assessment of the visual impact of a tall building is essential to determine whether a proposal is appropriate for a site and its context. Applications for tall buildings must provide



# BRIEFING NOTE

appropriate supporting material – typically including detailed 3d modelling and Accurate Visual Representations (AVRs) – to verify the visual impact of proposed development on protected views, heritage assets and townscape.

3. **Accounting for change over the plan period (adaptability):** As per paragraph 3.8.2 of the Draft London Plan, in large areas of extensive change, such as the Wembley Opportunity Area, the threshold for what constitutes a tall building should relate to the evolving (not just the existing) context. The BTBS does not sufficiently account for changes to sites within the search area over the plan period. Therefore the restrictive approach it is currently proposing for the Wembley Central sub-area is not considered appropriate and the BTBS does not allow sufficient flexibility to adapt to any changes that are likely to occur over the plan period, as required by paragraph 11 of the NPPF.

The BTBS is a credible evidence base that could be used to identify potential areas suitable for tall buildings within the draft Local Plan, but is not deemed sufficient to replace the need for site specific assessment of proposals within identified areas through the planning process.

It is our view that it is far more sensible, given the strategic importance of the Wembley Opportunity Area, for the locational guidance to be less precise in the Wembley Central sub area, adopting a broad locational approach and undertaking a more detailed analysis of the potential for site allocations within the key area to accommodate tall buildings.

We consider that there is potential for a taller building(s) on the subject site, having regard to the existing and emerging context to the south and east (including Chesterfield House) and that the suburban residential townscape to the north and west is separated from the Site by existing railway lines.

## **Emerging Planning Policy - Summary**

We suggest that proposals for tall buildings at the Site within the Wembley Central sub area could be appropriate and should be scrutinised on a site by site basis through the planning application process and/or through more detailed site specific policy (e.g. Draft Site Allocation BSWSA Wembley High Road) and/or supplementary planning guidance such as masterplans (e.g. as has been the case with the Wembley Link SPD (2011) and Wembley Masterplan (Adopted June 2009)).

## **APPENDIX 1**

**HERITAGE ASSET PLAN**

Application Site

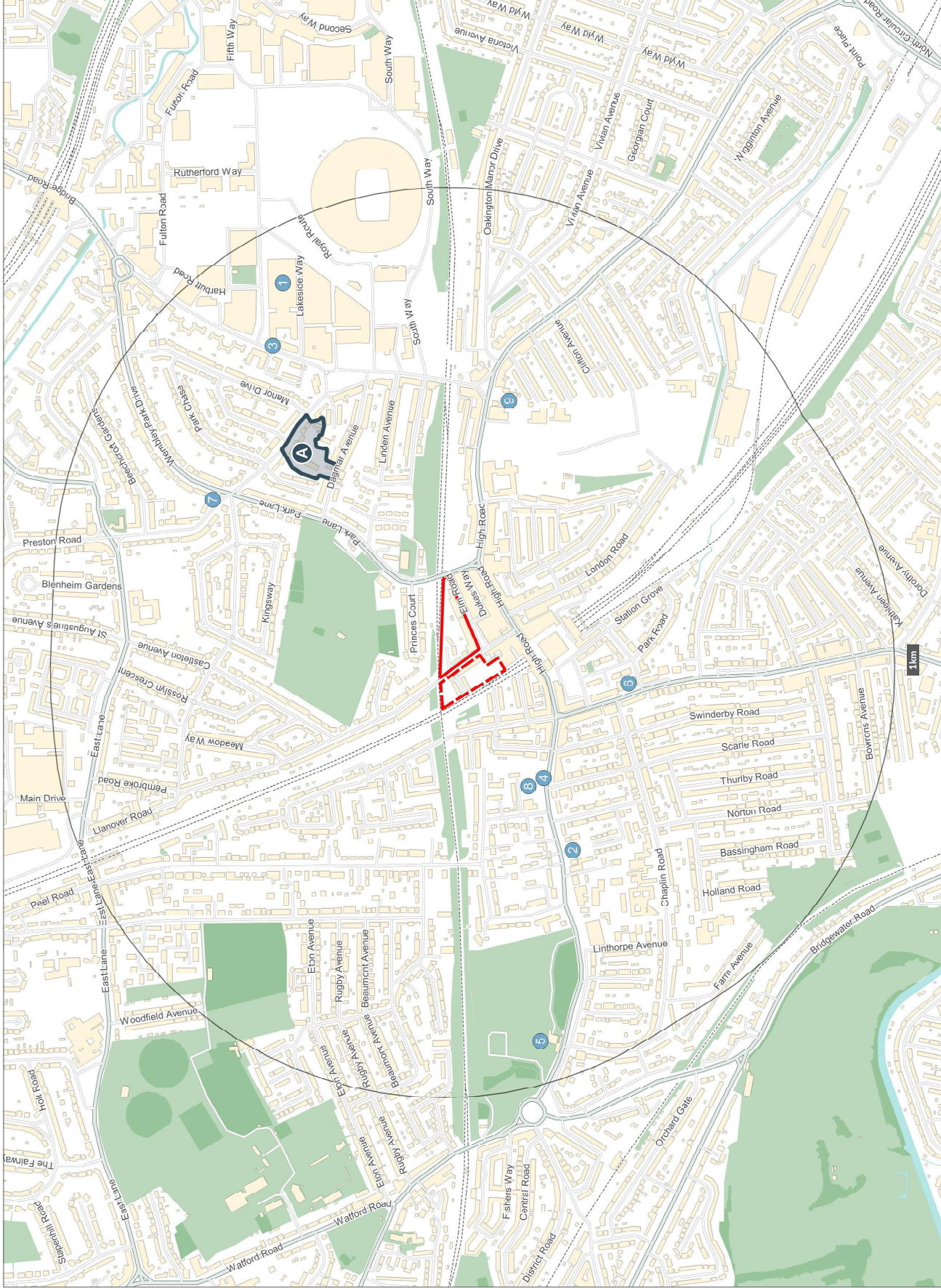
Conservation Areas

- A. Wembley High Street CA (Brent Council)

Listed Buildings

Grade II

1. Wembley Arena (Formerly The Empire Pool)
2. Wembley Fire Station
3. 3 K6 Telephone Kiosks
4. Front Boundary Wall And Lych Gate Of St John's Church
5. Garden Walls, Gates, Pergola Of Sundial On Portland Stone Ionic Columns At Barham Old Court
6. St Andrew's Presbyterian Church
7. Wembley Hill Lodge
8. Church Of St John
9. Roman Catholic Church Of St Joseph



Location:  
Elm Road, Wembley

Date:  
March 2019

Scale:  
1:10000 @ A3

Figure:

North