

## **PRE-APPLICATION REPORT TO COMMITTEE**

**Planning Committee on**            **24 May 2017**  
**Item No**  
**Case Number**                    **16/1541/PRE**

### **SITE INFORMATION**

**RECEIVED:**                        **2016**

**WARD:**                              **Tokyngton**

**LOCATION:**                         Latif House, First Way, Wembley, HA9 0JD

**SCHEME:**                        Proposed demolition of existing buildings and proposed erection of a new hotel and apart-hotel, with conferencing facilities and car parking.

**APPLICANT:**                    AWW Inspired Environments

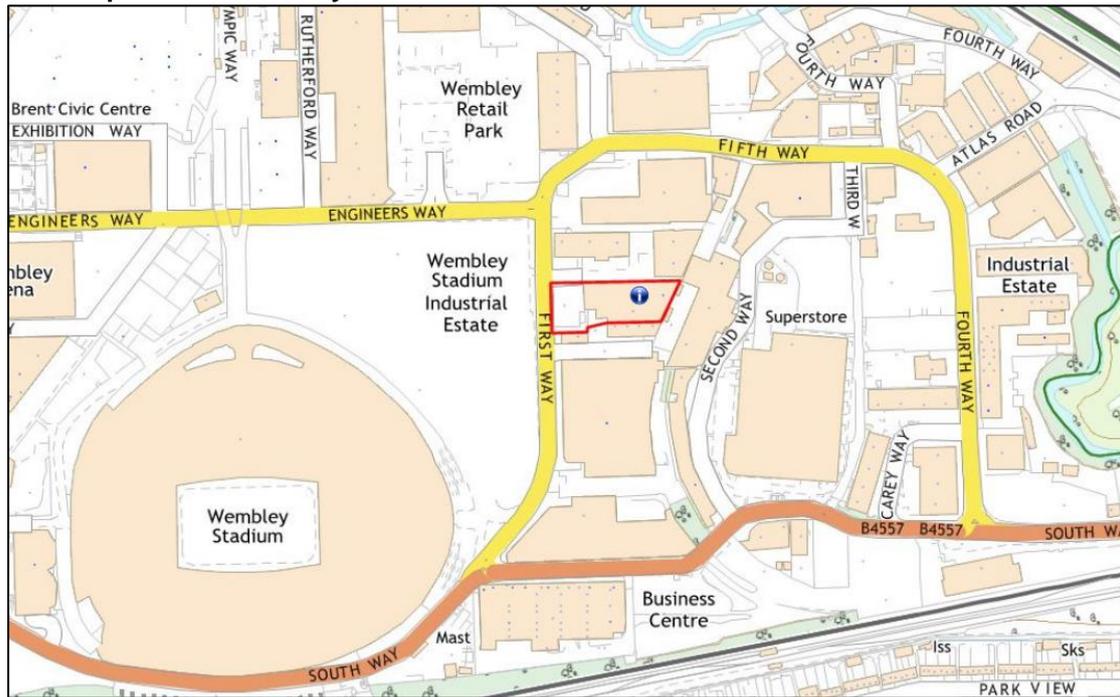
**CONTACT:**                        Mr Chris Mitchell

**OFFICER:**                         Toby Huntingford (North Team)

**LINK TO DOCUMENTS**            No plans as this is a pre-application item. Members will view  
**ASSOCIATED TO**                    a presentation at Committee.  
**THIS APPLICATION**

# SITE MAP

This map is indicative only



## **BACKGROUND**

1. This pre-application submission for a new hotel and apart-hotel development is being presented to enable Members of the committee to view it before any subsequent applications are submitted and to comment upon it. The development does not constitute an application for planning permission and any comments made upon it are provisional and subject to full consideration of any subsequent revised application and the comments received as a result of consultation, publicity and notification.
2. This is the first time the proposals shown within this submission have been presented to Members.

## **PROPOSAL and LOCATION**

### **Proposal**

3. The application will seek approval of the new development which proposes the demolition of existing buildings and erection of a new hotel and apart-hotel, with conferencing facilities and car parking.

#### Proposed uses

4. The hotel is proposed to measure c. 50m in height, with approx. 16 storeys containing 274 hotel rooms and ancillary facilities. The apart-hotel is proposed to measure c. 32m in height, with approx. 11 storeys containing 186 apart-hotel rooms and ancillary facilities.

#### Car parking

5. A four level basement is proposed, containing 405 car parking spaces.

### **Site and Surroundings**

6. The subject property, Latif House, comprises low rise industrial premises within the Wembley Stadium Industrial Estate on First Way. Surrounding uses are also industrial.
7. To the north is another industrial unit, the Cannon Trading Estate. Beyond the Cannon Trading Estate to the north is Kelaty House, presently another industrial unit, although permission has been granted for the site's redevelopment for mixed use incorporating student accommodation and commercial space.
8. To the south is the Mirage Centre, another industrial unit, to the east are further industrial units fronting second way. These adjoining land uses are all similarly industrial in nature and form the westernmost part of an area previously designated as Strategic Industrial Land (SIL).
9. The land to the west, immediately across First Way forms part of the Quintain Masterplan Development (Plot E03) for which a reserved matters application has recently been submitted (17/0016). This plot is proposed to provide 743 residential units, 569sqm of commercial space and an energy centre as part of the wider masterplan development around Wembley Stadium.

### **Planning History**

10. There is no relevant planning history for this property

## CONSULTATION

11. In accordance with the National Planning Policy Framework and Brent's Statement of Community Involvement the developer is required to engage with the local community whilst developing their proposals for the site. No details on such consultation have yet been provided, however this will be expected as part of a full application.
12. The proposals to date have been subject to internal consultation with the Council's Planning Policy department, Transport officer, Regulatory Services and Urban Design officer.
13. The following will be consulted regarding any subsequent planning application:

Consultee:-  
(Internal)

- Ward Councillors for Tokyngton (Brent)
- Transportation (Brent)
- Environmental Health (Brent)
- Landscape Design (Brent)
- Heritage & Conservation officer (Brent)
- Tree Officer (Brent)
- Urban Design Officer (Brent)
- Flood/drainage engineer (Brent)

(External)

- Thames Water
- Greater London Authority (GLA)
- Transport for London (TfL)
  
- All existing properties and addresses within at least 100m of the application site.
- The wider community will be consulted through a site notice close to the property and a notice printed within the Brent and Kilburn Times local newspaper.

*(N.B. This is not a final list and is subject to further review/change should any formal planning application be submitted)*

## POLICY CONTEXT

14. The National Planning Policy Framework (NPPF) 2012. At the heart of the NPPF is a presumption in favour of sustainable development. Building a strong, competitive economy is of the core principles of the NPPF and paragraph's 21 and 22 are of relevance.
15. London Plan consolidated with alterations since 2011 (March 2016)
16. Wembley Area Action Plan (WAAP) (2015)
17. Development Management Policies (DMP), London Borough of Brent (2016) – adopted 21 November 2016

The following Policies within the DMP will be relevant to this proposal:

- DMP1: General Development Management Policy
- DMP6: Visitor Accommodation and Attractions
- DMP11: Forming an Access on to a Road
- DMP12: Parking
- DMP13: Movement of Goods and Materials

18. London Borough of Brent LDF Core Strategy (2010)

The following policies within the Core Strategy will be relevant to this proposal:

- CP1 Spatial Development Strategy
- CP5 Placemaking
- CP7 Wembley Growth Area
- CP16 Town Centres and the Sequential Approach to Development

19. Supplementary Planning Guidance 17 'Design Guide for New Development' (2002) –

This would not be used to assess accommodation standards, but would be used to consider the general impact of the development on neighbouring sites and properties

## **MATERIAL PLANNING CONSIDERATIONS**

20. The main issues relevant to this proposal that the Committee should be aware of at this stage are:

- Principle of development
- Scale, height, massing and design of the development within its local context
- Design and layout
- Impact on amenities of neighbouring properties
- Transport
- Environmental health

### **Issue 1**

#### **Principle of development**

21. Latif House is located within Wembley Strategic Cultural Area as designated within the Wembley Area Action Plan (WAAP) (2015). As part of this designation, the area is identified as appropriate for leisure, tourism and cultural uses. The principle of visitor accommodation and a conference facility on part of the site is therefore supported by site allocation W28, provided it can be demonstrated this will not preclude the achievement of 1,500 residential units across the site allocation as a whole.
22. Following a pre-application meeting with the applicants which took place on 25 January 2017, the agent has modelled a projected development of the wider W28 site allocation which accounts for the consented scheme at Kelaty House (plot 1) as well as the subject proposal at Latif House (plot 3). The model identifies that the proposal for such a significant hotel use within the surrounds of Kelaty House and wider W28 plot, would result in an under-provision of residential units (by 158 units), cafés / bars (by 877m<sup>2</sup>) and workspace / creative uses (by 7093m<sup>2</sup>). For the proposal to be acceptable in principle the development of this plot must include at least 158 residential units, additional café/bar use and workspace/creative uses to account for the shortfall identified within the projection.
23. The agent has sought to identify potential locations within the W28 plot where it is considered that the shortfall in space can be provided to ensure the requirements of the site allocation can be met. These projections have significant implications for the wider delivery of the Strategic Cultural Area as envisioned within the WAAP and as such are being considered carefully by Brent's planning policy team.
24. The policy team do not consider that the viable delivery of the site allocation has been sufficiently demonstrated under the current model and further work in relation to this is therefore ongoing. The Council will need to agree with and verify the rationale behind this modelling of the W28 plot before the proposal will be acceptable in principle.

## **Issue 2**

### **Scale, height, massing and design of the development within its local context**

25. The initial architectural approach in terms of materials and aesthetics (as detailed on plan 0060) is considered to acceptable in principle. The yellow colour will provide an eye-catching feature whilst the extensive glazing will help to ensure the building is appropriate in the evolving environment. The use of unattached beams towards the top of the building provides a distinctive feature which helps to articulate the individual elements of the hotel.
26. Despite a positive architectural approach, a principal issue with the development at present is the proposed height of the building. It is accepted that the area is going to go through substantial change and that the emerging context for the surroundings is for tall buildings, particularly to the west within the Masterplan area, as well as with the pending development of Kelaty House to the north. Kelaty House is located at the corner of Engineers Way and First Way and has a consented height which reaches approx. 43m with 12 storeys along its frontage.
27. The first issue with regard to the height concerns the frontage of the building along First Way. Kelaty House, which is located on the corner to the north, is considered to justify a greater height by virtue of its more prominent location. Latif House, further along First Way, should be lower in height to respect urban role order. The proposed hotel at present will achieve a height of 50m with 16 storeys which would appear incongruous within the wider streetscene and would not respectfully appear subservient to the building occupying the more visually prominent site at Kelaty House.
28. The second issue with regard to the height concerns the rear of the building, where it borders with industrial units fronting Second Way. The units along Second Way fall outside the W28 site allocation and will continue to form part of the Wembley Stadium industrial estate following regeneration of the nearby plots. As such, development of the W28 plot needs to respect the transition between high density residential development within the Masterplan to the west and the established low rise industrial development to the east. As such, a more notable reduction in height from the west to the east of the site is needed. The 35 or so metre high rear component is too high and something that establishes a more comfortable transition will be needed at the rear.
29. The proposed basement levels would represent a significant proportion of the overall provision of floors (4 out of 20). Whilst it is noted that the basements will be used to provide ancillary uses (parking), the fact that the parking provision has been identified as approx. 300-400% more than would be permitted under policy (see below) it is not considered that this can be justified.

## **Issue 3**

### **Layout and Design**

30. There are no policies which would require the Local Planning Authority to assess the quality of hotel accommodation, although the proposed layout would appear to be typical of such developments.
31. The ground floor of the hotel will accommodate a large entrance atrium (for the height of two storeys) as well as a bar and restaurant, associated staff areas as well as staff areas for plant and deliveries. Active frontages would be focussed towards the front of the property on First Way, where the lobby and bar would be heavily glazed and open on to the street. The first floor will continue the glazing into atriums above the reception area and bar which helps to provide an additionally welcoming and activated frontage. The first floor is also proposed to contain a 1000sqm

banquet/conference hall as well as a second bar to the rear of the development. The applicant is advised to ensure that active frontages are most prominently focussed along the western elevation (along First Way) and the southern elevation of the building to ensure a good standard of built environment along the proposed east-west pedestrian link required as part of this development (see below). The second floor is to contain pool, spa and retail units with the remainder of the development being comprised of hotel bedrooms.

32. The apart-hotel to the rear is proposed with a more modest entrance space to the south and a large gym, which also provides potential for strong active frontages. The apartment rooms are proposed on the upper floors with a green roof proposed atop the development. One of the upper floors includes a proposed elevated pedestrian link between the rear of the hotel and the front of the apart-hotel buildings.
33. Research undertaken by the GLA identifies a lack of accessible visitor accommodation in the capital. As such there is a requirement for 10% of hotel rooms to be wheelchair accessible and applications to be accompanied by an Accessibility Management Plan. This is distinct from a Design & Access Statement and guidance on the content can be found in the Mayor's Town Centre SPG.
34. In accordance with Brent's policy DMP 6 within the Development Management Policies (2016) the council will need to be satisfied the aparthotel will form visitor accommodation and not be permanently occupied. Conditions will be applied to this effect.

#### **Issue 4**

##### **Impact on amenities of neighbouring properties**

35. The development of the site will create a buffer between proposed residential development to the west and the industrial uses in Wembley Strategic Industrial Location to the east. The development will be required to have careful regard to the relationship with, and impact of, the waste facility on Fifth Way and adjoining industrial uses, and demonstrate an acceptable amenity can be achieved.
36. A key part of achieving this will be ensuring that a separation of at least 10m is established from the built form of the development to all site boundaries so as not to preclude surrounding development of the W28 plot. It is not so important to establish this separation to the east since the existing industrial units will not require amenity protection; however it will be important to ensure that the built form that abuts the development to the east is of a suitably complementary scale that would not dominate the environment from within these industrial units.
37. The site is identified in the Wembley Area Action Plan as sensitive to tall buildings. Tall buildings in this location have potential to impact on protected views to the National Stadium. It is noted the current proposal falls below the threshold for tall buildings nonetheless, the Design & Access Statement should include an assessment of the impact of protected views as identified in the Wembley Area Action Plan.

#### **Issue 5**

##### **Transport**

38. Policy WEM28 applies to this site and a key requirement is an east-west pedestrian link along the southern side of the site. Any development will need to accommodate this link and construct it to a high quality standard, so that it can be adopted in future once a connection through to Second Way is completed. The highways department

will therefore need to approve detailed drawings of the link and inspect the construction as it proceeds which can be secured through a legal agreement.

39. The revised plans indicate that a coach access is proposed along the southern side of the site along with coach parking spaces. The way that the coach parking interacts with a proposed pedestrian link must be made clear as part of a planning application and unless it can be demonstrated that a high quality pedestrian environment can still be provided alongside this access, it may be necessary to relocate the vehicular access and layout. A tracking diagram should also be provided indicating that coaches can easily manoeuvre in and out of the site.
40. With regard to the hotel use, the site has a moderate PTAL rating of 3, so up to a maximum of one car parking space per 5 bedrooms is permitted. This equates to a maximum allowance of 92 car parking spaces, so the proposed provision of 405 spaces is far above the acceptable limit and is also out-of-kilter with other hotels in the Wembley area.
41. The DMP also requires at least one coach parking space per 50 bedrooms, giving a total requirement for five to six such spaces. Within the revised plans, four coach parking spaces have been shown alongside the hotel; although no justification for why the under-provision is acceptable has been provided. Given the popularity of the Wembley Park area as a visitor location, it will be necessary for a clear and demonstrable justification to be put forward if this coach parking arrangement can be supported.
42. The principle of a one-way in/out driveway along the front of the building with separate crossovers for access and egress is acceptable. This will allow short-stay casual parking, including for taxis and will also accommodate coach access.
43. As part as a full submission, bicycle parking will need to be provided for 23 short-stay spaces for visitors and 10 long-stay spaces for staff.
44. Finally, the application will need to be accompanied by a full Transport Assessment and a full Travel Plan to allow the Council to consider wider transport impact. If the travel plan is acceptable, it is likely to be subject to monitoring under terms of a Section 106 agreement.

## **Issue 6**

### **Environmental Health**

45. The Council's Regulatory Services have identified key environmental health issues as: Noise insulation for guests given the proximity to commercial premises, impact on air quality, construction noise and dust, asbestos, odour from the commercial kitchen, the potential for light pollution from any external lighting and the potential for the land to be contaminated.
46. The abovementioned concerns will need to be addressed as part of a full planning application with planning conditions or informative notes as appropriate. The noise insulation will be addressed through requirements for:
  - Adherence to (and a test of) the relevant British Standards for sound insulation for hotel bedrooms
  - A requirement to ensure suitable background noise from plant equipment;
  - The submission of an air quality impact assessment to consider the air quality impact building works and the operations of the building will have on local air quality and future residents;
  - The submission of an air quality neutral assessment in accordance with GLA guidance;

- A construction method statement to detail measures that will be taken to control dust, noise and other environmental impacts of construction;
- A lighting spillage plan to demonstrate that the external lighting from the new development will not impact on the surrounding residential premises;
- Details of the extract ventilation system and odour control equipment for the commercial kitchen, including all details of external ducting; and
- A report detailing a site investigation into the potential contamination of the land and an associated remedial works report in the event that any contamination is identified.

## **OTHER CONSIDERATIONS**

47. A detailed energy/sustainability strategy would need to be submitted as part of any subsequent full application to demonstrate compliance with the Mayor's strategy of Be Lean, Be Clean, Be Green, as well as London plan policies relating to reduction carbon emissions and renewable energy, in accordance with London Plan policy 5.2.

## **PLANNING OBLIGATIONS**

48. If approved, planning obligations under a Section 106 agreement will be necessary to secure and monitor certain aspects of the development. With the information available at present, it is likely that a Section 106 agreement will be needed for the following aspects:
- To ensure that the Council is notified of development commencement at least 28 days prior to works starting.
  - To enable the development of the proposal to improve the training and employment of Brent residents.
  - To secure and monitor a travel plan.
  - To secure and monitor the construction of an east-west pedestrian link along the southern side of the site forming part of the Wembley Area Action Plan. Any development will need to accommodate this link and construct it to a high quality standard, so that it can be adopted in future once a connection through to Second Way is completed.
  - To secure any other financial contributions that may be required by the Council
  - Any other obligations required (at this time not known)

## **COMMUNITY INFRASTRUCTURE LEVY (CIL)**

49. This would be development that is liable to pay Mayoral and Brent Community Infrastructure Levy (CIL). The CIL payment would be calculated by:
- For each square metre of proposed floor space within the hotel and apart-hotel, £135 will be liable for payment under the Community Infrastructure Levy. Of the per square metre payment, £100 pays for Brent CIL and £35 pays for Mayoral CIL.
  - If the existing floorspace of the building has been in use for at least 6 of the previous 36 months then the existing floorspace can be deducted from the total proposed floorspace resulting in a proportion of the proposed building that will be exempt from a CIL charge.

## **CONCLUSIONS**

50. Members should note the above development is still in the pre-application stage and that additional work remains to be carried out prior to the submission of any subsequent planning application.