

COMMITTEE REPORT

Planning Committee on
Item No
Case Number

15 November, 2017
05
17/3188

SITE INFORMATION

RECEIVED	17 July, 2017
WARD	Wembley Central
PLANNING AREA	Brent Connects Wembley
LOCATION	1-7, 9, 11 & 11A Elm Road, Wembley, HA9 7JA
PROPOSAL	Demolition of existing hotel buildings and erection of a part 3, part 4 and part 5 storey 128 bed aparthotel plus basement accommodation comprising guestrooms and ancillary facilities within a 4-storey basement (situated below the part-basement lower ground floor), together with soft and hard landscaping, servicing, cycle storage and refuse and recycling facilities (revised description)
APPLICANT	London Hotel Group
CONTACT	GVA
PLAN NO'S	Refer to condition 2.
LINK TO DOCUMENTS ASSOCIATED WITH THIS PLANNING APPLICATION	<p><u>When viewing this on an Electronic Device</u></p> <p>Please click on the link below to view ALL document associated to case https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=DCAPR_135399</p> <p><u>When viewing this as an Hard Copy _</u></p> <p>Please use the following steps</p> <ol style="list-style-type: none">1. Please go to pa.brent.gov.uk2. Select Planning and conduct a search tying "17/3188" (i.e. Case Reference) into the search Box3. Click on "View Documents" tab

RECOMMENDATIONS

Resolve to grant planning permission subject to conditions and the completion of a satisfactory Section 106 or other legal agreement.

Section 106 Heads of Terms

1. Payment of legal and professional costs;
2. Notification of commencement;
3. Training and employment plan targeting Brent residents;
4. A financial contribution of £10,000 towards the planting of street trees along the frontage of the development
5. A financial contribution of £445,320 towards a local carbon off-setting scheme to achieve the targets for carbon reduction, should those targets not be met through on-site measures.
6. Submission and approval of an amended Travel Plan of sufficient quality to secure a PASS using TfL's ATTrBuTE programme and the implementation and monitoring of the travel plan;
7. Any other planning obligation(s) considered necessary by the Head of Planning

That the Head of Planning is delegated authority to negotiate the legal agreement indicated above.

That the Head of Planning is delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

Conditions

1. Time Limit for commencement
2. Approved drawings/documents
3. Restriction on occupancy length
4. Building use restriction
5. Specific windows to be obscure glazed for privacy of neighbours
6. 10% accessible bedrooms to be provided and maintained
7. Accessibility Management Plan to be adhered to
8. Coach Management Plan and Delivery and Servicing Management Plan to be adhered to
9. Crossover works to be completed prior to occupation
10. Considerate Constructors' Scheme membership
11. Cycle Parking to be installed prior to occupation
12. Approval of materials
13. Construction and Demolition Method Statement
14. Piling Statement
15. Plant noise
16. Kitchen extract details
17. Drainage strategy
18. Surface water management strategy
19. Landscaping details
20. External lighting details
21. Air quality neutral assessment
22. BREEAM post construction stage review
23. Tree protection measures

Informatives

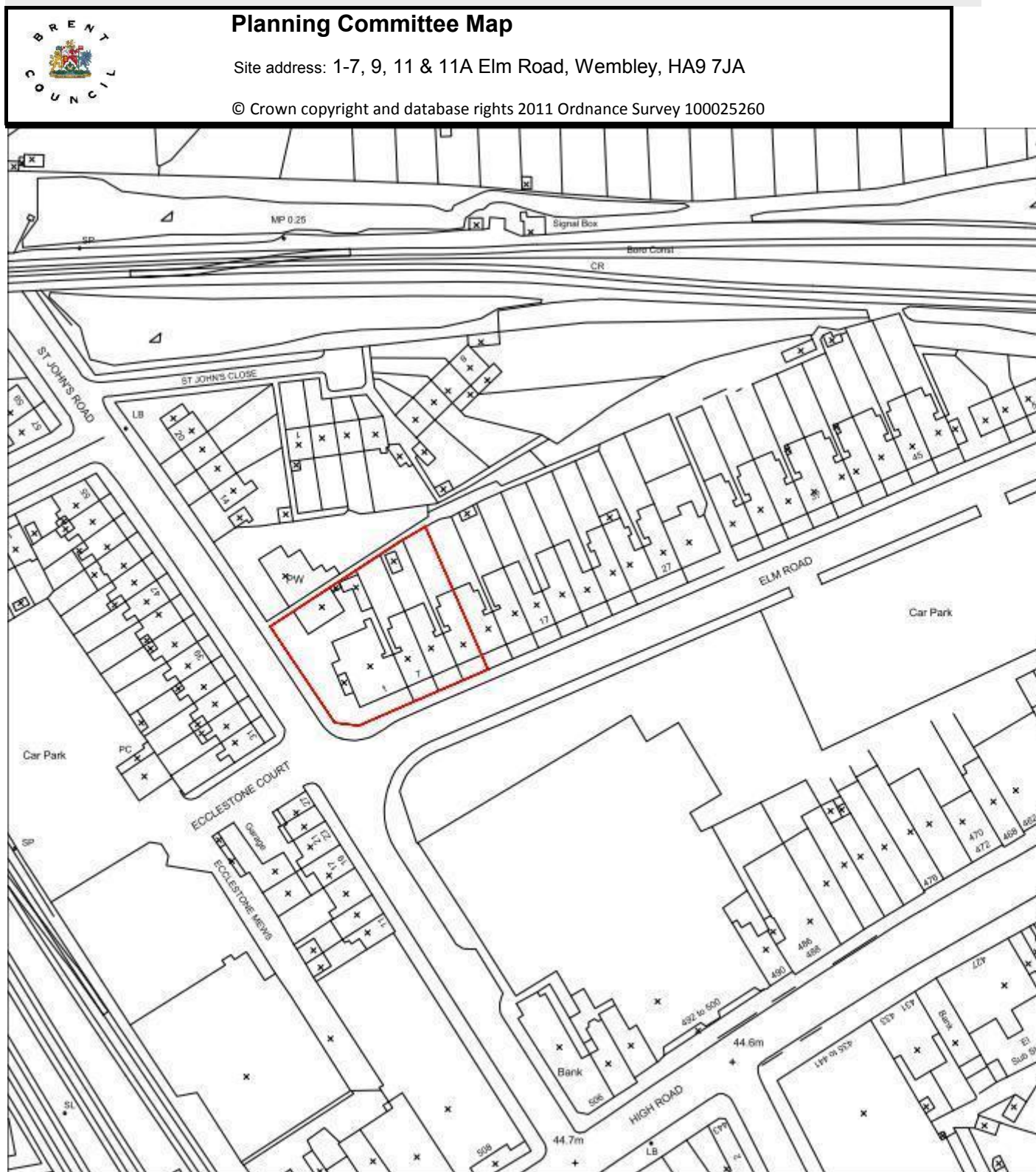
1. Construction Hours
2. Guidance notes from Thames Water (1)
3. Guidance notes from Thames Water (2)
4. Advertisement Consent
5. Contact highways for crossover works
6. Notify highways service of intent to commence works
7. Tree protection informative
8. CIL liability informative

That the Head of Planning is delegated authority to make changes to the wording of the committee's decision (such as to delete, vary or add conditions, informatives, planning obligations or reasons for the decision) prior to the decision being actioned, provided that the Head of Planning is satisfied that any such changes could not reasonably be regarded as deviating from the overall principle of the decision reached by the committee

nor that such change(s) could reasonably have led to a different decision having been reached by the committee.

That, if by 3 months of the committee date the legal agreement has not been completed, the Head of Planning is delegated authority to refuse planning permission.

SITE MAP



This map is indicative only.

PROPOSAL IN DETAIL

The proposal seeks to demolish the five existing terrace house buildings that comprise the current hotel. A replacement aparthotel building of a more modern character is proposed in its place. The new aparthotel will accommodate 128 bedrooms/suites, associated back of house and staff areas, a guest lounge as well as a restaurant, gym and leisure centre for the use of guests. These facilities will be contained across five storeys above ground and across three basement levels.

An off-street taxi drop-off area as well as access to the aparthotel's internal service bay are proposed along the St John's Road frontage.

Four short stay cycle spaces are proposed along the Elm Road frontage, close to the edge of the site.

EXISTING

The subject site is situated on the north-east corner of the junction of Elm Road and St John's Road in Wembley, approximately 100m from Wembley High Road and 200m from Wembley Central railway and tube station. It comprises a set of five Edwardian terrace houses that have long been repurposed for use as a hotel containing 61 bedrooms and associated car parking space. The existing hotel is situated just outside of the designated Wembley Town Centre boundary, with the buildings just across the road (on the south side of Elm Road) being within the boundary of the town centre. The site is within the Wembley Growth Area.

The subject site is not within a Conservation Area, nor is the building listed.

SUMMARY OF KEY ISSUES

The key planning issues for Members to consider are set out below. 4 objections have been received regarding some of these matters. Members will need to balance all of the planning issues and the objectives of relevant planning policies when making a decision on the application:

1. **Intensification of use:** The proposal will result in a significant intensification of an existing hotel use. Your officers consider this to be acceptable given that it is an existing hotel adjacent to the Town Centre boundary and within the Wembley Growth Area, and the proposal has demonstrated that it is an appropriate addition in terms of its visual design, massing, highway impacts and amenity impacts to neighbours.
2. **Design:** The design of the building is considered to be acceptable and the height and massing is in keeping with the local context.
3. **Neighbouring amenity:** The relationship with most neighbouring buildings complies with relevant Brent guidance for protecting visual amenity. Situations where guidance is breached are very minor in nature. The applicant's daylight and sunlight analysis confirms that whilst some small losses of light will be experienced, all nearby properties will retain suitable daylight and sunlight to their windows in line with BRE standards.
4. **Highways and transportation:** The submission demonstrates that the proposal is unlikely to have a significant impact on local street given the high level of public transport accessibility of the site.
5. **Environmental considerations:** A number of conditions are recommended regarding the potential will require the environmental health impacts, in particular construction management, to be fully considered and mitigated prior to commencement of the development.
6. **Trees, landscaping and public realm:** The proposal will deliver new street trees outside the development as part of a S106 contribution, which is strongly supported by your officers. Railing planting will mask the light well and make for a positive street frontage relationship.
7. **Sustainability and energy:** The measures proposed by the applicant achieve the required improvements on carbon savings within London Plan policy. This includes on-site measures and contributions towards carbon off-setting which would be secured through the Section 106 legal agreement.

MONITORING

The table(s) below indicate the existing and proposed uses at the site and their respective floorspace and a breakdown of any dwellings proposed at the site.

Floorspace Breakdown

Primary Use	Existing	Retained	Lost	New	Net Gain (sqm)
Assembly and leisure	0		0	0	
Businesses / research and development	0		0	0	
Businesses and light industry	0		0	0	
Businesses and offices	0		0	0	
Drinking establishments (2004)	0		0	0	
Financial and professional services	0		0	0	
General industrial	0		0	0	
Hot food take away (2004)	0		0	0	
Hotels	1220		1220	4967	
Non-residential institutions	0		0	0	
Residential institutions	0		0	0	
Restaurants and cafes	0		0	0	
Shops	0		0	0	
Storage and distribution	0		0	0	

Monitoring Residential Breakdown

Description	1Bed	2Bed	3Bed	4Bed	5Bed	6Bed	7Bed	8Bed	Unk	Total
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RELEVANT SITE HISTORY

No relevant planning history.

CONSULTATIONS

Letters sent initially on 25th July 2017, with re-consultation letters with a revised description sent on 5 October. Revised site notices were put up on 5 October and a revised advertisement in the press on 12 October.

329 letters were sent to adjoining and nearby owners and occupiers.
Four letters of objection were received.

The grounds of objection are listed below:

Grounds of Objection	Officer Response
<p>A commercial re-development with increased occupancy will result in additional noise and nuisance and make the area less residential.</p> <p>The area will become busier and security and safety will be a major concern with an additional influx of temporary visitors.</p>	<p>The principle use of this land will not change, with the established hotel use remaining. The local area is on the periphery of one of Brent's major town centres and Elm Road itself is within the designated centre. Whilst the residential aspects of the area are acknowledged, it is considered that the area is also commercial and that a hotel use has and continues to be appropriate in such a location.</p> <p>Whilst the proposed aparthotel will accommodate increased occupancy, all primary and ancillary uses (aside from taxi-drop off) associated with the hotel are to take place within the building, where disturbance to external premises will be minimised. It is also noted that the proposed</p>

	<p>hotel does not include provision for an outdoor seating area, as is the case with the current hotel – this could significantly reduce instances of noise disturbance from guests.</p>
<p>Additional visitors will create major parking issues, especially during Wembley Stadium Event Days. This will cause additional congestion on Elm Road, which already has a shared/single lane for traffic in both directions. Additional traffic could be experienced 24 hours a day.</p>	<p>This is discussed in detail within Section 7 of the report.</p> <p>No on-site parking is proposed, which is acceptable given the excellent local access to public transport (train services within 200m and numerous bus routes within 100m). The site is also near to existing public car parks (e.g. St John's Road, Elm Road or Wembley Central car parks) and there is a CPZ in operation in the local area.</p>
<p>Additional floors will lead to windows facing residential flats leading to a loss of privacy and distraction.</p>	<p>Potential amenity impact is discussed in detail in section 5 of the report. This sets out that the proposal will not lead to an unduly unacceptable loss of privacy (having regard to SPG17 and draft SPD1) providing a condition is attached regarding obscured glazing for certain windows.</p>
<p>There will be a loss of view and the additional floors/built form would be out of character with the surrounding residential houses and flats.</p>	<p>There are no protected views which would be detrimentally affected by this development.</p> <p>It is considered that the design is sympathetic to its surroundings, with the largest massing (4/5 storeys) only provided centrally on the corner, away from the neighbouring houses. The approach to the architecture is modern compared to the neighbouring immediate, but assuming the quality of materials will be high, it is considered that the new building will add value and variety to the streetscene without detracting from the standalone character of its neighbours.</p> <p>The established context on the south side of Elm Road is already comprised of similarly orthogonal and modern buildings of a greater height, which would provide an additional rationale for supporting a design of this nature.</p>
<p>It is alarming when groups of guests speak or shout loudly in front of the hotel, or eat and drink at the road side seating during late nights or early mornings. The concern is even greater during event days and weekends when local residents are resting.</p>	<p>Whilst the proposed aparthotel will accommodate increased occupancy, all primary and ancillary uses (aside from taxi-drop off) associated with the hotel are to take place within the building, where disturbance to external premises will be minimised. It is also noted that the proposed hotel does not include provision for an outdoor seating area, as is the case with the current hotel – this could significantly reduce instances of noise disturbance from guests.</p>
<p>An all-night array of LED lights forming the hotel displays are a nuisance, forcing those opposite to close their curtains earlier. Such environmental concerns are likely to increase with a new 128 bed hotel.</p>	<p>All advertisements and signage need advertisement consent, as issued by the Local Planning Authority, before they can be lawfully erected. The applicants will need to secure such consent separately for any signage, including LED signage. The Local Planning Authority will consider the luminosity of</p>

	signage to ensure that any signage is unlikely to disturb neighbouring residents.
Late night rooftop parties and groups in the terraced areas with alcohol disturb otherwise peaceful living conditions which may increase with a larger hotel.	There is no rooftop access for guests proposed nor are balconies or terraces proposed. All lounge and restaurant spaces are internal to the building and it is considered that the aparthotel's design will minimise the potential for noise disturbance, particularly in comparison to the current hotel, where a substantial external seating area exists.
The 5 storey hotel is overdevelopment and unnecessary, where other hotels are nearby, such as a large Travelodge which is situated about 200m away, next to Wembley Central station.	There is no planning policy that limits the number of hotels in this area. It is up to the owner to consider if suitable demand exists for the proposed aparthotel. In planning terms, the hotel use is appropriate and in compliance with local planning policies and it is therefore not considered that the development should be resisted.

Internal Consultees

Environmental Health: No objection to the proposal subject to conditions. Please see Environmental Health discussion below for further details.

Landscape Design/Trees: No objection to the proposal subject to Section 106 obligations. Please see tree discussion below for further details.

Local Lead Flood Authority: No objection to the proposal subject to conditions. Please see discussion below for further details.

External Consultees

Thames Water: No objection subject to conditions and informatives. Please see discussion below for further details.

POLICY CONSIDERATIONS

NATIONAL

National Planning Policy Framework

REGIONAL

Further alterations to the London Plan (consolidated with alterations since 2011)

LOCAL

Brent Local Development Framework Core Strategy 2010

CP1 Spatial Development Strategy

CP5 Placemaking

CP7 Wembley Growth Area

Brent Development Management Policies 2016

DMP 1 –Development Management General Policy

DMP 6 – Visitor Accommodation and Attractions

DMP 11 – Forming an Access on to a Road

DMP 12 – Parking

Wembley Area Action Plan 2015

WEM1 Urban Form

WEM15 Car Parking Standards

WEM16 Walking and Cycling

WEM30 Decentralised Energy

Brent Council Supplementary Planning Guidance and Documents

SPG17 Design Guide for New Development 2001

SPG5 Altering and Extending your Home 2002

Draft SPD1 Design Guide for New Development 2017

Draft SPD2 Altering and Extending your home 2017

DETAILED CONSIDERATIONS

1.0 Principle of use

1.1 There is no objection to the principle of redeveloping the existing hotel for a new hotel facility. No change of use will occur.

1.2 The use of the site would intensify as a result of the proposed development, with an increase from the 61 bedroom hotel to a 128 bedroom aparthotel. Given the excellent public transport accessibility level (PTAL) of 6 and the location being immediately adjacent to a major town centre, it would not be considered that the intensification of the use would reflect an overdevelopment, subject to demonstration that the proposal is acceptable on visual design, massing, highways and amenity impact grounds.

1.3 The hotel will include a substantial four level basement. There is no objection in principle to the excavation and use of basement levels, however it is important to carefully consider whether the aparthotel would become overly reliant on basement floor space for its primary functions, as this could represent an unacceptable intensification of use which would not appropriately reflect the capacity of the site. However, only 20% (26 out of 102) of the aparthotel's bedrooms will be located within the basement which is considered to reflect an acceptable auxiliary use of the basement rather than a primary reliance on it. To improve the outlook to basement rooms, they have been configured as duplexes, providing two windows across two basement levels rather than the single window within other rooms of the aparthotel. When the overall floor space of primary aparthotel accommodation is considered, 36% of the bedroom floor space will be contained within the basements. Whilst not insignificant, it is not considered that this floor space proportion is substantial enough to justify objection to the proposal and it is reiterated that around two thirds of bedroom floor space and 80% of overall bedrooms will be provided within the ground and upper floor accommodations. The basement will also contain other ancillary functions of the building, including plant, a restaurant for the use of guests and a leisure centre including gym and swimming pool. Since these represent ancillary functions of the aparthotel, they are accepted as suitable uses of the basement.

1.4 The principle of acceptable hotel or aparthotel accommodation relies on assurance that the aparthotel will not be occupied by permanent residents, in accordance with the requirements of policy DMP 6. A condition will be applied to require this.

2.0 Scale, Design and Massing

2.1 Design is an important consideration, and buildings need to be high quality. This is promoted by policy 7.6 of the London Plan, CP6 and CP8 of the Core Strategy.

2.2 The site is not within or close to a conservation area and does not contain listed buildings. The proposal would result in the loss of the existing Edwardian terraced buildings, 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 solution being provided in its place.

2.3 The proposal is for an orthogonal building to replace the five terrace houses, whose massing would range

from 3 storeys on the northern and eastern sides to 4 and 5 storeys on the central and southwestern sides of the building, at the central part of the corner plot. The 3 storey parts of the building would accord with the height of the surrounding buildings, including the terraces along Elm Road (9.7m high), whilst the higher central section would increase the height by an additional 5.5m resulting in a prominent building in relation to its immediate neighbours. Given the corner plot location, it is considered that this is an acceptable arrangement which would not detract from the established character of the shortened, but otherwise unaffected, row of terrace houses to the east.

2.4 The buildings on the south side of Elm Road include the Job Centre, which is a flat roofed 3 storey building immediately across from the hotel and the adjoining block of flats at 10 and 12 Elm Road, which reaches a height of 5 storeys, with a set in sixth. Unlike the hotel, these buildings are within the Wembley Town Centre boundary and result in an urban context along Elm Road when compared to the surrounding residential roads. Whilst the hotel is marginally outside of the town centre boundary, the use of the building as a hotel is already established and it is considered that the denser, urban character proposed would respond to the immediate context across the road junction well, whilst being limited enough in height to minimise disturbance of the suburban residential character that prevails to the north of the site. The proposal is therefore considered to be a comfortable addition in terms of general massing, given its surrounding context on the south side of Elm Road.

2.5 The building has been designed to follow the established front building line of Elm Road. The building will have a clean straight façade but will have variation in heights (as detailed above) which creates different volumes on the upper floors, breaking down the massing of the building. The building is also articulated through variations in façade treatment, with red brick being used on lower flower floors and white brick being used on the upper most floors to give a lighter-weight appearance to the tallest parts of the building. Tall window openings framed in PPC aluminium are to repeat frequently along the façade and are to be arranged in clean stacks up the building to provide a strong vertical emphasis. A larger gap between windows is to be articulated with brickwork inset panels to provide some additional interest within the frontage. By virtue of the significant headroom height within the servicing entrance, some the windows on the northern part of the building fronting St John's Road will not align with their adjacent windows – this results in a break in design rhythm. However, the architects have sought to differentiate this particular section of the façade by using white brick entirely and providing additional sections of brickwork detailing panels to achieve an appropriate and deliberate variation in the design.

2.6 The building will be fronted at ground level by metal railings with landscaping planters along the base of the railings. The railings will be placed 2m in front of the edge of the building itself. The established window rhythms along the visible façade extend downward into a light well. The light well provides some of the basement's light source and also provides defensible space for the bedrooms whose windows face out onto the street at ground floor level, however the light well has the potential to result in an awkward relationship between the building and the street. The planters within the railings will help to screen this relationship from view and contributions to be made to street tree planting (see section 10.0 below) will provide further environmental mitigation which will work to mask the visibility of the light well from the street. The guest entrance to the hotel is located centrally, on the corner of the building. It is a prominent entrance which makes use of tall glazed panels to provide additional activation and improve the relationship with the street. The northern edge of the building, along St Johns Road, is to be equipped with a large sliding vehicular entrance door comprised of a PPC aluminium roller shutter. The entrance is 4.5m high, which will allow deliveries and collections from the largest vehicles.

2.7 The building is to occupy most of the plot and will not include the 10m space buffers which would normally be required to preserve outlook to neighbouring development sites. Nonetheless, two of the elevations (south and west) are highway facing whilst the other two (north and east) do not provide any forms of outlook. As such, the development is not relying on another land parcel to achieve outlook.

2.8 Overall, the building's design and appearance is considered acceptable. The building would be notably larger than its immediate surroundings but the focus of it on the main road junction, and the light materials as well as the similarly tall established buildings across the road are considered to fully justify the building design proposed.

3.0 Hotel Layout

3.1 The proposed aparthotel includes 128 rooms overall with various ancillary rooms and functions. Behind the entrance at street level, guests proceed down a short flight of stairs to the lower ground floor where the reception and guest lounge is located. A disabled lift to reach the LG floor as well as a general lift for access to the leisure centre and restaurant will be provided immediately within the entrance. From the main reception

area there is access to a large 'back of house' area with laundry rooms and admin offices. Access is also possible to the internal service bay and delivery/storage/refuse area on the north side of the LG floor. Finally, corridor access to nine of the aparthotel rooms located on this floor is possible. From these corridors it is also possible to access the main guest stairwell and two guest lifts for access to other floors.

3.2 The upper ground floor occupies a similar footprint to the lower ground, however the north eastern section of the building tapers in to protect the rear garden amenities of no. 13 Elm Road, resulting in a slightly smaller floor. This floor provides access to 21 of the aparthotel rooms and includes small laundry rooms for the ease of servicing rooms.

3.4 The first floor occupies the same footprint as the upper ground floor and provides access to 25 of the aparthotel rooms. Two small laundry rooms are provided amongst the rooms for the ease of servicing rooms.

3.5 The second floor tapers in further on the north eastern corner to provide further mitigation of amenity impact on no. 13 Elm Road. The footprint therefore reduces in size again. Access to 22 of the aparthotel rooms is made from this floor.

3.6 The third floor sees substantial reductions in footprint as more of the north-eastern corner is reduced as well as the northern and eastern extremities of the façade; this retains a smaller central section forming the high level part of the building. The floor provides access to 15 of the aparthotel rooms, and one laundry room is provided centrally.

3.7 The fourth (and top) has the smallest footprint, occupying just the central section of the main building footprint. Access to 10 of the aparthotel rooms is on this floor along with one laundry room.

3.8 Basement level one provides access to the subterranean duplex rooms. 26 such rooms are accessed from this floor and these represent the only aparthotel accommodation within basement levels. Basement level two does not have any publicly accessible areas as they serve the lower levels of the 26 duplex rooms, which are only accessible from the upper floor. Nonetheless, staff staircases do allow access to this floor, where some area of plant/storage and a laundry room are present. Basement level three includes a restaurant and leisure centre, with two changing rooms, a gym, swimming pool and reception/admin rooms. The restaurant and part of the leisure centre are provided with natural light from above, as they form the bottom level of each light well along the edge of the building. This floor is accessible from the lift near to the ground floor entrance. Finally, a fourth basement level occupies a small section of floor space under basement level 3. The edge light wells do not extend down to this floor and no natural light is provided. The floor provides space for additional plant – no guest accessible space is to be provided on this floor and staff would only need to enter for maintenance purposes..

3.9 A key feature of the internal layout is a central light well, which is approximately 7m x 9m in size, which allows light into the rear parts of the hotel. The light well provides light to all floors of the hotel running from the roof of the building down to basement level 3. From the upper ground floor to the fourth floor, as well as on basement levels 1 and 2, the light well provides light and outlook to bedrooms. On the lower ground floor, the light well provides light and outlook to the large 'back of house' space. On basement level 3, the light well terminates at ground level, providing an accessible landscaped courtyard space, which can be accessed from the swimming pool and gym areas.

4.0 Restaurant and Leisure Facilities

4.1 The proposal includes a restaurant and small leisure centre (including a gym, swimming pool and changing rooms) on the third basement level. The restaurant will be provided with some natural light as it sits at the bottom of the light well running along the Elm Road elevation. The leisure centre will be provided some natural light as they open onto the central courtyard at the base of the central light well. Whilst your officers would prefer such uses to have greater direct visual interaction with the adjoining streets (for the benefit of the street), there is no objection to the proposed location of the restaurant and leisure offer. It is noted that the street frontages are already activated to a reasonable extent by the ground level windows to aparthotel rooms.

4.2 The application identifies a riser to extract odours from the restaurant within an enclosed area alongside the main lifts – this will not be in close proximity to any of the bedrooms. Environmental Health have commented that this has the potential to result in nuisance caused by noise or odour and has recommended that a condition is attached requiring further details (see section 8.0 below).

4.3 The floor plan layouts show that a lift to the restaurant/leisure facilities will be provided immediately inside the aparthotel's entrance, which could easily facilitate use of the restaurant by the general public. Given the location of the property on the edge of a town centre and the surrounding proximity of town centre retail uses (immediately next to the building along St John's Road and within 100m along High Road) it is not considered that the restaurant or leisure facilities need to be conditioned as ancillary to the aparthotel, given that such uses in isolation would likely be acceptable in this location. Therefore, the use of the restaurant and leisure facilities by members of the public would not be resisted, particularly in view of the subterranean nature of the hotel and its associated lack of likelihood to result in noise disturbance. This is likely to alleviate concerns of noise disturbance which have been raised by objectors.

5.0 Amenity Impact

5.1 The Council's SPG17 and draft SPD1 guidance includes parameters for suitable impact on the amenity of neighbouring occupiers. The western and southern edges of the development border with the public highway and will therefore not affect private amenity spaces. The building's northern edge sits along the boundary with 10-12 St John's Road. This site accommodates a church. Whilst the development will impose a large built form of three storeys directly alongside the southern boundary of the site, the aparthotel has been designed without north elevation windows and the aparthotel will not rely on the outlook of the neighbouring church site. Given the lack of residential uses on the adjoining site, it is not considered that the presence of the new hotel building will incur an unduly detrimental impact on the church site.

5.2 Residential properties along St John's Close adjoin the church site to the north. St John's Close tapers in to the south, to the point where the back edge of the garden at no. 4 St John's Close comes within 4m of the proposed north-eastern corner of the aparthotel. For the extent of no. 4 St John's Gardens width, the aparthotel has a reduced massing (one storey only on the far eastern edge and two storeys further west). When applying SPG17's degree rule guidance, this property passes the tests by virtue of the reduced massing directly behind the garden; this includes the 45 degree test, taken at a height of 2m from the back edge of the garden and the 30 degree test, taken at a height of 2m from the back edge of the dwellinghouse. The house adjacent to this (no. 3) which is the next closest at 9.5m from the edge of the aparthotel building, passes the 30 and 45 degree tests for the entirety of the building.

5.3 The most sensitive adjoining relationship is with no. 13 Elm Road to the east. The applicants have designed the building so as to reasonably reduce the impact to the view from the rear windows and rear garden of this property. The building does not extend alongside the garden immediately against the boundary, except below a height of 2m on the lower ground floor. The upper ground floor and first floor are set in from the eastern boundary to soften the impact with the neighbouring property. This includes a 1.4m set in from the boundary for the first 1.7m of the garden depth, which then steps out to a 3.25m set in, which then continually splays away from the boundary to a maximum set in of 5.3m from the boundary at the rear edge of the neighbouring garden. The second floor is set in by 6.5m from the boundary and has a wall which splays away from the garden boundary to 8.9m by the rear edge of the neighbouring garden. The third and fourth floors are set in substantially from the shared boundary with no. 13 (by more than 18m). The development complies with SPG5's 1:2 guidance for the first 2.75m of projection depth beyond the rear wall of the neighbouring property. The Design and Access statement also demonstrates the development's 45 degree relationship with the garden (as measured by drawing a 45 degree line from the shared boundary towards the development at a height of 2m, as seen from a rear elevation). The development does not fall entirely underneath the line until the rearmost part of the garden, however all breaches of the line are only marginal: generally only parapets breach the line. Whilst there will be an acknowledged loss of light and amenity to the garden of no. 13 Elm Road and the nearest houses further to the east it is not considered that these will be unduly detrimental given the small scale breaches of guidance in the context of the large scale of this development. It is also acknowledged that the applicant has made significant design concessions to soften the impact on the neighbouring properties.

5.4 The upper ground, first and third floors will all have east facing windows that would allow overlooking of the private garden space at the rear of the properties to the east. A condition will require that these windows are obscure glazed and non-opening at low level in respect of the upper ground and first floors, however the third floor is sufficiently set back from the boundary with no. 13 Elm Road (>18m) to alleviate concerns that privacy of residents may be compromised. Furthermore, at this height, it is unlikely that hotel guests will have a direct line of sight to the nearest garden spaces given the expanse of roof that is between the windows and the garden.

5.5 The relationship on the south and west elevations is less sensitive given the wide expanse of highway separating the hotel from existing properties. Nonetheless, the applicants have shown 30 degree line relationships between the lowest front facing windows and the development to demonstrate compliance with

SPG17 guidelines in relation to overbearing impact. The development sits under the 30 degree line when measured from the lowest windows of the nearest properties along St John's Road and Elm Road. This also takes account of the taller central elements of the building.

5.6 Where developments do not fully comply with SPG17 guidelines (as is the case with the relationship on the east boundary), it is often requested that applicants provide a professional daylight and sunlight analysis of surrounding properties to consider whether any nearby properties will be unduly affected in accordance with established BRE criteria. The applicant has provided a daylight and sunlight analysis in accordance with BRE standards. The full report is available for viewing on the Council's website and it is ultimately concluded that none of the affected properties will be affected to the point where any nearby windows fail the relevant BRE standards. Perhaps most critically, the two rear facing windows within no. 13 Elm Roads outrigger projection and two side facing windows within no. 15 Elm Roads outrigger projection will all retain a Vertical Sky Component (VSC) of at least 80% of their existing value, thus meeting BRE criteria. The overall results of the Daylight and Sunlight survey are considered to be positive, particularly given the relatively dense, town centre fringe location.

6.0 Internal Accommodation

6.1 The Council does not have policies regarding the quality of hotel or aparthotel rooms. However, the layouts proposed appear to be typical of such uses. The use of duplex rooms for the basement will have two sources of light and outlook to offset the lack of views across the street. The use of a central light well with a landscaped base will also provide a source of light and outlook to the centrally located bedrooms. The plans include details of kitchen ventilation within a riser and an extract at roof level. Kitchen odours will rise within a closed chamber adjacent to the main lift shafts and away from hotel rooms.

6.2 Inclusive access is to be integral to the design of the hotel. London Plan policy 4.5 requires at least 10% of hotel rooms to be wheelchair accessible and the aparthotel will provide 13 such rooms (10.2%) to achieve this requirement. The floorplans confirm that the accessible bedrooms are those which are closest to the lift accesses and are shown to include appropriate wheelchair turning spaces within bedrooms and their en-suites. None of the accessible bedrooms are to be subterranean or duplex in design and will all be contained within the Ground and above floors. In accordance with Brent Policy DMP6, the application has been accompanied by an Accessibility Management Plan (AMP) within the D&S statement to demonstrate that the management and operation of accessible rooms is integral to the hotel's design. The AMP confirms that accessibility and inclusion will be monitored throughout the life of the development and that revisions will be made post-planning to reflect the operators operational and management policies.

6.3 Elements of inclusive access as detailed within the AMP include:

- Taxi drop off meet and greet service for disabled guests
- Proximity of local car parks for blue badge parking for disabled visitors
- Step free access from street to the hotel reception, lounge, restaurant, leisure facilities and all 13 accessible rooms
- Wide corridors (at least 1500mm)
- Lift lobbies with turning spaces of at least 1800mm x 1800mm
- Accessible aparthotel rooms to meet or exceed minimum requirements and provisions of ADM for sleeping accommodation – according with AD M and BS 8300, providing suitable circulation and manoeuvring space and suitable storage and alarm systems
- Additional equipment to assist disabled guests which will be reviewed throughout lifetime – to include vibrating fire pillow pads for guests with hearing impairments, toilet seat risers, mobile hoists
- Emergency egress procedures for disabled people, including staff training in such procedures
- Staff training in disability equality issues and the use of equipment
- Where possible, the registering of disabled guests needs ahead of arrival and consideration of individual needs throughout each stay
- Re-drafting of the AMP following occupation and continual monitoring and review on a quarterly basis
- Appointment of a member of staff as an accessibility coordinator to monitor customer feedback and improving, monitoring, allocating and managing aspects of disabled access and adaptability
- Adherence to accessible design principles in respect of legibility of environment, circulation, door clearances and widths, step-free alternative provision in all instances, handrail standards and stepped route standards with visually contrasting nosings, passenger lift standards
- Lighting and internal finishes to be designed in the interests of improving ease of use for those with disabilities
- Clearly legible wayfinding and signage and slip resistant flooring

6.4 The AMP is considered to be thorough and it will be necessary for the aparthotel to operate in strict accordance with the AMP for the development to be acceptable.

7.0 Transport

7.1 The scale of this proposal is such that it could have an impact on local transport networks. A Transport Statement and Travel Plan have therefore been prepared by RGP Consultants and submitted to quantify and then mitigate any impact.

7.2 In terms of car parking, whilst the site lies within the Wembley Area Action Plan zone, there are no separate parking standards for hotels set out in that document. The standards set out in Appendix 1 of the adopted DMP therefore apply and these allow only disabled and operational parking to be provided for hotels with good access to public transport services. The absence of any proposed parking for the hotel therefore accords with standards.

7.3 Disabled Blue Badge holders would be able to use nearby on- and off-street parking bays in the area. The operation of a CPZ in the area would deter car-borne guests from parking in nearby residential streets and encourage them to use nearby public off-street car parks in the area instead, such as St. John's Road, Elm Road or Wembley Central car parks. The excellent access to public transport services should also help to minimise car trips to the site.

7.4 One coach parking space should also be provided for every 50 bedrooms, giving a requirement for two spaces for this new hotel. However, the proposal is for an apart-hotel, which includes larger rooms with cooking facilities intended to attract longer-stay customers, such as families (26 duplex apartments for family sized groups are proposed) or long-stay business trips.

7.5 The applicant states that such visitors are less likely to be arriving in large groups by coach. There is little data on the TRICS national database on apart-hotels, but a review of other apart-hotels in London by Brent's Transport officers suggests that there is very little, if any, demand for coach parking for such businesses.

7.6 A coach management strategy has also been submitted setting out the policy towards coach bookings (i.e. they will not be accepted and any web-based booking system will limit guest numbers for group bookings). In the unlikely event that a coach does require parking for the hotel, staff will direct them to alternative locations in the area. This is not ideal, as the coach would still wish to stand at the site when dropping off and collecting passengers, but it is noted that there would be sufficient space within the service yard to accommodate a coach if required, as long as this area is managed.

7.7 As such, the coach parking requirements can be relaxed, subject to the future operation and regular review of the submitted Coach Management Plan being secured by condition.

7.8 Taxis can also be expected to set down and collect visitors and a carriage driveway on the western side of the site is proposed for this purpose, accessed via two crossovers onto St. John's Road. The new and widened crossovers will need to be provided by the Highway & Infrastructure services at the developers expense, including the removal of guardrailing.

7.9 The London Plan requires three short-stay bicycle parking spaces for guests and seven long-stay spaces for staff. The proposed provision of four and nine spaces in suitable areas respectively is more than sufficient to satisfy requirements.

7.10 Servicing by 8m rigid vehicles is required for the hotel under the standards set out in Appendix 2 of the DMP and the provision of a service yard at the northern end of the building accessed from St. John's Road is sufficient to satisfy this requirement. Vehicles will be required to reverse into the service yard, which suits the fact that the width and height restrictions on St. John's Road to the north of the site mean that many delivery vehicles can only approach and leave the site from the south, so will need to turn within the service yard entrance. Tracking has been provided to demonstrate that the access arrangements can accommodate large refuse vehicles.

7.11 A Delivery & Servicing Management Plan has also been submitted with the application to help to manage future deliveries. Eight weekly deliveries are anticipated, with the largest being refuse collection vehicles, with three linen collections per week in box vans. These delivery vehicle movements will be pre-planned, with the aim of avoiding peak hours and ensuring that no more than one vehicle needs to use

the service yard at any time. These measures are welcomed.

7.12 Pedestrian access is proposed directly from the corner of St. John's Road and Elm Road, which is fine.

7.13 In terms of transport impact, existing trips to and from the site have been estimated through comparisons with three other hotels in outer London. This suggests that the hotel currently generates 7 two-way vehicle movements in the morning peak hour (8-9am) and 5 two-way movements in the evening peak hour (5-6pm).

7.14 A more robust assessment should ideally have been undertaken through surveys of the existing hotel though. Indeed, historical data is available from 1994 for the hotel, which suggests that with the recent and approved extensions, the existing hotel could be expected to generate 9 two-way vehicle movements in the am peak hour and 7 in the pm peak hour.

7.15 For the proposed apart-hotel, estimates of future trips have been based upon data from a block of serviced apartments in Glasgow. However, the use of just one site to obtain trip rates is not robust, particularly as serviced apartments do differ from an aparthotel, in that they are typically larger (i.e. two+ bedrooms rather than one), so would attract a different clientele to an aparthotel.

7.16 To provide a robust assessment, future trips should instead be assessed on the basis of data for hotels (or aparthotels, if reliable survey information can be obtained) or surveys of the existing site.

7.17 Nevertheless, growing up the 1994 survey data results for the site to 128 rooms would give an estimated two-way vehicular trip volume of 17 cars in the am peak hour and 14 cars in the pm peak hour, which represents a reasonable worst-case. Given the absence of parking within the site, these trips would be dispersed across nearby off-street car parks and on-street parking bays. As such, the impact of any predicted additional trips on any one junction or road link in the area is not considered likely to be significant enough to require any further analysis.

7.18 Nevertheless, to help to mitigate traffic impact, a "Framework" Travel Plan has been submitted for the hotel. However, as the development is very clearly defined and as an operator has been identified, there is no reason why some of the more ambiguous commitments cannot be firmed up within a "Final" Travel Plan.

7.19 The submitted plan sets out a range of measures to be implemented by a Travel Plan Co-ordinator for both staff and guests (travel information on notice boards, website etc., marketing and promotion, loans for cycle & season ticket purchase, promotion of car sharing, Car Clubs etc.), with the aim of achieving a 20% fall in the actual number of staff driving to the site, a 15% rise in staff walking/cycling to the site and a 10% rise for guests using public transport over 3-5 years. Progress towards meeting these targets will be monitored on an annual basis over five years.

7.20 The targets are not particularly well defined though in terms of actual figures and timeframes, partly because of the absence of any estimated baseline modal share figures. The Travel Plan has therefore failed the ATTrBuTE assessment and baseline modal share figures and better defined targets need to be provided accordingly.

7.21 It should also be mentioned that Car Clubs may not be particularly useful for guests unless they are already members of that particular Car Club, due to the need to provide a permanent UK address to enrol. Emphasis is also placed on achieving discounts for staff for public transport trips, but TfL's view is that discounts are factored into season ticket prices, so the emphasis should therefore be on ensuring staff are offered interest-free season ticket loans.

7.22 In conclusion, the likely transport impact of the proposed aparthotel is considered to be acceptable, subject to operation of the Coach Management Plan and a revised Travel Plan being secured by condition or legal agreement.

8.0 Environmental Health

8.1 The Council's Regulatory Services team have considered the proposals and the technical supporting reports.

8.2 Noise, Vibration and Insulation

The applicant has submitted a report which assesses the internal noise and vibration of the proposed aparthotel, given existing environmental conditions. The report concludes that the internal noise levels

demonstrated will not give rise to significant adverse effects on health and the quality of life of occupants of the development. This report has been reviewed separately by Brent's regulatory services who agree with the conclusions of the report.

Plant equipment will be required for the proposed building, which has the potential to result in noise and disturbance of surrounding sensitive uses. Details of plant equipment, including projected noise levels are accordingly recommended to be secured through condition.

In terms of vibration from rail sources, residential developments must be designed to ensure that there is low probability of adverse comment as per BS6472. Specifically, the following vibration levels (Vibration Dose Values; VDV) must not be exceeded due to the road, rail or industry. However, restrictions on vibration should not be required in this case due to the short duration of exposure to potential guests. The aparthotel would be restricted for short stays only and the main source of vibration would be the Chiltern railway line which is at least 70 metres away from the proposed development, and mainly out of sight.

In terms of ground borne vibration, a piling method statement is recommended to be secured by condition to evaluate potential impacts of ground borne vibration associated with the construction process and it is noted that this requirement is shared by Thames Water (see section 9.0 below).

8.3 Demolition and Construction

In line with other Major development proposals, it is recommended that a demolition and construction management statement is secured through condition to promote best practice in the construction in the interest of limiting noise, dust and other disturbance associated with development.

8.4 Vehicular Activity

Environmental Health have commented on the potential noise associated with construction traffic, and have questioned whether restrictions can be imposed on the hours upon which vehicles may access the site. Noisy construction works are restricted through Environmental Health legislation which generally acts to mitigate the potential impacts of noise associated with construction. A condition cannot control matters outside of the application site and could not restrict the hours that vehicles can use the adopted public highway.

8.5 Structure-borne Noise

The Council's Environmental Health Officers have questioned whether works to the structure of the proposed building could be undertaken in a two-hours on, two-hours off working pattern to reduce the noise and vibration associated with construction. This could not reasonably be required of a construction process as it would add significant cost to the development. It would also significantly extend the construction period resulting in a significantly greater level of impact on surrounding residents.

8.6 Kitchen Extract Systems

The proposal will include commercial kitchen facilities and as such, it is recommended that a condition is attached to ensure that suitable details of the kitchen extract are secured and implemented prior to the building's occupation to mitigate potential impacts associated with odour and noise.

8.7 Deliveries and Opening Hours

The subject site is accessed via residential streets and Environmental Health have questioned whether

conditions may be attached restricting the hours of servicing. However, servicing is to be undertaken within a dedicated internal servicing bay and recent TfL initiatives have promoted servicing outside of peak hours where traffic levels are less (and thus the servicing does not contribute excessively to road congestion or adverse air quality). As such, on balance it is considered beneficial to not restrict the hours of servicing.

9.0 Flooding and Drainage

9.1 Brent's Local Lead Flood Authority notes that very little information has been provided in relation to surface water discharge and how this will be managed. A statement has been made confirming storage will be provided, but there is no mention of any quantity. Nonetheless, the development is small and is within Flood Zone 1. There are no historical records of flooding affecting this area. A condition is recommended requiring the applicant to provide full drainage details and surface water management on site. Given the low risk of this area, it is considered appropriate to secure this through condition as it is not necessary for these to be assessed prior to the determination of this planning application.

9.2 Given the lack of information, Thames Water have not been able to determine the waste water infrastructure needs of the application. As such, a Grampian condition has been recommended requiring a drainage strategy detailing drainage works to be approved prior to commencement of development. The condition should also require that no discharge of foul or surface water from the site shall be accepted into the public system until the approved drainage works have been completed.

9.3 Thames Water advise Brent that no piling shall take place until a piling methodology statement containing appropriate detailing of depth, type, methodology, prevention measures for damage to sewerage infrastructure and the programme for works is submitted and approved by the Council, in communication with Thames Water. A condition will be attached to this effect.

9.4 Thames Water have advised Brent to advise the developer in respect of groundwater discharges to the public sewer, to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer, the use of a fat trap since catering is proposed as well as further advice on flow rates in respect of sewer discharge. This information will be communicated to the applicant through an informative.

10.0 Landscaping and Trees

10.1 Landscaping will be incorporated into two parts of the proposal, firstly along the proposed frontage where planters will be incorporated along the base of the light well railings. This will improve the appearance of the proposal whilst providing screening of the light well which will immediately abut the footway. Further details of the planting, including species and density will be required by condition to ensure the railing planters are likely to be effective in their improvement of visual amenity.

10.2 The second landscaping proposal is in the form of tree planting to the enclosed courtyard, at the base of the internal light well, at the basement level containing the restaurant and leisure offer. The Courtyard will be accessible to guests/restaurant users/leisure users and will be the central visible feature for suites located centrally in the aparthotel. The plans provide basic detail, indicating the planting of four small trees within the courtyard and confirmation of a 'landscaped' arrangement. The tree officer has indicated that it is likely to be difficult to cultivate trees in an enclosed light well within a deep basement. Nonetheless, considering that the landscaping will not be visible to the public and that there are no policies or guidance with which hotel accommodation can be assessed, it is not considered necessary to request further information on this aspect. It will therefore be left to the hotel management to consider appropriate courtyard landscaping.

10.3 A tree plan has been submitted by the applicant and has been reviewed by Brent's tree officer. The plan identifies existing tree locations in and around the site. It is shown that 11 low grade C and U trees are located around the northern and eastern edges of the site. A grade B Hornbeam and a grade C Alder tree front the development on the south side and are located within Council land on the public footway. Furthermore, a grade B sycamore tree is present to the north of the site forming part of the neighbouring property's backland. The arboricultural report submitted confirms that all 11 low grade trees will be removed. Most of these trees are not visible from the public realm and offer limited visual improvement at present. The report also confirms that the two Grade B trees as well as the publicly owned Cat C tree will be retained. Their retention will be assured through a tree protection plan which proposes to erect protective fencing around these two street trees. The report confirms that the protective fencing will be type BS grade tree protection fencing. The full tree survey and protection plan has been reviewed by Brent's tree officer and it is confirmed that the methodology and protection plan proposed are acceptable and that the protection plan should be secured by condition.

10.4 The applicants only own a thin strip of footway at the front of the development, with the remainder of the footway in public ownership. Brent's tree officer has requested a contribution of £10,000 to enable the planting and maintenance of 7 street trees in front of the hotel, within Council land. This is considered important in improving the landscaping amenity offer at the front of the hotel and to further mitigate any detriment imposed by the visibility of the basement light well. The payment of this contribution has been agreed with the applicant and will be secured through the S106 agreement.

11.0 Summary

11.1 The proposed development is considered to be acceptable for the reasons discussed above and your officers recommend that planning permission is granted

SUSTAINABILITY ASSESSMENT

The applicant has included Energy and Sustainability Statements to demonstrate their sustainability strategy. The two main considerations in respect of this development are the Mayor's requirements for carbon savings within Policy 5.9 of the London Plan and the BREEAM rating of the development. Both of these aspects are discussed in detail below. In addition to this, the applicant's reports include small sections where it is explained how land use, impacts on neighbours from demolition and construction, surface water flooding, biodiversity, reuse of buildings, daylight and sunlight impacts and micro-climate will be managed to ensure the development maximises its sustainability. The sustainability report also confirms that the water efficiency of the development is in line with recommended BREEAM targets, through the use of water efficiency fittings resulting in a reduced water consumption. The report also refers to materials and waste, whereby 100% of timber used will be sourced from accredited Forest Stewardship Council (FSC) sources of Programme for the Endorsement of Forestry Certification (PEFC) source. Product holding responsible sourcing certifications will be specified for the main building elements (walls, floors, roof).

Carbon Savings

Be Lean

The applicant proposes passive energy efficiency measures in the development through the enhancement of u-values, improvements in air tightness and insulation to reduce air infiltration and associated heat loss and reducing reliance on artificial lighting through the maximisation of natural light.

The applicant proposed active design measures in the form of high efficacy lighting, mechanical ventilation that includes heat recovery (MVHR), comfort cooling, controls and sensors to keep lights off in areas of infrequent use and to manage heating and cooling systems, monitoring equipment and systems to monitor energy use and adherence to the principles of the cooling hierarchy as specified within Policy 5.9 of the London Plan.

Following the implemented above measures, the building's regulated CO₂ emissions are shown to reduce by 8.2% (34.0 tonnes per annum).

Be Clean

Whilst no existing heat network is present, a decentralised communal heat and power (CHP) system is to be included within the development, which could connect to a district heat network at a later date.

The applicant has considered the likely daily heat demand profiles as well as how the heat demand is likely to fluctuate throughout the year so that the CHP will be equipped with a correctly sized engine that will allow it to operate efficiently. Information is included to demonstrate these considerations. Following studies, the applicants have selected a CHP system with a total thermal output of 182kW and an electrical output of 93kW to maximise carbon reductions.

The CHP will achieve substantial carbon savings for the development, with regulated CO₂ emissions reducing by 32.3% (134.1 tonnes per annum) as a result of this. This accounts for about 80% of the CO₂ reductions proposed across the whole site.

Following the application of be clean and be lean measures, the carbon reductions reduce from the baseline total regulated emissions of 415.5 tonnes CO₂ per annum to 247.4 tonnes CO₂ per annum. This represents a saving of 168.1 tonnes CO₂ per annum, or 40.5% over the baseline Building Regulations standards as specified within Part L of the 2013 regulations.

Be Green

The applicant has considered the addition of renewable technologies to the aparthotel. The following were considered:

- Biomass
- Ground/water source heat pumps
- Air source heat pumps
- Wind energy
- PV panels
- Solar thermal panels

The applicant's energy statement has rated the feasibility of each on grounds of their length of effectiveness, maintenance and impact on external appearance. Whilst some technologies would be feasible for the development, the applicant notes that there is not a need for inclusion of any specific renewable technologies as the development is already exceeding the London Plan target via the incorporation of Lean and Clean measures.

The Mayor's Policy requires that a minimum 35% reduction in carbon emissions compared to the 2013 building regulations is achieved through sustainable measures. The achievement of 40% reductions is therefore in excess of the minimum standard. Whilst renewable technologies would be welcomed, it is also accepted that the building achieves the minimum standard in this respect. The Mayor's policy requires all remaining carbon emissions (247.4 tonnes/annum) to be accounted for through a carbon offset payment equivalent to £60/tonne for a period of 30 years. The Carbon Offset payment in this instance would therefore equate to £445,320. The contribution will be secured within a S106 agreement.

BREEAM

A BREEAM pre-assessment has been carried out and indicates that the development is capable of achieving an 'Excellent' rating (72.52%) which is welcomed. A condition is however recommended that requires the applicant to submit a Design Stage BRE Interim Certificate to achieve this rating and also Post Construction Stage Review BRE Certificate demonstrating that the Development has achieved BREEAM 'Excellent'.

CIL DETAILS

This application is liable to pay **£868,756.27*** under the Community Infrastructure Levy (CIL).

We calculated this figure from the following information:

Total amount of eligible** floorspace which on completion is to be demolished (E): sq. m.

Total amount of floorspace on completion (G): 6336 sq. m.

Use	Floorspace on completion (Gr)	Eligible* retained floorspace (Kr)	Net area chargeable at rate R (A)	Rate R: Brent multiplier used	Rate R: Mayoral multiplier used	Brent sub-total	Mayoral sub-total
Hotels	6336	1230	5106	£100.00	£35.15	£642,808.93	£225,947.34

BCIS figure for year in which the charging schedule took effect (Ic)	224	224
BCIS figure for year in which the planning permission was granted (Ip)	282	
Total chargeable amount	£642,808.93	£225,947.34

*All figures are calculated using the formula under Regulation 40(6) and all figures are subject to index linking as per Regulation 40(5). The index linking will be reviewed when a Demand Notice is issued.

****Eligible** means the building contains a part that has been in lawful use for a continuous period of at least six months within the period of three years ending on the day planning permission first permits the chargeable development.

Please Note : CIL liability is calculated at the time at which planning permission first permits

development. As such, the CIL liability specified within this report is based on current levels of indexation and is provided for indicative purposes only. It also does not take account of development that may benefit from relief, such as Affordable Housing.

DRAFT DECISION NOTICE



Brent

DRAFT NOTICE

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

DECISION NOTICE – APPROVAL

Application No: 17/3188

To: Miss Jones
GVA
G V A Grimley Ltd
65 Gresham Street
LONDON
EC2V 7NQ

I refer to your application dated **17/07/2017** proposing the following:

Demolition of existing hotel buildings and erection of a part 3, part 4 and part 5 storey 128 bed aparthotel plus basement accommodation comprising guestrooms and ancillary facilities within a 4-storey basement (situated below the part-basement lower ground floor), together with soft and hard landscaping, servicing, cycle storage and refuse and recycling facilities (revised description)

and accompanied by plans or documents listed here:
Refer to condition 2.

at **1-7, 9, 11 & 11A Elm Road, Wembley, HA9 7JA**

The Council of the London Borough of Brent, the Local Planning Authority, hereby **GRANT** permission for the reasons and subject to the conditions set out on the attached Schedule B.

Date: 02/11/2017

Signature:

Alice Lester
Head of Planning, Transport and Licensing

Notes

1. Your attention is drawn to Schedule A of this notice which sets out the rights of applicants who are aggrieved by the decisions of the Local Planning Authority.
2. This decision does not purport to convey any approval or consent which may be required under the Building Regulations or under any enactment other than the Town and Country Planning Act 1990.

DnStdG

SUMMARY OF REASONS FOR APPROVAL

- 1 The proposed development is in general accordance with policies contained in the:-

National Planning Policy Framework 2012
London Plan 2015
Brent Core Strategy 2010
Brent Development Management Policies 2016
Council's Supplementary Planning Guidance 5 2002
Council's Supplementary Planning Guidance 17 2001

- 1 The development to which this permission relates must be begun not later than the expiration of three years beginning on the date of this permission.

Reason: To conform with the requirements of Section 91 of the Town and Country Planning Act 1990.

- 2 The development hereby permitted shall be carried out in accordance with the following approved drawing(s) and/or document(s):

A-000-001 Rev P0

A-025-001 Rev P0
A-025-002 Rev P0
A-025-003 Rev P0
A-025-110 Rev P0
A-025-111 Rev P0

A-100-002 Rev P0 (Proposed Lower Ground Floor Plan)
A-100-002 Rev P0 (Upper Ground Floor Plan)
A-100-003 Rev P0
A-100-004 Rev P0
A-100-005 Rev P0
A-100-006 Rev P0
A-100-007 Rev P0
A-100-010 Rev P0
A-100-011 Rev P0
A-100-012 Rev P0

A-110-001 Rev P0
A-110-002 Rev P0

A-120-001 Rev P0

Reason: For the avoidance of doubt and in the interests of proper planning.

- 3 No guest or customer of the aparthotel hereby permitted may occupy any part of the accommodation for a period exceeding ninety days in any continuous period of six months. The operator of the hotel shall at all times maintain an accurate register of the full names and permanent addresses of all guests and of the dates of their occupancy of the accommodation. These registers shall be kept for not less than two years from the date of the last entry and shall be made available to be inspected by the Local Planning Authority upon reasonable demand.

Reason: To ensure the development provides an adequate standard of accommodation for guests and fulfils the role of temporary (hotel) accommodation, as required by policy DMP6.

- 4 The premises shall not be used other than for the purpose of apart-hotel and for no other purpose (including any other purpose in Use Class C1 specified in the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification) without the prior written permission of the Local Planning Authority with the exception of the ancillary use of the areas as shown in the drawings hereby approved as a restaurant and gym/swimming pool/changing facilities which may be used for those purposes.

Reason: To ensure that no other use commences without the prior permission of the Local Planning Authority and to enable other uses to be considered on their merits.

- 5 The windows on the upper ground and first floors of the eastern face of the building shall be constructed with obscure glazing and non-opening or with openings at high level only (not less than 1.8m above floor level) and shall be permanently returned and maintained in that condition thereafter unless the prior written consent of the Local Planning Authority is obtained.

Reason: To minimise interference with the privacy of the adjoining occupier(s).

- 6 The 13 aparthotel rooms which are Wheelchair Accessible shall be maintained with this level of accessibility throughout the lifetime of the development, unless an alternative arrangement is first agreed in writing by the Local Planning Authority.

Reason: To ensure a sufficiently accessible development that complies with the London Plan 2011 and Brent Policy DMP6.

- 7 All provisions and details contained within the Accessibility Management Plan contained within the submitted Design and Access Statement shall be implemented from first occupation of the development hereby approved and shall thereafter be implemented and adhered to throughout the lifetime of the development, unless an alternative arrangement is first submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure a sufficiently accessible development that complies with the London Plan 2011 and Brent Policy DMP6.

- 8 The development shall not be occupied unless the coach and servicing area has been provided and is available for use and the details contained within the Coach Management Plan and Delivery and Servicing Management Plan hereby approved shall be fully implemented from first occupation and and adhered to in full throughout the lifetime of the development.

Reason: To ensure that the development will not prejudice the safe and free flow of vehicles along the highways

- 9 The development hereby approved shall not be occupied unless the two proposed crossovers along St John's Road have been constructed in accordance with the plans hereby approved.

Reason: To ensure that the development is fit for purpose and will not prejudice the safe and free flow of vehicles along the highways

- 10 The developer or constructor shall join the Considerate Constructors Scheme prior to commencement of works and the developer or constructor shall thereafter adhere to the requirements of the Scheme for the period of construction.

Reason: In the interest of the amenities of the adjoining and nearby owners and occupiers.

- 11 The approved cycle storage facilities shall be installed prior to first occupation of the

development hereby approved and thereafter retained and maintained for the life of the development and not used other than for purposes ancillary to the occupation of the apart-hotel hereby approved.

Reason: To encourage sustainable forms of transportation in the interest of highway flow and safety.

- 12 Any plant shall be installed, together with any associated ancillary equipment, so as to prevent the transmission of noise and vibration into neighbouring premises. The rated noise level from all plant and ancillary equipment shall be 10dB(A) below the measured background noise level when measured at the nearest noise sensitive premises.

Reason: To protect acceptable local noise levels.

- 13 Details of materials for all external work, including samples which shall be made available for viewing on site or within another location as agreed, shall be submitted to and approved in writing by the Local Planning Authority before any above ground level works are commenced (excluding demolition). The work shall be carried out in accordance with the approved details.

Reason: To ensure a satisfactory development which does not prejudice the amenity of the locality.

- 14 Prior to the commencement of the development a Construction and Demolition Method Statement shall be submitted to and approved in writing by the Local Planning Authority outlining measures that will be taken to control dust, noise, construction traffic and other environmental impacts of the development. The approved statement shall be implemented throughout the duration of construction.

Reason: To safeguard the amenity of the neighbours by minimising impacts of the development that would otherwise give rise to nuisance.

- 15 Prior to the commencement of piling, a piling method statement detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, measures to prevent and minimise the potential to disturb the amenities of nearby occupiers, and the programme for the works shall be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

- 16 Prior to the commencement of works (excluding demolition and the digging of the basement or foundations), details of the kitchen extract system, shall be submitted to and approved in writing by the Local Planning Authority. These details shall include the following:
- Plans showing the route the extract duct will take through the building and associated layout of rooms and showing that the flue will terminate at least 1m above the roof height of the building
 - Details of the odour abatement equipment to be installed;
 - Calculation showing that acceptable noise levels (i.e. Good resting conditions) will be achieved in the most affected hotel rooms and specifications of any noise abatement equipment needed to achieve these conditions.

The kitchen extract shall be installed and operated in accordance with the approved details and thereafter maintained in accordance with the manufacturer's specifications.

Reason: To achieve good resting conditions for the hotel residents and to protect the amenity of

neighbouring residents.

- 17 The development (excluding demolition) shall not commence until a drainage strategy detailing any on and/or off site drainage works has been submitted to and approved in writing by the local planning authority in consultation with the sewerage undertaker. The approved strategy shall be implemented in full prior to first occupation of the development hereby approved.

Reason: The development may lead to sewage flooding ; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community.

- 18 Development shall not commence until a drainage strategy detailing how surface water will be managed on site , including the consideration of the use of SuDS, has been submitted to and approved in writing by the local planning authority. The approved details shall be implemented in full prior to first occupation of the building hereby approved.

Reason: To ensure that sufficient measures are made available to cope with the new development; and in order to avoid adverse environmental impact upon the community.

- 19 The proposed railing planters shall be suitably landscaped in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority prior to their installation. The approved landscaping work shall be completed prior to first occupation of the development hereby approved and thereafter maintained.

The submitted scheme shall include details of:

- a) the planting scheme, which shall include species, size and density of plants
- b) a landscaping maintenance strategy, including details of management responsibilities;

Any trees and shrubs planted in accordance with the landscaping scheme which within 5 years of planting, are removed, dying, seriously damaged or become diseased, shall be replaced to the satisfaction of the Local Planning Authority, by trees and shrubs of similar species and size to those originally planted within the next available planting season.

Reason: To ensure a satisfactory standard of appearance and to ensure that the proposed development enhances the visual amenity of the locality.

- 20 Details of any external lighting shall be submitted to and approved in writing by the Local Planning Authority prior the installation of the lighting. This shall include details of the lighting fixtures, luminance levels within and adjoining the site. The lighting shall not be installed other than in accordance with the approved details.

Reason: In the interests of safety and the amenities of the area.

- 21 Prior to the commencement of works, an Air Quality Neutral Assessment shall be submitted to and approved in writing by the Local Planning Authority. The report must be undertaken in accordance with guidance published by the Greater London Authority (GLA). The assessment shall include mitigation proposals should it be found that the development is not air quality neutral. The measures within the approved assessment shall thereafter be implemented in full throughout the construction and prior to first occupation of the development (where relevant).

Reason: To ensure that the development would not result in a detrimental impact on local air quality.

- 22 Within 6 months of the first occupation of the development, a Post Construction Stage Review BRE Certificate shall be submitted to and approved in writing by the Local Planning Authority. The certificate shall demonstrate that the Development has achieved BREEAM "Excellent" unless otherwise agreed in writing by the Local Planning Authority. The Development shall be maintained so that it continues to comply for the lifetime of the Development.

Reason: to ensure the Development is designed and constructed to improve environmental performance and adapt to the effects of climate change over time.

- 23 The tree protection proposals as contained within the Arboricultural Report prepared by ACS Consulting (dated October 2017), shall be adhered to in full throughout for the full period of construction of the development hereby approved. Two separate meetings shall be arranged between the site manager and Brent's tree protection officer to enable the tree protection officer to observe (1) the erection of the protective fencing and (2) the dismantlement of the protective fencing at the relevant points during construction.

Reason: For assurance that trees are to be protected to minimise negative external impacts of the development.

INFORMATIVES

- 1 The applicant is advised to review the Council's Code of Construction Practice. Noisy works are permitted:
- Mon-Fri 0800-1800
- Sat 0800-1300
- Audible works should not be carried out at any time on Sundays and Bank Holidays.
- 2 A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing www.thameswater.co.uk/wastewaterquality. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality.
- 3 Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses.
- 4 The applicant is advised that any hotel signage to be erected requires separate advertisement consent.
- 5 The applicant is advised by the applicant to contact the Head of Highways & Infrastructure to arrange for the crossover works to be undertaken. Such works are undertaken by the Council at the applicant's expense.
- 6 The applicant is advised to notify the Council's Highways Service of the intention to commence works prior to commencement. Such notification shall include photographs showing the condition of highway along the site boundaries.
- 7 The applicant is advised to contact the Council's tree protection officer, Lawrence Usherwood, on 020 8937 5247 in respect of meeting the requirements for the condition relating to tree protections.

- 8 The applicant is advised that this development is liable to pay the Community Infrastructure Levy; a Liability Notice will be sent to all known contacts including the applicant and the agent. Before you commence any works please read the Liability Notice and comply with its contents as otherwise you may be subjected to penalty charges. Further information including eligibility for relief and links to the relevant forms and to the Government's CIL guidance, can be found on the Brent website at www.brent.gov.uk/CIL.

Any person wishing to inspect the above papers should contact Toby Huntingford, Planning and Regeneration, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 1903