

## Agenda Item 04

### Supplementary Information Planning Committee on 13 March, 2024 Case No.

23/3365

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Location	163-165 Edgware Road, London, NW9
Description	Redevelopment of the site for a basement (with small sub-basement for sprinkler pump and swimming pool plant room), ground plus five-storey building for an apart-hotel (152 rooms) with swimming pool and gym, a public house, co-working space and associated servicing, car parking (including accessible car parking), cycle parking and landscaping.

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#### The sequential test

Members have requested further information regarding the sequential test that is applied to the location of hotels as discussed within paragraphs 15-20 of the main report. It was concluded within this main report that there is a sequentially preferable site within the Wembley town centre (Malcolm House), but that this site is also allocated for the provision of new homes with an indicative capacity of 100 homes which could not be provided if the hotel is provided on this site. The need for visitor accommodation and limited number of allocated or available sites (for hotel uses) were also highlighted when concluding that the proposed hotel is acceptable in principle.

The following is set out within Policy BE9 of the Brent Local Plan:

*Future hotel provision will be encouraged in the two major town centres of Wembley and Kilburn. In addition to sites allocated in this plan, hotels and other visitor accommodation will be appropriate in town centres in accordance with the sequential approach...*

This policy highlights the importance of ensuring that the provision of hotels: *a) do not significantly compromise the supply of land for new homes on allocated housing sites and the council's ability to meet its housing targets.*

As discussed in the main report, a Hotel Needs Study was submitted to support the application which included a sequential test of available town centre sites (pages 29-31 of the Hotel Needs Study).

In line with the policy, a review of available sites within the designated Wembley and Town Centres was undertaken and a list of evaluated sites was included within the study. All sites that were tested were found to be too small to accommodate this development with the exception of 254 Kilburn High Road which was ruled out as only the ground floor was available.

Site assessment from submitted Hotel Needs Study (see page 30 of the Hotel Needs Study):

#### Site Assessment - Wembley and Kilburn

Site	Location	Size	Current Use	Assessment
4 Watkin Road	Wembley Park	0.08 acres	Three vacant light industrial units, previously providing vehicle repair	Site is too small to accommodate the scale and form of development. Site is currently in exchange and so is not available
Unit 10a Wembley Park Business Centre	Wembley Pak	0.03 acres	Single light industrial warehouse unit	Site is too small to accommodate the scale and form of development. Site is currently under offer and so is not available
Unit 6, 19-33 Ealing Road, Wembley	Wembley	0.02 acres	Single retail unit	Site is too small to accommodate the scale and form of development.
215 & 215a East Lane, Wembley	North Wembley	0.08 acres	Two storey commercial unit and adjacent warehouse/Industrial unit	Site is too small to accommodate the scale and form of development.
254 Kilburn High Road, Kilburn	Kilburn	0.49 acres	Vacant ground floor commercial unit within residential development	Development opportunity limited to ground floor only
108 -114 Kilburn High Road, Kilburn	Kilburn	0.27 acres	Ground floor retail unit	Site is too small to accommodate the scale and form of development.
231 Kilburn High Road, Kilburn	Kilburn	0.03 acres	Ground floor retail unit	Site is too small to accommodate the scale and form of development.
12 Cambridge Park, North Maida Vale	Kilburn Park	0.08 acres	Upper floors of townhouse currently used for 'Other - Professional Medical (D1)' use	Site is too small to accommodate the scale and form of development.
6 Blenheim Terrace, Kilburn	Kilburn	0.04 acres	Ground floor and basement retail unit	Site is too small to accommodate the scale and form of development. Site is currently under offer and so is not available

Source: CoStar / EG Radius / Avison Young

#### Future Supply Sites - Wembley and Kilburn (as detailed on page 20)

Site	Location	Size	Current Use	Assessment
St George's Hotel	Wembley	0.17 acres	Fomer Allied Irish Bank site adjacent to existing St George's Hotel	Site is too small to accommodate the scale and form of development. Site is currently not available and already earmarked for hotel use
Novotel London Wembley	Wembley Park	2.05 acres	Combined site include 3 and 5 Olympic Way with existing mix of uses including office, residential and hotel	Site is not currently available and proposals include the expansion of existing hotel
Wembley Park	Wembley Park	n.a	Existing land forming part of Wembley Park Masterplan	Site is not currently available and forms part of larger masterplan proposals

Source: CoStar / EG Radius / AMPM / Avison Young

As discussed within the main report, officers reviewed the available sites and allocations and consider that the Premier Inn site (opposite Wembley Park Station) is allocated for hotel redevelopment but not currently available whilst the Malcolm House site is allocated for a range of uses which could include hotel and is available. The consideration of these sites is contained within the main report (see paragraphs 17-18). Other allocated sites include the Elm Road Hotel site which already has consent for a hotel development and the Bridge Park Site which is likely to come forward with proposals for another hotel in the future.

An assessment of the available sites within the Colindale and Burnt Oak centres was included within the Hotel Needs Study which concluded that the available sites within these centres are too small to accommodate the proposed development. Officers consider these findings to be robust. It should be noted that the application site is adjacent to but not within the centre.

The site assessment from the Hotel Needs Study is as follows (see page 31 of the study):

#### Site Assessment - Colindale and Burnt Oak

Site	Location	Size	Current Use	Assessment
231-239 Edgware Road, Colindale	Colindale	0.06 acres	Eight small commercial units	Site is too small to accommodate the scale and form of development
16-18 Carlisle Road, Colindale	Colindale	0.14 acres	Mixed use industrial building (B1/2/8)	Site is too small to accommodate the scale and form of development
Unit 2 Grahame Park Way, Colindale	Colindale	0.12 acres	Existing car wash and storage area	Site is too small to accommodate the scale and form of development
12 Aerodrome Road, Colindale	Colindale	0.04 acres	Ground floor retail unit within Beaufort Park (A1/2/3/4/5, B1 or D1)	Site is too small to accommodate the scale and form of development
15a Boulevard Drive, Colindale	Colindale	0.04 acres	Ground floor retail unit within Beaufort Park (A1/2/3/4/5, B1 or D1)	Site is too small to accommodate the scale and form of development
Unit Hurricane Trading Estate, Avion Crescent, Colindale	Colindale	0.04 acres	Mixed use industrial building (B1/2/8)	Site is too small to accommodate the scale and form of development
1 Cool Oak Lane	Colindale	0.11 acres	Ground floor commercial unit (E)	Site is too small to accommodate the scale and form of development
125 Burnt Oak Broadway	Burnt Oak	0.05 acres	Ground floor storefront retail/residential	Site is too small to accommodate the scale and form of development. Site is currently under offer and so is not available
37 Watling Avenue	Burnt Oak	0.04 acres	Ground floor retail and two first floor apartments	Site is too small to accommodate the scale and form of development
21 Watling Avenue, Burnt Oak	Burnt Oak	0.02 acres	Ground floor general retail unit (A1)	Site is too small to accommodate the scale and form of development
100 Burnt Oak Broadway, Burnt Oak	Burnt Oak	0.32 acres	Basement, ground and first floor retail unit within The Icon mixed use development (A1/2/3/4/5, B1 or D1)	Site is too small to accommodate the scale and form of development
104 Burnt Oak Broadway, Burnt Oak	Burnt Oak	0.35 acres	Mixed use including retail, office and residential alongside rear car park	Site is too small to accommodate the scale and form of development
263 Burnt Oak Broadway	Burnt Oak	0.03 acres	Ground and first floor retail unit	Site is too small to accommodate the scale and form of development
299 Burnt Oak Broadway	Burnt Oak	0.06 acres	Ground floor retail and first floor residential	Site is too small to accommodate the scale and form of development

Source: CoStar / EG Radius / Avison Young

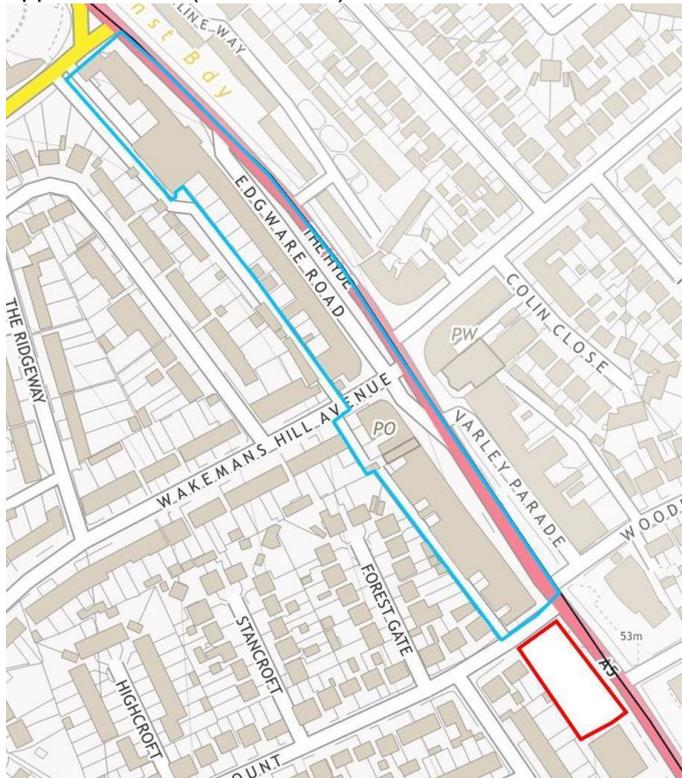
#### Future Supply Sites - Colindale and Burnt Oak (as detailed on page 20)

Site	Location	Size	Current Use	Assessment
Mar House Hotel	Colindale	0.26 acres	Vacant retail space forming ground and first floors of existing mixed use building including residential	Site is not currently available and too small to accommodate scale and form of development.

Source: CoStar / EG Radius / AMPM / Avison Young

It is noted that the other designated centres within Brent were not assessed (which include Kingsbury, Kenton, Preston Road, Sudbury, Neasden, Alperton, Cricklewood, Church End, Willesden, Harlesden, Kensal Rise and Queens Park). When applying the policy, a location within a designated town centre would be sequentially preferable to one that is outside of a centre. While these haven't been tested by the applicant, it is considered unlikely that there are sites within these designated town centres which are available for redevelopment and sufficiently sized. In this instance, the subject site is also adjacent to a town centre the submission demonstrates a need for the accommodation. When considering criteria a) of policy BE9 (whether the hotel would reduce the capacity for residential dwellings), it is noted that the site is not allocated or within a town centre and would be treated as a windfall site in terms of housing provision. While the proposal will not result in an increase in the number of homes, it is not considered to compromise the council's ability to meet its housing targets and results in benefits in terms of the provision of visitor accommodation to meet need and the associated economic benefits. The proposed provision of a hotel is considered to be acceptable on balance.

Excerpt from the Brent planning policies map showing the Colindale town centre (outlined blue) and the application site (outlined red):



#### Sequential Test summary

As discussed in the main report, while the Malcolm House site is available for a hotel development of comparable size and would represent a sequentially preferable site (being within the Wembley Town Centre), the Malcolm House site allocation also identifies this site as suitable for residential use with an indicative capacity of 100 homes. It is also noted that there is a very significant need for visitor accommodation and a very limited number of sites are allocated or available for hotel use. On balance, the provision of a hotel in the location that is proposed is considered to be acceptable.

#### Amendment to recommendation

Within the 'Recommendations' section, resolution to grant consent is incorrectly noted as being 'subject to the application's referral to the Mayor of London (stage 2 referral)'. This scheme is not referable to the Mayor and the grant planning permission is subject to conditions and the prior completion of a legal agreement, with the obligations that are set out within the 'Recommendations' section.

**Recommendation: To grant planning permission subject to the draft conditions as set out within the main committee report and the prior completion of a legal agreement**

*Document Imaged*