

COMMITTEE REPORT

Planning Committee on
Item No
Case Number

13 November, 2024
05
23/3250

SITE INFORMATION

RECEIVED	10 October, 2023
WARD	Wembley Hill
PLANNING AREA	Brent Connects Wembley
LOCATION	1-11 Elm Road and 10-12 St Johns Road, Wembley, HA9
PROPOSAL	Demolition of existing hotel building and community centre and erection of a part 6, part 8 and part 10 storey 318 room aparthotel plus basement accommodation with associated ancillary facilities, community floorspace (Use Class F1/F2), servicing, landscaping and cycle and refuse storage
PLAN NO'S	See 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_166545</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 "23/3250" (i.e. Case Reference) into the search Box3. Click on "View Documents" tab

RECOMMENDATIONS

That the Committee resolve to GRANT planning permission subject to the application's referral to the Mayor of London (stage 2 referral) and the prior completion of a legal agreement to secure the following planning obligations:

1. Payment of the Council's legal and other professional costs in (a) preparing and completing the agreement and (b) monitoring and enforcing its performance.
2. Notification of material start 28 days prior to commencement.
3. Financial Contribution of £16,000 towards the removal of two off site street trees and the planting of four off-site street trees and their maintenance within the vicinity of the site.
4. Training and employment of Brent residents - Prior to a material start:
 - a. To inform Brent Works in writing of the projected number of construction jobs and training opportunities and provide a copy of the Schedule of Works;
 - b. To prepare and submit for the Council's approval an Employment Training Plan for the provision of training, skills and employment initiatives for residents of the Borough relating to the construction phase and operational phase of the development with a financial contribution towards any shortfalls in targets as set out within Brent's Planning Obligations SPD;
 - c. Financial contribution of £80,750 to Brent Works for job brokerage services.
5. Submission and approval in writing of a Travel Plan based upon the submitted framework within 6 months of the Hotel opening.
6. S38/278 highways works under the Highways Act 1980 to provide:
 - Amendments to the crossovers to the development including widening of the existing crossover to serve the proposed loading bay, removal of the existing redundant crossover from St. John's Road to the hotel and reinstatement to footway with full-height kerbs and associated amendments to the on-street parking bays.

AND

- Highway improvement works at the junction of Elm Road/St. John's Road in line with the proposals shown on drawing 3676-LBA-XX-00-DR-L-200002/P9 contained within the s106 Agreement for the development at 6 St. John's Road (LPA Ref: 21/4155) OR a financial contribution of £50,000 towards highway improvements in the vicinity of the site in the event that these works have already been delivered or are programmed to be delivered by the developer of 6 St. John's Road.
7. Energy assessment
 - d. Detailed design stage energy assessment. Initial carbon offset payment to be paid prior to material start if zero-carbon target not achieved on site (Estimated to be £59,921.25).
 - e. Post-construction energy assessment. Final carbon offset payment upon completion of development if zero-carbon target not achieved on site (Estimated to be £59,921.25).
 - f. 'Be seen' energy performance monitoring and reporting
 8. Financial Contribution of £117,000 towards bus service enhancements
 9. Implementation of recommendations in the submitted Television and Radio Reception Impact and underwriting of all mitigation required in addressing any interference.

10. Indexation of contributions in line with inflation from the date of committee resolution.

11. 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 attach informatives in relation to the following matters:

Conditions

Compliance

1. Three year rule
2. Approved drawings and documents
3. Maximum number of hotel rooms
4. Hotel and community use restrictions
5. Obscured glazed windows
6. Maintenance access
7. Provision of accessible hotel rooms
8. Hotel occupancy restriction (90 days)
9. Non Road Mobile Machinery
10. Tree protection measures
11. Compliance with Ecological Appraisal recommendations
12. Compliance with Drainage Strategy recommendations
13. Compliance with Noise report recommendations
14. Compliance with Odour Report recommendations
15. Provision of cycle parking prior to use commencing

Pre-Commencement

16. Construction Management Plan
17. Construction Method Statement
18. Construction Environment Management Plan

During Construction

19. Land Contamination Investigation, remediation and verification
20. External materials
21. Digital connectivity
22. District heating network connection
23. Landscaping scheme

Pre-Occupation

24. External lighting strategy
25. Community Use Agreement
26. Accessibility Management Plan (hotel use)
27. Delivery Servicing Plan
28. Coach Management Plan
29. Whole-Life Carbon
30. Circular Economy
31. Plant Noise

Post-Completion

32. BREEAM certification

Informatives as listed in the Committee Report.

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 the “expiry date” of this application (subject to any amendments/extensions to the expiry date agreed by both parties) the legal agreement has not been completed, the Head of Planning is delegated authority to refuse planning permission.

That the Committee confirms that adequate provision has been made, by the imposition of conditions, for the preservation or planting of trees as required by Section 197 of the Town and Country Planning Act 1990.

SITE MAP



Brent

Planning Committee Map

Address: 1-11 Elm Road and 10-12 St Johns Road, Wembley, HA9

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This map is indicative only.

SUMMARY OF KEY ISSUES

The key planning issues for Members to consider are set out below. Members will need to balance all of the planning issues and the objectives of relevant planning policies when making a decision on the application.

Representations received: 308 neighbours were consulted as part of the proposal. In response, objection comments were received from 14 separate individuals. One individual support comment and a petition containing letters of support from 33 different individuals were also received. The comments are detailed within the consultation section below.

Principle of redevelopment of the site: Proposed uses are supported in principle and considered to be in accordance with strategic and local policies relating hotel uses, and re-provision of flexible community space. The regeneration of the site and the contribution that this would make in terms of the streetscene and to employment and other economic benefits associated with the hotel is supported.

Design, layout and height: The proposed building would exceed 30m in height and whilst not located within a tall building zone, is considered to be appropriate for this site within the emerging context of the Elm Road Site Allocation (Policy BSWSA10) and the transitional character of the taller buildings delivered and approved along the High Road. The height and scale proposed would larger than the existing context however the impact of this is considered to be successfully mitigated by the proposed approach to materiality and detailing. Ground floor uses and public realm enhancements would help to further activate this part of Elm Road/St. John's Road in accordance with the site aspirations. The hotel accommodation is sufficiently high quality and would meet the requirements of the future users.

Neighbouring amenity: As the report below acknowledges, there would be some impacts to neighbouring residential properties in terms of loss of light and outlook, BRE daylight and sunlight and overshadowing assessments have taken into account a number of nearby sensitive receptors. The proposal would have a higher level of impact on some windows and gardens of some properties than others. However, the level of impact is not considered to be unduly detrimental given the urban nature of the site and that a number of the affected properties are also within the wider site allocation. The overall impact of the development is considered acceptable, particularly in view of the wider benefits of the scheme in terms of the Council's strategic objectives.

Highways and transportation: The scheme would provide suitable cycle parking provision and would be car free in line with policy. It would encourage sustainable travel patterns within the high PTAL area. A number of highway works and public realm improvements would be secured as summarised within the Section 106 Heads of Terms above and detailed within the remarks section below.

Landscape, ecology, biodiversity and flooding/drainage: 13 new street trees are proposed as part of the development (on and off site) and the UGF score would be 0.41. The development would also achieve an overall net gain in biodiversity. Additionally, whilst flood risk on site is low, mitigation measures are proposed to ensure surface water run-off is reduced and suitably managed.

Environmental impact, sustainability and energy: The measures outlined by the applicant achieve the required improvement on carbon savings within London Plan policy. Subject to appropriate conditions, the scheme would not have any detrimental impacts in terms of air quality, land contamination, noise and dust from construction, and noise disturbance to existing/future residential occupiers.

Site Designations

Relevant site designations:
Air Quality Focus Area
Air Quality Management Area
Elm Road Site Allocation (Policy BSWSA10)
Horsenden Hill Protected View
Wembley Growth Area

Nearby:
 Adjoining the Wembley Town Centre
 20m North-West of the Cecil Avenue Tall Building Zone
 Approx. 37m South of SNIC Grade I Chiltern Line and Wildlife Corridor

Land Use Details

Site area (ha):	0.16ha
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Non-residential details:			
	Use Description	Use Class	Floorspace (m²) (Gross Internal Area)
Existing	Hotel (1-11 Elm Road)	C1	1,215m ²
	Church (10-12 St. John's Road)	F1	145m ²
Proposed	Hotel	C1	10,090m ²
	Flexible Community Space	F1/F2	220m ²
Total Proposed			10,310m ²

Parking

	Car Parking Spaces (General)	Car Parking Spaces (Disabled)	% EVCP	Bicycle Spaces	
				Short stay	Long stay
Existing	Informal	N/A	N/A	N/A	N/A
Proposed	0	0	N/A	10	17

Environmental performance

	Policy target	Proposed
Energy		
Percentage of on-site carbon savings beyond Part L of Building Regulations (2021)	35%	37.23%
Percentage of on-site carbon savings achieved through energy efficiency measures	Non-residential - 15%	23.27%
Off-site reduction (%) and/or carbon offset contribution	Shortfall to net-zero	£119,842.50
Unregulated carbon emissions	Major developments should calculate and minimise unregulated carbon emissions	Information submitted
Sustainability		
BREEAM score	Excellent	Excellent

Urban Greening Factor (UGF)	0.3	0.41
Biodiversity Net Gain (BNG)	Positive	0.35 units (Positive)

PROPOSAL IN DETAIL

The proposal seeks full planning permission for the comprehensive redevelopment of the site to provide a part 6, part 8, part 10 storey building, comprising 318 apart-hotel rooms (Use Class C1) and 220 sqm of Flexible Community Space (Use Classes F1/F2).

The scheme would also include ancillary cycle parking, back of house facilities and refuse stores.

Summary of amendments since submission

Amended and additional plans and documents were received during the course of the application, these include the following key changes:

- Off-site servicing area incorporated to the north-west of the site. Associated re-configuration of the flexible F1/F2 space and café/reception space;
- Replacement planting of the existing two street trees along Elm Road and removal of the corner public highway street tree proposed; and,

Maintenance access doors added for the rear courtyard light well and doors added at second/seventh floor levels for visitor access to the west facing balconies.

EXISTING

The application site is located on the corner of St. John's Road and Elm Road. It contains two buildings; the Euro Hotel fronting onto Elm Road, and the Spritualist Church, fronting onto St. John's Road. The existing hotel site benefits from a planning permission to be redeveloped into a modern purpose-built hotel building (approved in 2018 – LPA ref: 18/1592).

To the north and east of the site are a row of two storey terraced houses. Two-storey residential properties along St. John's Close are also located to the rear of the site. To the west is St. John's Road, separating the site from further residential properties and to the south is Elm Road, separating the site from a two-storey red brick building containing a Jobcentre retail unit. The Jobcentre site has an extant planning permission for the redevelopment of the site to contain a part 5, part 18 storey building comprising 79 new homes (LPA ref: 21/4155).

The site is located within the Wembley Growth Area. It is situated just beyond the north-west of the Wembley Town Centre boundary and approximately 20m north-west of a Tall Building Zone. The site also forms part of a wider Site Allocation BSWSA10 in the Brent Local Plan allocated (beyond the town centre boundary) for mixed use residential led development, a hotel and supporting community facilities.

The site does not fall within a conservation area and there are no listed buildings within the site's curtilage or within the immediate locality. The site is within an Air Quality Focus Area.

RELEVANT SITE HISTORY

Relevant Planning History

21/4131: Certificate of lawfulness for existing implementation of Full Planning Permission reference 18/1592 dated 17 October, 2018, for Demolition of existing hotel buildings and erection of a part 3, part 4 and part 5 storey 226 bed aparthotel plus basement accommodation comprising guestrooms and ancillary facilities within a 5-storey basement (situated below the part-basement lower ground floor), together with soft and hard landscaping, servicing, cycle storage and refuse and recycling facilities, subject to a Deed of Agreement dated 15 October 2018 under Section 106 of the Town and Country Planning Act 1990, as amended.

Certificate Granted on 31/12/2021.

21/2245: Non material amendment to allow: Introduction of Phasing plan condition

- Phase 1: Digging of trench up to 2 metres
- Phase 2: All other works

of Full Planning Permission reference 18/1592 dated 17 October, 2018, for Demolition of existing hotel buildings and erection of a part 3, part 4 and part 5 storey 226 bed aparthotel plus basement accommodation

comprising guestrooms and ancillary facilities within a 5-storey basement (situated below the part-basement lower ground floor), together with soft and hard landscaping, servicing, cycle storage and refuse and recycling facilities, subject to a Deed of Agreement dated 15 October 2018 under Section 106 of the Town and Country Planning Act 1990, as amended. **Permission Granted on 16/07/2021.**

18/1592: Demolition of existing hotel buildings and erection of a part 3, part 4 and part 5 storey 226 bed aparthotel plus basement accommodation comprising guestrooms and ancillary facilities within a 5-storey basement (situated below the part-basement lower ground floor), together with soft and hard landscaping, servicing, cycle storage and refuse and recycling facilities, subject to a Deed of Agreement dated 15 October 2018 under Section 106 of the Town and Country Planning Act 1990, as amended. – **Granted, 17/10/2018.**

CONSULTATIONS

Public Consultation

A total of 308 neighbouring properties were consulted by letter on the proposal on the 27th November 2023 for a 21 day period.

The application was also advertised by two site notices displayed on 13th December 2023 and in the local press on 30th November 2023.

In response to the consultation, comments of objection were received from 14 individual residents. These are as summarised below.

A petition containing letters of support from 33 individuals was also received. The letters outline that the proposed development is attractive and thoughtful and responds to the changing character of Brent town centre. It is noted that this would offer positive outcomes for both businesses and residents, bringing more trade opportunities to the local area and new employment opportunities.

One individual comment of support was received stating that the additional bedrooms would meet a defined gap in the market to support demand, and the proposed mix of bedroom types would assist guests with a variety of options.

Objection	Officer Response
Design	
Proposal would fail to be consistent with the existing architecture which is low rise, terraced homes.	Please refer to the 'Design, Character and Impact on the Street Scene' section of the below report.
The development does not fall within a Tall Building Zone and height restrictions should be observed.	Please refer to the 'Design, Character and Impact on the Street Scene' section of the below report.
Land Use	
There is an over-intensification of hotel uses within the locality	Please refer to the 'Principle of Development' section of the below report.
There is no public benefits to the proposal	There are a number of benefits including the redevelopment of an under used site, improvements to the street scene and the economic benefits (including construction and operational jobs).
This is a residential area where commercial uses should not be permitted.	Please refer to the 'Principle of Development' section of the below report.
Highway Impact	
Insufficient parking for the proposed hotel resulting in detrimental levels of overspill parking onto the surrounding road network and car parks. The plans show that two resident parking bays would be removed and there is already a shortage of spaces.	Please refer to the 'Transport and Highway Considerations' section of the below report.

Construction works will impact on neighbouring residents/businesses due to construction traffic routes and noise and dust pollution.	Whilst there would be some disruption to local residents during the construction period, a construction management plan and construction logistics plans would be conditioned to any grant of planning permission to minimise the impact of the construction works on local residents.
The traffic situation at the junction of Elm Road and St. John's Road is already bad with cars and commercial vehicles parked on both sides of the roads.	Planning permission was recently granted for the redevelopment of the site at No. 6 St. John's Road. As part of the s106 Legal Agreement attached to this consent, the developer is required to enter into a s38/278 Legal Agreement with Brent Highways for significant highways improvements to this junction. Should the subject application be granted planning permission, it would also be subject to a s106 Legal Agreement which would secure a financial contribution of £50,000 to highways improvements within the area or would require the developer to enter into a s38/278 agreement to provide the above improvements to this junction if the 6 St. John's Road consent does not come forward.
The transport plan submitted refers throughout to the aparthotel being a car free hotel but doesn't contemplate the fact that most travellers to the aparthotel would arrive by taxi which would significantly increase the number of cars in what is an already congested area.	Please refer to the 'Transport and Highway Considerations' section of the below report.
Hotel coaches would take up 3 or 4 parking spaces and would only need 1 permit per day to stay.	Please refer to the 'Transport and Highway Considerations' section of the below report.
Heavy goods vehicles making regular deliveries would further disrupt the highway.	Please refer to the 'Transport and Highway Considerations' section of the below report.
Impact on neighbouring properties	
Adversely impact on neighbouring residential properties through loss of light and sunlight, loss of outlook and increased overlooking/loss of privacy	Please refer to the 'Impact on Neighbouring Residential Amenity' section of the below report.
The Daylight Sunlight Report incorrectly states that 10-14 Elm Road is situated south of the application site. It is south-east and therefore during summer in the afternoon, the building would be in the shadow of the block.	These properties are south of the application site. With regard to sunlight, BRE Guidance states that all main living rooms of dwellings, and conservatories should be checked if they have a window facing within 90 degrees of due south. The windows on these properties facing the application site are not within 90 degrees of due south and are therefore not material for assessment. Based upon this, the level of sunlight received by these properties would be acceptable.
Other Matters	
Increased anti-social behaviour and fly-tipping	Please refer to the 'Public Realm' subsection of the below report.
Concerns over poor air pollution	The application has been accompanied by an air quality impact assessment that concluded that the occupiers of the development would not be exposed to harmful levels of pollutants. Furthermore, the scheme has been designed to be air quality positive in terms of building and transport emissions. Conditions are also recommended in relation to a

	construction management plan to cover matters such as dust from the construction works and for a condition to be secured on non-mobile construction machinery.
Increased noise disturbance and light disturbance at night. This includes servicing to the proposed café.	In terms of noise disturbance, please refer to the 'Environmental Health Considerations' section of the below report. Details of external light would be conditioned to any forthcoming consent.
Proposal would impact on utilities	Please refer to the Flood Risk and Drainage' section of the below report. Impact on other utilities such as electrical cables would not be considered under the remit of the planning system.
The hotel group owns a number of properties along Elm Road and St. John's Road. Due diligence should therefore be taken on the responses received.	The Council has a statutory duty to consider all comments, whether they are in support of the proposal or objection.
There would be major TV disruption for anyone who uses freeview and has a freeview aerial on their roof, as any house north of the proposed development will have their aerials pointing in exactly that direction. TV channels (especially HD) would be limited, or worse still, freeview may not work at all.	Please refer to the 'Impacts of Microclimate and Reception of TV and Radio Services' section of the below report.
The existing hotel has taken away from the garden space at No. 4 St. John's Close.	Boundary disputes are not a material planning consideration.

Statutory/External Consultees

Greater London Authority:

Land Use Principles: The principle of redeveloping the site to provide a 318-room aparthotel and community facility within Wembley Opportunity Area is supported in principle.

Urban Design: The proposed height, massing and density is generally supported from an urban design perspective; however, further refinement is recommended in townscape terms.

GLA Officers noted the difference in scale compared to the existing terraced houses and encouraged the applicant to work with Brent Council to explore potential alternative transition opportunities. These comments were noted by Brent who consider the transition to be appropriate within the context of the existing and emerging context. This is discussed in more detail below.

Transport for London – No objection following amendments to the site's servicing arrangements. Financial contribution towards bus service enhancements and conditions requested. These are discussed below.

Metropolitan Police: Designing out Crime – Objection received in relation to operational security measures. This is discussed below.

Internal Consultation

Environmental Health – no objections subject to conditions being secured in relation to a construction method statement, non-road mobile machinery, and land contamination.

Environmental Health Noise Team: No objections subject to conditions being secured in relation to plant noise and the mitigation measures being secured in relation to internal noise levels.

Local Lead Flood Authority - No objections raised.

POLICY CONSIDERATIONS

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of this application should be in accordance with the development plan unless material considerations indicate otherwise.

The development plan is comprised of the:

- London Plan 2021
- Brent Local Plan 2019-2041

Key policies include:

London Plan 2021

GG2: Making the best use of land
GG5: Growing a good economy
SD1: Opportunity areas
D3: Optimising site capacity through the design-led approach
D4: Delivering good design
D5: Inclusive design
D9: Tall buildings
D12b: Fire Safety
D14: Noise
S1: Developing London's social infrastructure
E8: Sector growth opportunities and clusters
E10: Visitor Infrastructure
E11: Skills and opportunities for all
G5: Urban Greening
G6: Biodiversity and access to nature
G7: Trees and woodlands
SI1: Improving Air Quality
SI2: Minimising greenhouse gas emissions
SI3: Energy Infrastructure
SI4: Managing heat risk
SI5: Water Infrastructure
SI6: Digital connectivity infrastructure
SI7: Reducing waste and supporting the circular economy
SI13: Sustainable Drainage
T1: Strategic approach to transport
T2: Healthy Streets
T4: Assessing and mitigating transport impacts
T5: Cycling
T6: Car Parking
T6.4: Hotel and leisure use parking
T7: Deliveries, servicing and construction
T9: Funding transport infrastructure through planning

Brent Local Plan 2019-2041

DMP1: Development Management General Policy
BP1: Central
BCGA1: Wembley Growth Area
BSWSA10: Elm Road
BD1: Leading the Way in Good Urban Design
BD2: Tall Buildings
BD3: Basement Development
BSI1: Social Infrastructure and community facilities
BE1: Economic Growth and Employment Opportunities for All
BE9: Visitor Accommodation and attractions
BHC2: National Stadium Wembley
BGI1: Green and Blue Infrastructure
BGI2: Trees and Woodlands
BSUI1: Creating a resilient and efficient Brent
BSUI2: Air Quality

BSUI3: Managing flood risk
 BSUI4: On Site Water Management and Surface Water Attenuation
 BT1: Sustainable Travel Choice
 BT2: Parking and Car Free Development
 BT3: Freight and Servicing

Other Material Considerations

The following are also relevant material considerations:

- National Planning Policy Framework
- National Planning Practice Guidance

- Council's Supplementary Planning Document 1 "Brent's Design Guide" 2018
- Council's S106: Supplementary Planning Document 2022
- Council's Sustainable Environment & Development – SPD – 2023
- Mayor of London's 'Be Seen' energy monitoring guidance 2021
- Mayor of London's Air Quality Positive LPG 2023

DETAILED CONSIDERATIONS

Background

1. The application site benefits from a planning permission (LPA Ref: 18/1592) at the site for the demolition of the existing hotel buildings on site and the erection of a part 3, part 4 and part 5 storey 226 bed aparthotel plus basement accommodation comprising guestrooms and ancillary facilities within a 5-storey basement (situated below the part-basement lower ground floor), together with soft and hard landscaping, servicing, cycle storage and refuse and recycling facilities.
2. A Certificate of lawfulness for the existing implementation of the planning permission was granted on 31/12/2021 (LPA Ref: 21/4131). As such, the above consent is extant, and forms a material planning consideration within the assessment of the subject application.
3. The key differences between the extant consent and the subject application are set out below:

	18/1592	23/3250
Site Size	~0.12 ha	~0.18 ha The additional plot size includes the Spiritualist Church site to the north-west of the previous application site.
Building Height	15.6m – Part 3, 4 and 5 storeys above ground, 5 basement levels.	37.6m – Part 6, 8 and 10 storeys above ground, 1 basement level.
Number of Rooms	226	318

Principle of Development

4. The application site comprises a set of five Edwardian terraced 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. In addition, a two-storey building at 10-12 St Johns Road is also part of the site which comprises a Spiritualist Church. The site is within the Wembley Growth Area.

5. The proposal is for redevelopment of the site to provide 318 apart-hotel units over 10 storeys (37 metres) with steps to the side reaching 8 and 6 storeys. The building would also incorporate basement accommodation, community floorspace, and associated facilities.

Apart-Hotel

6. Policy E10 of the London Plan states that London's visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure, particularly to parts of outer London well-connected by public transport. In outer London, serviced accommodation should be promoted in town centres and within Opportunity Areas (in accordance with the sequential test as set out in Policy SD7 Town centres: development principles and Development Plan Documents) where they are well-connected by public transport, particularly to central London.
7. The proposal seeks the redevelopment of the site, to provide a 318 room apart-hotel. Apart-hotels are defined within the London Plan as self-contained accommodation (within Use Class C1), providing for short-term occupancy, with a concierge and room service.
8. In support of Policy E10, Brent's Local Plan at paragraph 6.4.58 identifies that 'The GLA has forecast future demand for serviced accommodation by borough, identifying a requirement for 2,622 net additional serviced accommodation rooms in Brent over the period 2015-40.' Policy BE9 (Visitor Accommodation and attractions) of Brent Local Plan highlights that future hotel provisions would be encouraged in the two major town centre sites (Wembley and Kilburn).
9. The application site is located just north of the Wembley Town Centre boundary, however is located within the Wembley Growth Area, an Opportunity Area which is identified within Local Plan Policy BCGA1 to continue to drive the economic regeneration of Brent, generating new jobs across a range of sectors including hotels. It is also located within the Elm Road Site Allocation (Local Plan Policy BSWSA10) which is for mixed used residential-led development with an indicative capacity of 400 residential units, a hotel, and supporting community facilities, along with other mixed used town centre uses. The provision of a hotel within this site allocation is in consideration of the extant consent. The application site has an excellent public transport accessibility level (PTAL 6).
10. In light of the above policy context, the provision of a hotel use in this location is considered to strengthen London's visitor economy in line with Policy E10 and would generate an increase of employment on this site, providing an offer of alternative accommodation. The principle of a hotel use has also been established by the existing use of the site and the extant consent. Whilst this use would be intensified by the subject proposal, this from a land use perspective is not considered to prejudice the future development of the area in line with the objectives of Site Allocation Policy BSWSA10.
11. As per the requirements of Policy BE9, the length of stay would be limited to a maximum of 90 days per occupant, and a planning condition would secure that residencies at the hotel accommodation of 90 days or more are to be prevented, to ensure that the use of the hotel accommodation would meet the needs identified within the London Plan and Brent Local Plan for visitor accommodation.
12. The rooms proposed comprise of small and large standard rooms (14.6sqm and 17.6sqm respectively) and standard and non-standard accessible rooms (24.7sqm and 32.2sqm respectively). The London plan requires that 10% of the new bedrooms should be wheelchair-accessible and the proposal is confirmed to include 32 new rooms which would accord with this part of the policy. This aspect would be secured via condition.
13. Applications for hotel development are also required to be accompanied by an Accessibility Management Plan (AMP) to demonstrate that the management and operation of accessible rooms is considered from the outset of the design and that accessibility and inclusion are monitored and maintained throughout the life of the development. An AMP has been submitted within the Design and Access Statement, which includes details relating to compliance with accessibility standards, provision of equipment, evacuation procedures and staff training. However, this confirms that, 'post-planning, an updated Accessibility Management Plan will be drafted to demonstrate the operator's commitment to the provision of a truly inclusive and accessible facility. This will be monitored and reviewed on a quarterly basis.' A condition

would be attached requiring the submission of an updated Accessibility Management Plan for approval at an appropriate future time and ongoing compliance with the approved AMP including monitoring and review procedures.

Loss of the Existing Church and Replacement Community Use

14. Site Allocation Policy BSWSA10 identifies the existing Spiritualist Church and states that any future development of this must take care to provide accessible replacement community facilities. This is reinforced by Policy BSI1 of the Local Plan which requires existing social infrastructure and community facilities to be protected and retained unless a replacement facility that would better meet the needs of the existing users is provided.
15. The redevelopment of the site would involve the loss of the existing Spiritualist Church. A schedule of areas submitted with the application indicates that the existing church building has a total GIA of 145sqm. The application proposes the reprovision of 220sqm of flexible F1/F2 community space over ground and basement floor level, indicating that the social infrastructure space would be fully re-provided. Use Class F within the Town and Country Planning (Use Classes) Order 1987 (as amended) is defined as for Local Community and Learning purposes and encompasses a range of uses including places for public worship or religious instruction. The ground floor element of the F1/F2 space would be double height, allowing for a more legible entrance space to serve the needs of the wider community.
16. A community use agreement would be secured by condition to maximise use and ensure wider community benefits, including specifying that hiring costs should be at reasonable rates. The application is therefore considered to be acceptable in principle.

Design, Character and Impact on the Street Scene

17. The NPPF emphasises that good design involves responding to local character and history and reflecting the identity of local surroundings and materials, while not discouraging appropriate innovation. Policy D3 of London Plan highlights the need for all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site.
18. Policy DMP1 requires the scale, type and design of development to complement the locality. This is reinforced in policy BD1 which seeks for new development to be of the highest architectural and urban design quality. Innovative contemporary design will be supported where it respects and complements historic character but is also fit for the future. In delivering high quality design, development proposals will be expected to show how they positively address all the relevant criteria within London Plan design policies and the Brent Design Guide SPD1.
19. 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 church and hotel building for which there is no notable architectural merit for their retention. Their demolition is therefore not considered to be contrary to planning policy, providing a high-quality design solution is being provided in replacement.

Bulk, Height and Massing

20. Policy BD2 defines a tall building that is one that is more than 30m in height above ground level. Tall buildings are directed to tall building zones in the policies map. The policy goes on to say that in intensification corridors and town centres outside conservation areas and areas of distinctive residential character developments of a general building height of 15 metres above ground level could be acceptable, with opportunities to go higher at strategic points in town centres. In all cases the tall buildings must be shown to be positive additions to the skyline that would enhance the overall character of the area. They should be of exceptional design quality, consistent with London Plan Policy requirements in showing how they positively address their visual, functional, environmental and cumulative impacts.
21. The central portion of the proposed building located on the corner of Elm Road and St. John's Road would contain 10 storeys to a maximum height of 37.6m. To the north and east along St. John's Road and Elm Road respectively, the building would be stepped to contain 8 and 6 storeys, with respective heights of 30.1m and 24.2m. A part 1, part 6 storey element would project to the rear in proximity to the site's northern boundary. Each portion of the building would contain a double height ground floor.

22. The site at present is within an area of transition, with urban, town centre uses to its south, south-east and south-west and predominantly low-density residential uses to its north, east and west as existing. This character accords with the site's setting being located just beyond the northern edge of the town centre boundary, and within the Elm Road site allocation (BSWSA10). The aspiration for the site allocation (bounded by the West Coast Mainline to the west, the Chiltern Mainline to the north, the northern side of Elm Road and High Road to the south and the western side of St Johns Road to the east) is to be developed for residential led, mid-rise development of 5-6 storeys in height. The allocation sits mostly beyond the boundaries of Wembley town centre and tall building zones and its brief anticipates a denser, urban character being established over time. The extant consent of the Euro Hotel redevelopment (ref: 18/1592) represents the first redevelopment proposal to come forward within the boundaries of this site allocation at a part 3, 4 and 5 storey height. Ultimately, the site allocation envisions the surrounding context of the subject site becoming more urban over time, and a re-characterisation of the subject site as becoming less peripheral to the town centre setting.
23. At 37.6m, the proposed building would be defined as a tall building. It would not be located within a tall building zone and represents a departure from the envisaged building heights within such a location. However, a number of locational factors are considered to result in this height being suitable within the existing/emerging context of the application site.
24. Firstly, in terms of the existing context, it is noted that there are a number of tall buildings that have been consented and delivered within the vicinity of the site, including King Edward Court, Uncle Wembley, The Assembly, Wembley Central Square and Wembley Link. The existing buildings which fall in the wider setting of the proposed development reach a variety of heights which are generally taller than the proposed building, these being King Edward Court (11 storeys), Uncle Wembley (26 storeys) and Wembley Link (18 storeys) to the east and Wembley Central Square (14 storeys) and The Assembly (18 storeys) to the south. These buildings are located within a tall building zone and are generally in areas of prominence on major thoroughfares, whereas this site sits at the confluence of two more minor roads, being slightly removed from the principal High Road setting. However, the proposed development would be similar in height to the King Edward Court development to the opposite end of Elm Road, and would act as a visual bookend to this. Another factor to note is that both St Johns Road and Elm Road notably slope downwards from the south and east respectively, resulting in a lower base height for the building than tall buildings immediately adjoining the High Road, further reducing the visual prominence of the proposal within the existing context. Elm Road also widens out significantly at its western end, with the distance between the proposed Elm Road frontage and the frontage opposite being more than 30 metres, resulting in a generous, open setting for a larger building in this corner location. By contrast, the majority of Elm Road has a frontage-to-frontage distance of less than 20 metres.
25. In terms of the emerging context, the site as noted above is located within the Elm Road site allocation (BSWSA10) which expects a general mid-rise building height of 5-6 storeys. Whilst the proposed development would be taller than this at a maximum of 10 storeys, the massing of the building would transition to the north and east down to a height of 6 storeys, thereby integrating with the emerging character. As noted above, the open character of the corner is noted as being a suitable location to support the additional height at 10 storeys in design terms. The site to the opposite side of Elm Road (No. 6 St. John's Road) also benefits from an extant planning consent for an 18-storey building with a maximum height of approximately 62m (LPA ref: 21/4155). Whilst this site is on the edge of the tall building zone, the proposed development would be significantly lower in height, thereby acting as an appropriate transition to the emerging character where such a building height is considered acceptable.
26. Beyond the locational factors that justify the height of the building, there are factors relating to the merits of the building's design that also justify this. The scheme has been revised through design review with Brent's principal urban designer at pre-application stage. Through this process, the stepped approach to the building's massing, with the main bulk of the building being located on the corner of the plot where the setting is most open is considered to constitute a successful use of land. Furthermore, the stepped appearance along both site frontages would transition seamlessly to a general character of 5-6 storeys, which is expected to emerge in this area. On balance, this approach is welcomed. Further refinement has also been made to the building façade, softening its appearance through a minimalist palette of materials which are appropriately placed to help articulate the difference in massing across the building. Furthermore, the building would have a clear base, middle, top and crown, where whilst taller than its surroundings, would appear comfortable in its setting.
27. Drawing together the above considerations, it is clear that the proposal would define a landmark building within the context of the Elm Road site allocation area, although would clearly read as a subservient addition in the context of the wider cluster of tall buildings along Wembley High Road. Furthermore,

when considering the emerging character of the area, it would also appear as an appropriate transition to both the expected character of development within the Elm Road site allocation, and the emerging character within the edge of the tall building zone. The proposal is considered to add variety to the skyline, in accordance with policy D9 of London Plan, particularly in longer views from the surrounding area towards Wembley. Whilst the immediately neighbouring buildings remain low-rise at present, and the proposal is set back from the High Road, and the planning policy context allows for mid-rise development, which weighs into officers' judgement. Whilst the development is acknowledged as being tall in its immediate surroundings, and that it is not located within a tall building zone, when considered on its own merits, the building has a positive urban design and appearance in its wider setting, with visual harm having been limited through a well composed approach to bulk, massing and façade design.

28. The London Plan places emphasis on site capacity being optimised through a design-led approach and this is set out in full in policy D3, through a qualitative approach that seeks to confirm suitable development density through the achievement of a proposal that is demonstrably of a high-quality and which is well designed. It is considered that the scheme achieves the aims of D3. On the basis of the discussion of the building's appearance within its context as discussed, it is also considered that the proposal achieves the aims of D9(c).

Townscape and Visual Impact Assessment

29. The application has also been accompanied by a Townscape and Visual Impact Assessment which has aided in informing Officer conclusions above. 8 indicative views have been provided which consider both the existing built environment context, and the emerging context of the area (specifically the extant consent at No. 6 St. John's Road.
30. View 1: Junction of the High Road with St. John's Road (west pavement), looking north-west towards the application site. This view is considered to be of a low-medium value, experienced by shoppers, road users and commuters. The increased bulk, scale and massing would be noticeable from this view. However, due to the sloped nature of St. John's Road, the overall building height would not appear out of context when viewed alongside the buildings located on the corners of St. John's Road and the High Road. Furthermore, the use of brick would help to soften the appearance, given the existing materiality within the area. When considering the extant consent at No. 6 St. John's Road, views of the proposal would be largely marred, and any impact would be negligible as part of the emerging character.
31. View 2: Elm Road (south pavement), looking west towards the application site. This view is considered to be of low value, as it has some amenity value for residents but is without any special visual interest. The proposed building would be highly visible within this view, set above the existing low-rise context of the residential buildings along Elm Road. The height would, however, be similar in this context to the existing development at King Edward Court. Furthermore, the proposed use of different brick shades would tie the development into the existing appearance of the residential properties.
32. View 3: A4089 bridge over the railway (west pavement), looking south-west towards the application site. This view is considered to be of low value as it is without any special interest and would be experienced by road users and commuters. The proposed building would be set above the existing tree line, introducing an additional scale to this section of the view. However, this is a transitional view, experienced by those walking towards the town centre, and would be read in context with the existing height and massing seen along the High Road. The height is located in an area where the viewer would expect to see height, reflected in the site allocation policy designations. This would be further understood when considering the outline of the extant consent at No. 6 St. John's Road.
33. View 4: St. John's Road (west pavement), looking south-east towards the application site. This view is experienced by road users and local residents and is considered of low value as it has some amenity value for residents but is without any special visual interest. The proposed building would introduce an uplift in scale and massing when compared to the existing view. However, it would be seen within the context of the taller buildings set along the High Road and is reflective of the emerging character as set out in more detail above. Furthermore, the view demonstrates how the double height ground floor colonnaded entrance would appear in the street, creating a strong building line and a greater level of street activation. The two storey colonnades also help to relate the base of the building to the existing terraced housing in this area.
34. View 5: St. John's Road (west pavement), looking south-east towards the application site. This view is experienced by road users and local residents and is considered of low value as it has some amenity value for residents but is without any special visual interest. The proposed building would add an

additional sense of scale and massing to the eastern side of St. John's Road. However, this would be of a similar impact to the Wembley Central Square building which sits on the other side of the road. Furthermore, when considering the approved scale within the extant consent at No. 6 St. John's Road, the building would act as an appropriate visual transition to the taller emerging character along the High Road.

35. View 6: King Edward VII Park (east), looking south towards the application site. King Edward VII Park is a locally listed park (non-designated heritage asset). The view is considered of medium value as it is an area of open green space experienced by those using the park. The proposed development would sit behind the existing tree line to the south of the park, thereby limiting views of the building. Whilst there would be glimpses of the proposal through breaks in tree foliage, this would not be dissimilar to views of other existing buildings, which are closer in siting to the park. The proposal would also be set at a lower height to these. As such, the impact would be negligible, and it is considered that there would be no harm on the significance of the heritage asset due to distance and/or intervening development in the setting of the assets.
36. View 7: King Edward VII Park (north-west corner), looking south-east towards the application site. The view is considered of medium value as it is an area of open green space experienced by those using the park. The proposed development would be visible in its upper parts from this location which does not benefit from significant tree cover. However, the extent of building visible would be limited, and would sit within the context of the existing mid-rise character in this location. Due to the distance and intervening development, it is considered that there would be no harm on the significance of the heritage asset.
37. View 8: High Road, looking east towards the application site. The view is considered to be of low value as it is a general townscape view which is experienced as a transient view as the user moves along the road. The proposed building would sit behind an existing line of trees, and views would be marred. When seen in glimpses through the trees, the building would be seen as an appropriate transition to the High Road character, with particular regard to the Uncle Wembley development.
38. The assessment has demonstrated that there would be minimal impacts on views of medium value within the surrounding area. Whilst the building would be more noticeable in more short distant views within the immediate locale, it would be seen within the context of other existing and emerging buildings within the closely located town centre and tall buildings zone.
39. The submitted TVIA is considered to be robust and demonstrates that the proposal would be seen within the context of other tall buildings along the High Road, and it is therefore considered there would be no significant harm to the locality.

Impact on Protected Views

40. The application site lies within the Wembley Stadium Protected view: Horsenden Hill. Local Plan policy BHC2 states that development must not be to the detriment of the protected views of the National Stadium Wembley. An indicative view from this viewpoint was requested and received during the course of the application. The development would sit within the context of the high-rise buildings along Wembley High Road, and would not impact upon views of the Wembley Arch.

Architecture and Materiality

41. SPD1 states that the use of durable and attractive materials is essential in order to create development that is appealing, robust and sustainable and fits in with local character. Developments should also have a clear base, middle, and top.
42. As noted above, the surrounding area is generally comprised of traditional residential properties and high-rise buildings along the High Road. Externally, the façade composition would reflect the historic urban grain defined by the existing terraced houses along St John's Road and Elm Road, and integrates this into a clearly legible base, middle and top to the building, with a crown on the corner tower. The facade composition follows the typical architectural hierarchy and rhythm where larger groups of windows and colonnades are at the base. This allows for a strong sense of active frontage which is a key design consideration of Policy BSWA10. The use of reconstituted stone finish provides a high quality and distinctive active frontage along the ground floor that would complement the buff brickwork above. The double height stone colonnades at the junction of St. John's Road and Elm Road would create a strong corner streetscape presence and addresses its prominent corner location. The transition blocks respond to the rhythm of the terrace houses with prominent stone lintels and white bands.

43. The mid-section has an organisation of regular gridded openings to create a legible streetscape and the upper floors transition to a colonnaded crown for a distinctive roofscape and reduces the sense of mass at the top. The long massing of the wing blocks has been further broken down which is considered to respond to the clear pattern of the block widths fronting Elm Road and St. Johns Road.
44. The use of buff bricks is an appropriate choice on the hotel along the junction of St. Johns Road and Elm Road. A strong repetition of windows in a contemporary manner further accentuates and reflects the local character.
45. A condition would require samples of the materials to be reviewed and approved by officers, to ensure that a high-quality development would be delivered. Details of indicative technical sections illustrating how specific elements of the façade are to be constructed, including typical windows, typical parapets, typical balconies and soffits would also be required.

Layout and Quality of Accommodation

46. The proposed aparthotel would provide 318 rooms overall with various ancillary rooms and functions. Access to the reception area would be via a set of revolving doors fronting on to Elm Road, with access to the building's lift core in close proximity. Each lift core would facilitate disabled access. The main entrance area is considered to be well read, located on the corner of the development and, by virtue of its double heighted ceiling, would provide a strong sense of arrival to visitors. There would also be three smaller entrance points along St. John's Road, which would provide access to the Flexible F1/F2 space and the back of house area. From the main reception/café area, wheelchair friendly access would be provided to the 17 ground floor rooms. Aside from the proposed lifts, four stair cores would be provided across the building layout, with a smaller staircase serving the basement level of the F1/F2 space. There would also be a wheelchair accessible lift, and it is considered that the proposed lightwells would provide a good level of daylight to this space.
47. Otherwise, access to the basement level would be provided by each of the three lifts proposed, and three of the four staircases proposed. The access points are considered to be within convenient locations for suitable access to all parts of the building. A corridor system at basement level would provide access to 18 further rooms, as well as some more back of house facilities, the cycle store and the plant/services.
48. Access to the landscaped lightwell would be via rooms 05 and 14a, which the applicant has confirmed would be for maintenance purposes only.
49. An area prioritised for servicing would be located to the northern end of the building and would be linked via an internal door and corridor to the linen store and café, whilst also adjoining a relocated refuse store on the ground floor, so is conveniently located in relation to the parts of the building that would require servicing.
50. The building's first floor would feature a similar footprint to the ground floor, although would be cut off to the south-western corner to allow for a double-heighted entrance at ground level. Access would be provided to 29 further rooms, with a Linen room also provided to allow for ease of servicing.
51. At second to sixth floors, the footprint would remain similar, providing access to 38 further rooms and an associated Linen room. The additional rooms would be located to the south-western corner. At second floor level, rooms 01-09 would benefit from sliding doors each with access to a private balcony area.
52. At seventh and eighth floor levels, the building would begin to taper in at its northern and eastern portions, providing a reduced footprint with access to 24 rooms. Rooms 01-06 on the seventh floor would benefit from sliding doors with external access to a private balcony. Three areas prioritised for a green roof would be incorporated, with appropriate access provided from the corridor for maintenance purposes. At ninth and tenth floor level, the building would taper in towards the central corner of the building further, providing access to 6 rooms. Further space for green roofs would be included as well as the building's roof plant.
53. A key feature of the internal layout is a central light well, which is approximately 20m x 14m in size, which allows light into the basement level rooms.
54. Each room would be double occupancy. The largest of the rooms would be the non-standard accessible

rooms which are shown to accommodate for disabled users through the provision of turning circles present in both the room and the accessible en-suite facility. The smaller more generic sized rooms identified as small standard rooms would measure approximately 14.6sqm and would have a small kitchenette and en-suite toilet and shower.

55. Every room proposed would have windows to allow for daylight, natural ventilation, and outlook from the front or rear, however, there are six rooms where the sole window would be conditioned to be obscure glazed, given the potential concerns regarding outlook onto the residential neighbouring gardens. There are also three rooms proposed within the basement which would have a very limited outlook onto the lightwell wall set approximately 2.6m away. Nevertheless, the arrangement of these rooms would continue to allow for a suitable level of daylight and within the context of the hotel offering of 318 rooms, is a very minor shortfall (2.8%). Furthermore, outlook provision is not a requirement for apart-hotel rooms. It should be noted that no windows are proposed to the northwest elevations which would rely on outlook over the site allocation (BSWSA10) or neighbouring properties along St. John's Road which is welcomed. Officers also note the significant improvement in terms of outlook provision from the extant consent which comprises a 5-storey basement and recent approval at 163-165 Edgware Road for an apart-hotel building, public house and co-working space (LPA Ref: 23/3365) which required 13 of the 152 rooms (8.5%) approved to feature obscure glazed windows.
56. It is also noted that there would be three windows at ground floor level which would directly face the Elm Road footpath. However, these would be setback from the edge of the footpath by approximately 4.83m and would be separated by a well-considered landscaping approach which would aid in retaining privacy.
57. Each room would have a double bed, with storage, a shower and toilet en-suite and a kitchenette facility. Inclusive access has been confirmed as integral to the design of the hotel. It has been confirmed that 10% (16) of the hotel rooms would be accessible in accordance with London Plan policy E10.
58. Overall, the proposed layout is considered to be acceptable with regard to the quality of the hotel accommodation that is proposed. It should be noted that this has been evaluated on the basis that the proposal would provide visitor accommodation for short term stays in line with the policies discussed above. The quality of accommodation would be considered to be poor if the development was used for the provision of longer-stay accommodation and the condition referred to within paragraph 11 (limiting stays to a maximum of 90 days) is also important to ensure that the quality of the hotel accommodation is acceptable.

Public Realm Works

59. Site Allocation Policy BSWSA10 states that the hotel development should positively address the street and should be designed in line with principles set out in planning application 18/4063.
60. Within the extant consent noted above, a financial contribution of £10,000 was secured for the planting of seven trees along the pavement outside of the application site. No trees were proposed along the site frontage within the application site however two freestanding planters were proposed around each lightwell.
61. Within the subject application, the proposed development would continue to be well set back from the site boundary in order to engender street-based activity. Within the red line boundary, nine trees are proposed along the site frontage. It is also proposed to plant two trees along St. John's Road and to replace the two existing street trees along Elm Road, providing a net gain of eleven new trees. A financial contribution of £16,000 would be secured via s106 agreement for the planting of the trees within the Brent public highway. A number of rain gardens are also proposed along the site frontage which are a positive move in terms of placemaking. Overall, the proposed public realm works are considered to be in accordance with the site aspirations.
62. It is noted that some comments have been received from residents with concerns over anti-social behaviour. The Metropolitan Police: Designing out Crime department were also consulted on the application who raised concerns with regard to the overhangs and undercrofts on the site frontage allowing for groups and individuals to loiter. However, these areas would be double height, allowing for a greater level of natural surveillance from areas along Elm Road, St. John's Road and Eccleston Place. They would also be generally open in character and would be overlooked by the building's active frontages. As noted above, the overall frontage design is considered to be a positive move with regard to placemaking and Officers do not share these concerns raised. Details of CCTV locations would also be secured within the landscaping condition attached.

63. Security rated recommendations (doors, windows, etc.) have also been passed on to the applicant however are not material to the determination of this planning application.

Impact on Neighbouring Residential Amenity

Separation Distance and Privacy

64. Any development is required to maintain adequate levels of privacy and amenity for existing residential properties, in line with the guidance set out in SPD1. SPD1 recommends that directly facing habitable room windows will normally require a minimum separation distance of 18m, except where the existing character of the area varies from this. A distance of 9m should be kept between gardens and habitable rooms or balconies.
65. The eastern wing of the development proposed would be set directly adjacent to the joint boundary with No. 13 Elm Road, which is in character with the existing arrangement. Furthermore, no directly facing windows are proposed within 9m of this flank, and the neighbouring property does not contain any flank windows due to its existing terraced nature. As such, there would be no unduly detrimental impact upon the privacy of this property.
66. The northern wing of the development proposed would be set directly adjacent to the joint boundary with No. 14 St. John's Road. However, no directly facing windows are proposed within 9m of the boundary. As such, there would be no unduly detrimental impact upon the privacy of this property.
67. The northern wing of the development proposed would be sited within 9m of the rear garden of No. 1 St. John's Close. However, this portion of the building would contain no directly facing windows. The application also proposes a projection to the rear of the northern wing, which would be within 9m of each of the gardens along Nos. 1-4 St. John's Close. At ground floor level, there would be four facing windows which would be within 9m of the rear garden boundaries. However, by nature of their ground floor location, any sense of overlooking would be mitigated by the existing boundary treatment. A landscaping condition would also be included requiring details of boundary treatment to be retained/proposed. At first to sixth floor level, there would be six north-west facing windows which would be within 9m of the above noted rear gardens. A condition requiring these windows to be obscure glazed would be included with any consent to ensure this does not result in overlooking. Otherwise, the remaining windows have been designed to be inset from the main building facades to ensure appropriate separation levels are achieved.
68. It is also noted that there are a number of green roofs within 9m of adjoining neighbouring boundaries. However, these would be accessible for maintenance only and as such, there would be no rise to overlooking, given the infrequent access to this green roof.

Outlook and Sense of Enclosure

69. The building envelope of the proposed development should be set below a line of 30 degrees from the nearest rear habitable room window of adjoining existing property, measured from height of two metres above floor level. Where proposed development adjoins private amenity / garden areas then the height of new development should normally be set below a line of 45 degrees at the garden edge, measured from a height of two metres. SPD1 further highlights the 1:2 rule for two storey extensions for commercial developments next to residential as well as between residential developments applies.
70. The eastern wing of the development proposed would project beyond the rear wall of No. 13 Elm Road by approximately 0.85m and would therefore need to be set away from the midpoint of the nearest habitable window by 1.7m. The rear of the outrigger benefits from a ground floor bay window which is noted to be the nearest window, and likely to serve a habitable space. Based on the drawings provided, the development would be set approximately 2m from the midpoint of the bay window and complies with the 1:2 rule in this regard. Otherwise, it is noted that due to the six-storey height on this wing, the development would fail to comply with the 45-degree rule when taken from the rear garden of No. 13. However, in terms of outlook, the building would only project alongside the garden by 0.85m, and the garden would continue to benefit from strong levels of outlook to its rear and flank. The minor divergence is therefore considered acceptable in this instance.
71. The western wing of the development would project approximately 5.45m beyond the rear building line of No. 14 St. John's Road and would be set approximately 12.6m away from the flank wall at its deepest

portion. The application complies with the 1:2 rule in this regard. Planning permission was granted in 2022 for the conversion of this property into two self-contained flats, including the subdivision of the external amenity space on site (LPA Ref: 22/1723). Both the existing and proposed layouts approved under this application demonstrate that the flank windows contained on the neighbouring property do not serve any habitable rooms and therefore the 30-degree measurement is not required. Furthermore, the eastern portion of the site comprises communal amenity space, and therefore does not require testing in accordance with the 45-degree guidance which relates to private gardens. Nevertheless, given the six-storey height on this wing, the development would be in breach of the 45-degree rule (approximately 17.5m above the 45 degree line) when taken from the private amenity space serving the ground floor flat to the rear.

72. The northern wing of the development would also project alongside approximately half of the rear boundary at No. 1 St. John's Close. The six-storey rear projection would project alongside the gardens of Nos. 2-3 St. John's Close. A section drawing was provided during the course of the application which demonstrates that the development would be in breach of both the 30 and 45 degree angles when measured from these properties (approximately 13.6m above the 30 degree line and 18.71m above the 45 degree line).
73. Whilst the divergence from guidance is noted with regard to Nos. 1-3 St. John's Close and No. 14 St. John's Road, some breaches of guidance would be expected in an urban, edge of town centre location within a growth area and site allocation (which identifies an expected character of 5-6 storeys in height). In this instance, the proposed development would not prejudice potential development on neighbouring sites in line with the objectives of the site allocation policy for residential-led development. This is also reinforced by the omission of flank facing windows on the northern elevations of the proposed building. Noting the public benefits of the scheme, which include the improvement of the public realm, the divergence in guidance is considered to be acceptable in this instance. The four properties for which SPD1 guidelines are breached, as well as all other properties, have been examined for precise daylight and sunlight impact and this harm is considered in the context of the impact discussed above. This is discussed later in the report.

Daylight and Sunlight

74. Where buildings would be within a 25-degree line of existing windows, the Building Research Establishment considers that levels of light to these windows could be adversely affected and recommends further analysis of the impacts. A more detailed assessment of daylight and sunlight impacts based on the BRE's Site Layout Planning for Daylight and Sunlight (BRE209) 2022 guidance is required where the 25-degree test is not met. This guidance supersedes the 2011 version, however the advice in relation to assessing the impact on neighbouring properties remains consistent with the earlier version.
75. In support of the application a Daylight and Sunlight Report has been submitted, which assesses the effect of the proposed development on surrounding properties as well as within the proposal itself (discussed above).
76. In terms of impacts on daylight and sunlight to neighbouring properties, BRE Guidelines recommend two measures for daylight. Firstly, the Vertical Sky Component (VSC) assesses the proportion of visible sky and is measured from the centre of the main window. If this exceeds 27% or is at least 0.8 times its former value, residents are unlikely to notice a difference in the level of daylight. In addition, existing daylight may be affected if levels of No-Sky Line (NSL) within rooms are reduced to less than 0.80 times their former values.
77. In respect of direct sunlight and overshadowing, the 2022 BRE guidance recommends that a space should receive a minimum of 1.5 hours of direct sunlight on a selected date between 1st of February and 21st of March with cloudless conditions. It is suggested that 21st March (equinox) be used for the assessment.
78. To assess impacts on sunlight to existing south facing windows and amenity spaces, assessment of Annual Probable Sunlight Hours (APSH) is recommended. Adverse impacts occur when the affected window receives less than 25% of total APSH including less than 5% in winter months and that the amount of sunlight, following the proposed development, is reduced by more than 4%, to less than 0.80 times its former value.
79. The BRE guide defines criteria by which to assess the impact of a proposed development on open

spaces using the sunlight amenity test. This test quantifies the area of each space that receives at least two hours of sunlight on the 21st of March, in both the existing and the proposed situations. The 21st of March is chosen as it represents the mid-point of the sun's position throughout the year (equinox). The guidance suggests that, for a space to appear adequately sunlit throughout the year, at least 50% of its area should receive two or more hours of sunlight on the 21st of March. If the space fails to meet the above, then the area receiving at least 2 hours of sunlight should not be reduced to less than 0.80 times its former area.

80. However, the BRE also recognise that different criteria may be used in dense urban areas where the expectation of light and outlook would normally be lower than in suburban or rural areas, and the NPPF also supports a flexible approach to applying standards in order to make efficient use of sites. Where existing buildings have windows close to the site boundaries, the BRE suggests that a new building of similar height and proportions could be assumed in order to derive 'mirror image' target values for VSC. Where the proposed development would affect other newly consented developments, the impact on the Average Daylight Factor (ADF) achieved for those developments can also be used as an alternative means of assessing the impact of the proposed development.
81. Officers are satisfied that the report successfully identifies all neighbouring properties which could be affected by the proposed development, which are summarised as follows:
82. The assessment has considered all the closest neighbouring residential properties with windows overlooking the proposed development which are:

14 St. John's Road
1-4 St. John's Close
13-17 (odd) Elm Road
27 St. John's Road
31-55 (odd) St. John's Road
10-14 Elm Road/492-498 High Road

14 St. John's Road

83. This property is located to the north of the site and has been extended in the last 2-3 years. The site facing windows in the new flank elevation of the property serve bathrooms and a W.C which is confirmed within the approved drawings for 22/1723. As such, they are not material for assessment.
84. Otherwise, all of the front and rear facing windows meet the VSC and NSL targets, ensuring that the habitable spaces would continue to have adequate levels of daylight amenity and would not be noticeably affected by the proposal.
85. In relation to sunlight, the effects on the windows to the front of the property which are south-west facing fully accord with BRE APSP guidance. As the windows to the rear of the property are not orientated within 90 degrees of south, they are not material for assessment.
86. Overall, the proposal is not considered to have a noticeable impact upon the daylight and sunlight of the property.

1-4 St. John's Close

87. These terraced houses are located to the north of the application site, with rear gardens facing the proposed development. 33 windows and 10 rooms were identified as being potentially affected and were tested for daylight impact.
88. Of the 33 windows tested, only 2 rooflights contained within the ground floor rear extension of No. 4 St. John's Close would meet the VSC targets, with larger reductions generally experienced at ground floor level. Of the 10 rooms measured, only 2 would meet NSL targets.
89. 9 windows were identified for assessment at the rear of No. 1 St. John's Close. Of these, 5 are located below a non-original canopy feature to the rear, which restricts existing VSC scores to between 0.3 and 12.7. Therefore, whilst the resultant reductions to these windows would be greater than the 20% guideline, the reductions are accentuated by the existing low values. As such, it is difficult to avoid such an impact, due to the presence of the existing canopy. Otherwise, the remaining windows would experience VSC reductions ranging from 47.7% to 66.7%, with retained VSC levels ranging from 10.9%

to 15.8%. Furthermore, NSL reductions would range from 41.4% to 88.1%.

90. 9 windows were identified for assessment at the rear of No. 2 St. John's Close with VSC reductions ranging between 37.2% and 81.2%. In terms of retained levels, the central pane of the upper floor bay window would retain a 16.6% VSC. NSL reductions would range from 13.2% to 61.8%.
91. 7 windows were identified for assessment at the rear of No. 3 St. John's Close with VSC reductions ranging from 29.8% to 68.1%. It is noted that the ground floor of the property benefits from a 2.5m deep single storey rear extension as approved under planning application 02/2624. Whilst the retained values ranging from 9.6% to 13.8% at ground floor level are relatively low, Officers note that the level of such impact is worsened by the erection of this extension within a relatively shallow garden, and as a result of the impact of the deeper, neighbouring extension at No. 4. Otherwise, the central pane of the upper floor bay window would retain a VSC value of 18.9%. NSL reductions would be 33.1% and 34.2%.
92. 7 windows were identified for assessment at the rear of No. 4 St. John's Close including two rooflights on the property's 6m ground floor rear extension (LPA ref: 15/1768). Both ground floor rear windows would experience reductions of 53.2% and 52% with resultant levels 14.1% and 16.1% respectively. Whilst this is a shortfall against guidance, both rooflights would retain VSC values of 74.5% and 75.4% which significantly exceeds targets. At first floor level VSC reductions would range from 24.2% to 65.4% with the central pane of the bay window retaining a value of 20.4%. In terms of NSL, the ground floor kitchen within the rear extension would retain a value of 0.8x its former whilst the upper floor room would experience a minor shortfall in reduction of 24.2%.
93. Whilst there would be noticeable impacts to these properties (particularly Nos. 1-3 St. John's Close) it is noted that the affected properties are dwellinghouses that would only experience impact to their rear-facing windows and rooms and would continue to benefit from unaffected outlook to the front. Furthermore, as with the properties to the west, these properties are all within the BSWSA10: Elm Road site allocation and an aspiration for redevelopment of this area is set out within policy. Whilst the impact to these properties as existing is a material planning consideration, the designation sets an expectation of intensification for this area, and as such, with the degree of compliance with BRE guidance typically being much lower where built densities are higher. The impacts to these properties must be weighed against the regeneration benefits of the scheme, and a flexible approach should be applied in judging the impact as prescribed in the NPPF. This judgement is discussed below.

13-17 (odd) Elm Road

94. These properties comprise terraced houses to the east of the application site.
95. Of the 16 windows assessed, 13 of these would meet VSC targets (81%). Where targets are not met, these windows form the site-facing pane of the ground floor bay windows at each property measured, with the remainder of the bay window meeting targets. The minor shortfall in targets is therefore acceptable in this instance. Furthermore, all windows meet NSL targets. The habitable spaces would therefore continue to benefit from adequate levels of daylight amenity and would not be noticeably affected by the proposal.
96. In relation to sunlight, the rear facing windows are not orientated within 90 degrees of due south and are therefore not material for assessment.
97. Overall, the proposal is not considered to have a noticeable impact upon the daylight and sunlight of these properties.

10-14 Elm Road / 492-498 High Road

98. This property is located to the south of the site and contains residential accommodation at upper levels.
99. Of the 47 windows assessed, 46 of these would have a VSC value of 0.8x the former value. Whilst one window would have a 21.3% reduction, it would retain a VSC value of 30.1%, which meets guidance. Furthermore, all windows meet NSL targets. The habitable spaces would therefore continue to benefit from adequate levels of daylight amenity and would not be noticeably affected by the proposal.
100. In terms of sunlight, none of the facing windows are within 90 degree of due south and are therefore not material for assessment.

101. Overall, the proposal is not considered to have a noticeable impact upon the daylight and sunlight of the residential accommodation contained within this building.

27 St. John's Road

102. This property, which contains residential accommodation above a shop, is located to the south-west of the site.

103. The property contains one window on the front façade and no windows on the flank. The front window would have a VSC reduction of 29.7%, with a retained value of 24%. Whilst these values fail to comply with guidance, the minor shortfalls are considered to be acceptable within this urban location and site allocation which expects an emerging, mid-rise character.

104. In terms of sunlight, the window is not within 90 degree of due south and is therefore not material for assessment.

31-55 (odd) St. John's Road

105. These properties comprise terraced houses to the west of the application site.

106. Of the 91 windows tested, 58 would fail to meet VSC targets (64%). However, 8 of the windows to which the VSC impact is likely to be noticeable are secondary bay-window panes to habitable rooms and it is also noted that W2/121 of No. 39 is obscure glazed and appears to serve a bathroom. As a result, 49 windows (54%) would likely be impacted to a noticeable extent, where that impact is to a primary habitable room window of a dwelling. Of these remaining windows, 24 are side panes serving the front bay window of these windows which, due to their size and orientation at a right angle away from the central pane, have existing low VSC levels and are unlikely to receive noticeable impacts. As such, it is considered that 25 windows (27%) would likely be impacted to a noticeable extent, with these generally forming the front bay-window panes and first floor bedroom windows on the properties between 31-47 Elm Road. The central pane of the bay windows for these properties would retain values ranging from 11.8% to 25% whilst the single bedroom windows would retain values ranging from 10.9% to 23.2%, containing an adverse to minor adverse impact. In terms of NSL, 18 of the 39 rooms tested meet BRE guidelines, with greater impacts experienced by Nos. 31-43 St. John's Road (losses between 27.7% and 65%). It is however noted that one of these rooms at No. 39 appears to serve a bathroom.

107. In terms of sunlight, none of the facing windows are within 90 degree of due south and are therefore not material for assessment.

108. Whilst there are some instances of noticeable impact to these properties, it is noted that the affected properties are dwellinghouses that would only experience impact to their street-fronting windows and rooms and would continue to benefit from unaffected outlook to the rear. Furthermore, as with the properties to the north, these properties are all within the BSWSA10: Elm Road site allocation and an aspiration for redevelopment of this area is set out within policy. Whilst the impact to these properties as existing is a material planning consideration, the designation sets an expectation of intensification for this area, and as such, with the degree of compliance with BRE guidance typically being much lower where built densities are higher. The impacts to these properties must be weighed against the regeneration benefits of the scheme, and a flexible approach should be applied in judging the impact as prescribed in the NPPF. This judgement is discussed below.

6 St. John's Road (Consented Development - LPA ref: 21/4155)

109. Of the 242 windows tested, 22 windows would experience a VSC reduction of more than 0.8x their former value or under a total value of 27%. However, the windows that would experience reductions of more than 0.8x their former value are those located in recessed locations or under balconies. The lowest level residential windows in the main site facing elevation would also all retain VSC values in excess of the default BRE target of 27% after development. This neighbouring consent would therefore retain very good access to daylight should the subject development be built.

110. In terms of NSL, reduction to all except 2 bedrooms fully accord with default BRE guidance. Both of these bedrooms are recessed behind balconies, restricting their access to daylight.

111. In terms of sunlight, none of the facing windows are within 90 degree of due south and are therefore not material for assessment.

Overshadowing to Outdoor Amenity Spaces

112. The application has considered the impact of development on the outdoor amenity spaces to the north and east of the site. The relevant amenity spaces which are closest and which would warrant overshadowing testing is the rear gardens of 1-6 St. John's Close and 13-21 Elm Road. An addendum Daylight Sunlight Assessment was also requested and received during the course of the application to test the impact of overshadowing on the rear gardens of 14-16 St. John's Road. It is noted that the garden to the rear of No. 16 St. John's Road has been subdivided to provide a private amenity space for the ground floor flat, and a communal amenity space for the remaining residents.
113. The BRE overshadowing assessment is passed where at least 50% of the garden area would retain exposure to at least 2 hours of direct sunlight on 21st March.
114. Of the 14 gardens measured, 4 would meet BRE guidelines (19-21 Elm Road and 5-6 St. John's Close). Of the remaining gardens, No. 4 St. John's Road would receive at least 2 hours of sunlight on the 21st of March to 49% of its garden and this minor shortfall is negligible.
115. For the remaining gardens, the 2-hour sun on ground test was also modelled on 21st June, which Officers note is when these spaces are more likely to be used given the urban context. On this day, only the communal amenity space to the flank of No. 14 St. John's Road would fail to receive at least 2 hours of direct sunlight to 50% of its area (40%). The remaining gardens would perform strongly, ranging from 68% to 100%.
116. Whilst there are some instances of noticeable impact to these gardens on the 21st March, it is noted that the gardens would perform strongly within the summer months, and this is considered acceptable within the urban, edge of town centre context. Whilst the impact to these properties as existing is a material planning consideration, the designation does set an expectation of intensification for this area, and as such, with the degree of compliance with BRE guidance typically being much lower where built densities are higher. The impacts to these properties must be weighed against the regeneration benefits of the scheme, and a flexible approach should be applied in judging the impact as prescribed in the NPPF. This judgement is discussed below.

Summary

117. Overall, while there are a number of windows and gardens which do not achieve BRE guidelines, the scheme provides a generally high compliance with BRE guidance as a whole, and these results are considered to be acceptable given the context of the proposal that is located close on the edge of a town centre and tall building zone, within a growth area, and within a site allocation policy which expects a development character of 5-6 storeys. It is also worth setting out that the NPPF highlights a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site.
118. The properties that are mainly affected currently afford outlook over the existing low scale existing buildings on site. The overall benefits of the development which seeks to optimise the use of this underused brownfield site, including the delivery of new community use space would outweigh the limited harm identified above.

Transport and Highway Considerations

Car Parking

119. Car parking allowances in Brent are set out in Appendix 4 of the Local Plan. This allows only disabled and operational parking to be provided for hotels with good access to public transport services, whilst any parking for the community hall would need to be justified through the Transport Assessment. The absence of any proposed parking for the development therefore accords with standards, whilst disabled Blue Badge holders would be able to use nearby on- and off-street parking bays in the area. The adjoining roads are noted as being not heavily parked at night.
120. The operation of a Controlled Parking Zone (CPZ) in the area would deter car-borne staff and visitors 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 would again also help to minimise car trips to the site. As

such, the proposed absence of car parking provision is acceptable.

Coaches and Taxis

121. The parking standards for hotels also require a coach parking space for every 75 bedrooms, giving a requirement for four spaces for this extended hotel. However, the proposed use is an apart-hotel, which includes larger rooms with cooking facilities intended to attract longer-stay customers such as families or long-stay business trips. The applicant states that such visitors are therefore less likely to be arriving in large groups by coach and that any group bookings that are received (i.e. above 20 guests) would be advised that the hotel cannot accept coach parties.
122. 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 does suggest that there is very little, if any, demand for coach parking for such businesses.
123. As such, it would be acceptable for the coach parking requirements to be relaxed, as long as strict planning conditions are applied to the consent to limit its use to an apart-hotel only (and not a general hotel) and to prohibit the booking of coach parties at the hotel.
124. Taxis can also be expected to set down and collect visitors, but no off-street area is proposed for this. The applicant has stated that this may take place within the off-street servicing area when no deliveries are expected however it is acknowledged that taxis would unlikely use this area in practice. Nevertheless, the application would require the reinstatement of the redundant vehicle crossovers along St. John's Road, and the resultant kerbside space freed up for extra parking bays would provide space for the safe pick up and drop off of customers.

Bicycle Parking

125. Policy T5 of the London Plan dictates that seven short-stay bicycle parking spaces for guests and sixteen long-stay spaces would be required for the apart-hotel element of the proposal. In addition, two long-stay and two short-stay spaces are required for the F1/F2 space.
126. Four bicycle stands (eight spaces) are proposed along the Elm Road frontage and in close proximity to the main entrance, which is noted to provide a good level of natural surveillance. A further stand (two spaces) has also been proposed in front of the F1/F2 space, and the overall provision therefore satisfies the short-term requirement.
127. A basement store with sufficient space for 17 bikes on two-tier stands, Sheffield stands, and a large bicycle stand is also proposed. Whilst this would be one space short of the long stay requirements, the mix in provision and additional short stay space is considered to overcome this minor shortfall. These spaces would also be accessed via a suitably sized lift.

Servicing

128. Servicing by 8m rigid vehicles is required for the aparthotel under the standards set out in Appendix 5 of the Local Plan. Amendments were sought and accepted during the course of the application to allow for servicing provision on-site, in accordance with Policy T7 of the London Plan. The incorporation of an enclosed loading bay (4m x 11.5m) with a 4.1m headroom accessed via a widened 7m wide crossover from St. John's Road (also serving an electricity substation) is welcomed and in accordance with the objectives of Policy T7.
129. The loading bay would be linked via an internal door and corridor to the linen store and café, whilst also adjoining the relocated refuse store on the ground floor, so is conveniently located in relation to the parts of the building that require servicing.
130. To accommodate the swept paths of delivery vehicles, it is proposed to relocate the two on-street parking bays along the St. John's Road frontage further southwards, which is acceptable. Given that the existing crossover to the hotel would also become redundant, there would be scope to provide an additional on-street parking bay or two and these matters would be secured via condition.
131. A Delivery & Servicing Management Plan (DSP) has been submitted with the application to help to manage future deliveries. In terms of delivery vehicle frequency, the plan states that eight weekly deliveries are currently received each week by transit vans for the existing 65-bed hotel, plus six

collections of refuse. It is suggested that that the proposed aparthotel would generate a similar number of deliveries to the previously consented 226-bed scheme. Otherwise, delivery vehicle movements would be pre-planned with 20-minute delivery slots. A full DSP would be secured prior to first use of the building via condition to contain detail on the measures that would be implemented to ensure that delivery and servicing is carried out in accordance with the Mayor's Vision Zero principles.

Trip Generation

132. Policy T4 of the London Plan states that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.
133. A revised Transport Assessment was submitted during the course of the application which considers the multi-modal trip generation of the 318 rooms proposed. The predicted trips have been based upon survey data of the nearby Best Western Hotel on Wembley High Road which, whilst not an apart-hotel, is highly representative in terms of location (PTAL 6 and within 400m of the application site). The Best Western hotel also has very little on-site parking, so is suitably comparable with this car-free proposal. This approach was also accepted in the assessment of the extant consent which was for 226 aparthotel rooms.
134. Applying the results to the proposed 318 room aparthotel, the assessment suggests that the development would generate 20 two-way vehicle movements in the morning peak hour (8-9am) and 57 two-way vehicle movements in the evening peak hour (5-6pm). Daily two-way vehicle movements have been estimated at 582 which is not of a significant level to have any significant impact on local highways. Furthermore, in practice, it is noted that the car free development would likely generate a slightly lower level of vehicular traffic, with most vehicle trips comprising disabled guests driving to the hotel. This is because the sample study of the Best Western Wembley Hotel provides some dedicated on-site car parking.
135. In terms of modal share, car driver/passenger trips would account for 13% of trips and taxi journeys for 8%. For other modes, approximately 66% of trips would be by public transport and 11% by foot. For the public transport trips, this would equate to 43 trips by rail/Underground in the morning peak hour (8-9am) and 120 trips in the evening peak hour (5-6pm). This would amount to an average of one extra passenger per rail/Underground service through Wembley Central, Wembley Park and Alperton/Sudbury Town, which is not considered significant enough to have any noticeable impact on capacity.
136. The estimated number of journeys by bus (5 in the morning peak hour and 15 in the evening peak hour) would be insignificant. However, noting the car-free nature of the scheme, Transport for London have re-distributed the extra vehicle trips predicted into sustainable and active modes. Based upon these, it is estimated that the development proposed would generate a total of 9 journeys by bus in the morning peak hour and 18 journeys by bus in the evening peak hour. The proportion of associated impact upon bus service provision would therefore be notable, and a bus service enhancement contribution figure of £117,000 would be secured via s106 as part of any consent.

Travel Plan

137. A "Framework" Travel Plan has been submitted for the hotel, This sets out a range of measures to be implemented by a Travel Plan Co-ordinator for both staff and guests (travel information on noticeboards, website etc., marketing and promotion, promotion of car sharing, Car Clubs etc.), with the aim of increasing the modal share by walking and cycling by 5% over five years and reducing the proportion driving by 10% over the same period. Based on the figures laid out within the Transport Assessment, it is suggested that the targets are to reduce the proportion of journeys to and from the site by car/van drivers to no more than 3% of trips by the third year of the Travel Plan and 2% by the fifth year.
138. The measures in the Action Plan could also be improved, notably through the provision of interest-free season ticket and bicycle purchase loans for staff and the provision of bicycles for rent for long-stay guests. Otherwise, progress towards meeting these targets will be monitored on a biennial basis over five years using fully funded i-TRACE/TRICS compliant surveys, with a review of progress towards the targets undertaken following each survey to identify any need for additional measures.

139. A final Travel Plan will need to be approved before the development is occupied and this would be secured via s106 Agreement.

Healthy Streets

140. Policy T2 of the London Plan states that development proposals should demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with TfL guidance, reduce the dominance of vehicles on London's streets whether stationary or moving and be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.
141. In line with Policy T2, an Active Travel Zone Assessment ('ATZ') has been undertaken and submitted as part of the Healthy Streets Assessment within the Transport Assessment. This includes a study on five routes from the site to nearby destinations, including High Road, Wembley Health Centre and Wembley Stadium, which are appropriate in scope. Further detail was sought during the course of the application to provide more commentary on potential improvements to each route as well as an hours of darkness/night time ATZ study also being undertaken. The suggested improvements include lighting, footway improvements, and better cycle infrastructure on each route, and in accordance with Policy T2.
142. One set of improvements that is referred to relates to the junction of St. John's Road, Elm Road and Ecclestone Court. In this case, a nearby mixed-use development at 6 St. John's Road (ref: 21/4155) has previously identified a pedestrian safety scheme involving the construction of a raised junction table and widened. Whilst this development benefits from planning permission, this has not yet come forward. Given that these improvements front the site, they are also required to make this development acceptable. As such, the construction of these works would also be secured through any planning consent for this hotel, to ensure the works are still constructed if the development at 6 St. John's Road does not progress. In the event that the works have already been commissioned in association with 6 St. John's Road before a material start is made to this development, then a financial contribution of £50,000 would be sought, either as a contribution towards those works or towards other active travel improvements in the vicinity of the site instead.

Construction Management

143. A Construction Management Plan has been submitted with the application. This anticipates the construction works taking 130 weeks to complete, with working hours to comply with standard practice of 8am-6pm on weekdays and 8am-1pm on Saturdays. Deliveries are proposed to be pre-booked within 45-minute delivery slots. They would be confined to 9am-5pm on weekdays to avoid peak hours, which would limit the number of deliveries to 39 per week. Deliveries would also not be booked within four hours of an event at Wembley Stadium, which is welcomed.
144. In terms of routeing, all vehicles would travel to and from the site from the North Circular Road via Harrow Road, Park Lane and Elm Road, before departing via St. John's Road and High Road, which is welcomed. For the initial works, loading would be undertaken off-street to the rear of the site, but for the final construction stage, deliveries would be made kerbside from Elm Road. This would require the suspension of parking bays and probable closure of the footway, so applications for this would need to be made to Brent's Highways Service. An informative is recommended to this effect.
145. Otherwise, banksmen would be employed on site to maintain safety and wheel-washing equipment would be provided to ensure mud is not carried onto the highway. Up to 15 staff are anticipated to be present on site at any time and with no parking to be provided, they would be expected to travel by public transport.
146. Overall, the Construction Management Plan is of a good standard, but would require final review and approval once a main contractor is appointed. Such details would therefore be secured via condition.

Basement

147. The development proposes a basement close to the highway boundary. An informative is recommended advising the applicant that they would require approval in principle (AIP) for the retaining structures around the site perimeter from the Local Highway Authority (i.e. Brent's Highways & Infrastructure Service) prior to the commencement of works. A time period of 8-12 weeks should be

allowed to obtain approval and further information can be provided upon request.

Environmental Health Considerations

Air Quality

148. London Plan SI1 seeks to tackle poor air quality and ensure development proposals do not lead to further deterioration of existing poor air quality. Policy BSUI2 of Brent's Local Plan requires all major developments within Growth Areas and Air Quality Focus Areas to be Air Quality Positive and elsewhere Air Quality Neutral.
149. The application is a major development in an Air Quality Focus Area and is therefore required to be Air Quality Positive. An Air Quality Assessment was submitted with the application which is of a sufficient technical quality to demonstrate that the development would be Air Quality Neutral for both building and transport emissions. An assessment of the potential impacts during the construction phase has been carried and shows that releases of dust and particulate matter are likely to occur during site activities. The risk of dust soiling impacts at neighbouring properties has been assessed as medium, with the risk to human health assessed as potentially low. Through good site practice and the implementation of suitable mitigation measures, the impact of dust and particulate matter releases may be effectively mitigated and the resultant impacts are considered to be negligible. Traffic generated by the proposed development is expected to be very limited and would not significantly affect local air quality, however detailed dispersion modelling of the local road network has been undertaken to assess whether the site is suitable for the aparthotel use, as proposed. The modelling indicates that both long and short term air quality standards are within the targets for commercial spaces as set by the Air Quality Standards Regulations 2010. The protection measures identified would be secured through a construction management plan which includes a dust management plan.
150. An Air Quality Positive Matrix was also requested and received during the course of the application. The information submitted demonstrates that the design and layout of the development has been considered to improve the dispersion of air pollution. The development would also be car free and would use of all electrical HVAC and DHW systems via heat pump systems. The information has been reviewed by Brent's Environmental Health Service who recommend no further conditions.
151. Overall, the site is considered suitable for use and there would be a positive impact on air quality. The proposed development therefore complies with the relevant local plan and London Plan requirements subject to conditions to secure mitigation measures set out above.

Land Contamination

152. The application has been accompanied by a Preliminary Risk Assessment which concludes that an intrusive site investigation is required. As such further information will be requested via condition to ensure safe development and secure occupancy of the site in the form of a site investigation setting out remediation options and a verification report to confirm that such remediation works have been carried out.

Noise

153. London Plan Policy D14 states that where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles. Proposals should manage noise by promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.
154. The applicant has submitted an RBA Acoustics External Building Fabric Assessment dated 02/08/2023. This assessment does recommend mitigation measures to ensure that internal noise levels within the hotel bedrooms can be achieved. A plant noise assessment is also included within the noise assessment to meet LB Brent guidance. Conditions securing the above would be included with any consent.

Construction Management

155. The application has been accompanied by a Construction Management Plan which does have controls to minimise noise and dust from the site during construction. However, it is also recommended

that on-site plant and machinery must comply with the London Non-Road Mobile Machinery (NRMM) Low Emission Zone standards for Opportunity Areas and this would be secured through condition.

Urban Greening, Biodiversity and Ecology

Urban Greening and Biodiversity

156. London Plan Policy G1 states proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network and London Plan Policy G4 supports the creation of areas of publicly accessible open space. Policy G5 requires major development proposals to contribute to the greening of London by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. The Major recommends a target Urban Greening Factor (UGF) of 0.3 for predominately commercial development. Local Plan Policy BGI1 supports meeting the UGF with emphasis on solutions to support biodiversity.
157. The applicant has calculated the Urban Greening Factor (UGF) score of the proposed development as 0.41, which exceeds the target set by Policy G5 of the London Plan.
158. The proposed development presents a well-considered approach to integrating green infrastructure and urban greening across the development which is supported. This includes the incorporation of roof top greening and rain gardens which support multifunctionality, in accordance with Policy G1. The management and maintenance of the areas will be subject to condition to ensure the spaces develop and thrive. Within the extant consent, some concerns were raised as to the successful cultivation of the lightwell courtyard trees, given its subterranean location. Since the approval of the extant consent, the adoption of the new London Plan requires a UGF score of 0.3. The UGF calculation provided with the subject application was based upon an earlier iteration of the scheme, which only accounted for six trees within the lightwell courtyard, and three trees along the site frontage. Even at this stage, the UGF target of 0.3 was exceeded. Since then, six further trees have been introduced to the site frontage, and the final UGF score, to be secured via condition, would achieve the policy target of 0.3. The scheme would be subject to a landscape management plan via condition and would further benefit from the planting of four new trees along the public highway.
159. London Plan Guidance on Fire Safety restricts the use of combustible materials in the external walls of a building, limiting the use of green walls. The proposed urban greening has been reviewed against this guidance and it is noted that no green walls are proposed, but rather two areas of climbers on the outside walls of the basement, which would not be connected to the building. The application is therefore acceptable in this regard and these matters would be secured via condition.
160. London Plan Policy G6 along with Brent Local Plan Policy BGI1 with set out that development proposal should aim to secure net biodiversity gain.
161. The application site is comprised entirely of sealed surface and buildings, and therefore the baseline biodiversity value for the site is calculated to be 0.00 biodiversity units. The landscaping improvements proposed would provide 0.35 biodiversity units and the application is therefore in accordance with the above policy context. Post-development, the site would be of benefit to a range of species which are discussed below and would be an improvement on the pre-development scenario. Detail relating to the proposed ecological compensation and enhancement actions in relation to habitat creation and management should be provided within an Ecological Management Plan (EMP) for the site which would be secured through planning condition.

Ecology

162. The existing landscaping ecology on site is relatively poor, with the majority of the land covered with hard landscaping and buildings. Nevertheless, the application has been accompanied by a Preliminary Ecological Appraisal, dated August 2023, which identifies value for a number of notable and protected species and habitats, including roosting bats and nesting birds. A single presence/likely absence survey for bats is recommended on two buildings, with a survey for nesting birds not considered necessary. Mitigation and compensation actions to minimise the disturbance of bats and birds are recommended, which include biodiverse living roofs to provide foraging opportunities, and bird and bat boxes. Any mitigation and enhancements for the site would be secured via the submission and approval of an Ecological Management Plan.

163. The application site is also located near to the Chiltern Line between River Brent and Sudbury Hill Harrow Site of Importance for Nature Conservation ('SINC'), identified as being of Borough Importance. In accordance with Policy G6 of the London Plan and BG11 of the Local Plan, the development should avoid impacts to the SINC. If avoidance of impacts is not possible, the application should set out how the mitigation hierarchy has been followed to minimise development impacts.
164. The Preliminary Ecological Appraisal states that there is the potential for construction impacts, including dust, vibration and noise pollution on the SINC. A Construction Environment Management Plan ('CEMP') which sets out how such impacts would be avoided and mitigated would therefore be required by condition.

Trees

165. Policy BG12 of the Local Plan stipulates that development with either existing trees on site or adjoining that could affect trees will require the submission of a BS5837 or equivalent tree survey detailing all tree(s) that are on, or adjoining the development site. In the case of major development to make provision for the planting and retention of trees on site. Where retention is agreed to not be possible, developers shall provide new trees to achieve equivalent canopy cover or a financial contribution for off-site tree planting of equivalent canopy cover will be sought. Replacement canopy cover will be measured as total canopy area of new trees at time of planting being equal to canopy area of existing mature trees proposed for removal.
166. Within the extant consent for this site, all 11 on-site trees were identified for removal. In place, 4 trees were proposed within the central courtyard woodland location and a financial contribution of £10,000 secured for the planting of 7 trees in front of the hotel on the public highway, totalling 11 new trees. Since the determination of this planning application, all of the previously existing on-site trees have been removed, and the site is entirely comprised of sealed surface and developed land.
167. The subject planning application incorporates the additional parcel of land to the north, containing the existing Spiritualist Church. The Arboricultural Report submitted with the application notes that the site is entirely clear of trees, and this was confirmed upon Officer site visit. Whilst historic imagery demonstrates that this additional area previously benefitted from tree coverage, these were not statutorily protected by a Tree Protection Order or by Conservation Area regulations. The proposal would include the planting of eighteen trees within the application site, with nine of these being along the frontage, providing significant landscape value. The proposed approach to tree planting is strong, and it is considered that this would be an improvement from the extant consent. As noted above, a financial contribution would also be secured for the replanting of the two street trees along Elm Road, and the planting of two further street trees along St. John's Road.
168. With regard to the impact of development on off-site trees, the area includes one Hornbeam (T3) and a street tree growing on Elm Road and a group of off-site Sycamore (G1) which have been assessed as category B in the Arboricultural Survey submitted. A Zelcova and Italian Alder (T1 and T2) are also growing in the street and have been assessed as category C trees. It was agreed during the course of the application for the removal of the T2 and T3, and a financial contribution provided for the planting and maintenance of two new trees in this area. This is discussed in more detail below. Otherwise, T1 would be protected by trunk hoarding during construction.
169. The proposed basement woodland/lightwell construction would require excavation within 16.2% of the RPA of the group of Sycamore trees (G1). The Tree Protection Plan submitted provides details of sensitive excavation within the RPA of this group, including cutting back cleanly any roots that are encountered. The above ground pruning would be carried out where the trees overhang the site, reducing the demand on the rooting system for water by the reduction of the canopy, reducing the impact of the excavation within the RPA.
170. The recommendations set out within the Tree Protection Plan submitted would be secured via condition, and a Hard and Soft Landscaping plan would be required to have maintenance of any onsite landscaping for a further 5 years.

Public Realm Landscaping

171. As noted earlier in the report, a £16,000 financial contribution would be secured for the planting of 2 new street trees along St. Johns Road and the replacement of the two existing trees outside of the Elm Road Frontage. Within the original submission, it was proposed to retain these trees and to plant a

tree on the corner of the Elm Road and St. John's Road. Brent's Landscape and Tree Officers noted the existing Elm Road trees to be large specimens which would easily spread to the windows of the new development, even with the pruning proposed. Furthermore, the T2 Alder is of poor health, with a large cavity in the bend of the trunk. This creates a weakness in the tree which could fail in the future. As such, their replacement was agreed. Furthermore, the corner street tree was removed due to highway visibility concerns.

Flood Risk and Drainage

Flood Risk

172. Policy BSUI3 of the Brent Local Plan highlights that proposals requiring a Flood Risk Assessment must demonstrate that the development will be resistant and resilient to all relevant sources of flooding including surface water. The application is accompanied by a Flood Risk Assessment. It sets out that the site lies entirely within Flood Zone 1 and would be at 'Very Low' or 'Low' risk of flooding from fluvial, tidal, sewer, infrastructure (reservoir) and ground water sources.

173. A number of flood resilience measures are proposed given the risk of surface water flooding (discussed below). The flood risk assessment has been reviewed by the LLFA who has confirmed that are satisfied with the finding of the report and the mitigation measures. Such details are recommended to be conditioned to any forthcoming consent.

Sustainable Drainage

174. Policy SI13 of the London Plan sets out that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the drainage hierarchy. Policy BSUI4 of the Brent Local Plan relates to on-site water management and surface water attenuation. It requires major developments to:

- a) use appropriate sustainable drainage measures to control the rate and volume of surface water run-off;
- b) ensure where feasible separation of surface and foul water systems
- c) make reasonable provision for the safe storage and passage of flood water in excessive events; and
- d) demonstrate adequate arrangements for the management and maintenance of the measures used.

175. A drainage strategy has been submitted with the application and revised in order to ensure compliance with Policy SI13. This follows the SUDs hierarchy and therefore employs the most suitable and practicable SuDS techniques to improve surface water run off rates from the site, which as existing discharges at a rate of 69.17 l/s for the 100 year event. The proposed discharge rate would be 2 l/s for the 100-year event plus 40% climate change. Although this is higher than the Qbar greenfield runoff rate of 0.4 l/s, given the site constrains and the betterment from existing conditions, this is supported and deemed to meet both the Local and National Policy.

176. The drainage strategy proposes to provide the required attenuation within a combination of blue roofs, permeable paving and below ground attenuation tanks, which is supported. A surface water pump is also proposed in the basement, where discharge is not possible by gravity. Therefore, pumping would be minimised as far as is practicable. Brent's Local Lead Flood Authority were also consulted on the application and raised no objections.

177. Thames Water were consulted on the planning application however a response was not received. Within the extant consent, Thames Water raised no objection with regard to surface water network infrastructure capacity or foul water sewage network capacity. This was also the case for the extant consent at No. 6 St John's Road (LPA Ref: 21/4155) which comprises a part 5, part 18 storey mixed use building containing 79 residential units and 166sqm commercial floorspace. As the extant consent on site involved a basement construction, an informative was added recommending the applicant to provide details on what measures would be undertaken to minimise groundwater discharges into the public sewer as part of the Groundwater Risk Management Permit to be applied for. Informatives were also requested to undertake appropriate measures for works within 15m of Thames Water underground assets and the installation of a positively pumped device to avoid the risk of backflow at a later date. The extent of basement has been reduced under the subject application and given the nature of development applied for, the same informatives would be added to the subject application.

Energy and Sustainability

178. All major developments are required to achieve zero carbon standards including a 35% reduction on the Building Regulations Part L Target Emission Rates achieved on-site, in accordance with the energy hierarchy set out in London Plan Policy SI2. An Energy Assessment is required, setting out how these standards are to be achieved and identifying a financial contribution to Brent's carbon-offsetting fund to compensate for residual carbon emissions. Ongoing monitoring and reporting of energy performance is also required under the 'Be Seen' part of this policy, and a whole lifecycle carbon assessment is required for applications referable to the Mayor. London Plan Policy S7 also requires a circular economy statement..
179. Planning applications for major development are required to be supported by a Sustainability Statement in accordance with Policy BSU11, demonstrating at the design stage how sustainable design and construction measures would mitigate and adapt to climate change over the lifetime of the development, including limiting water use to 105 litres per person per day. Major commercial floorspace is required to achieve a BREEAM Excellent rating and this also needs to be appropriately evidenced.
180. An overheating assessment is also required, to assess and mitigate the risk of high temperatures in residential units in accordance with London Plan Policy SI4, and Policy SI7 also requires a circular economy statement for applications referable to the Mayor.
181. The application has been accompanied by an Energy & Sustainability Statement which sets out details of how regulated carbon emissions would be reduced by 16.99% through energy efficiency ('Be Lean' measures) and by a further 20.25% by generating renewable energy on-site ('Be Green' measures). Measures proposed include heat pump technology and photovoltaic panels. The total reduction in emissions would be 37.23%, which meets and marginally exceeds the 35% policy target. The contribution to Brent's carbon offsetting fund is estimated at this stage to be £119,842.50 and would be secured through the s106 agreement together with updated energy assessments at detailed design and post-construction stages. The risk of overheating has also been assessed, and the report identifies that, subject to orientation and shading impacts, some of the hotel rooms would not comply with the industry standards. However, this is not an unexpected outcome for hotel in a high-rise location and the services strategy would be informed accordingly.
182. The proposal does not include any connection to a district heat network ('Be Clean' measures), as there is not an available network within the local area. However, the development would be expected to ensure that there is potential for future and this future connection would be secured by condition.
183. The Energy and Sustainability Statement also sets out how a BREEAM Excellent rating would be achieved for the development. As with all assessments at this stage, the assessment is predictive as it incorporates assumptions about how the detailed design, construction and operation stages would perform against BREEAM criteria, which cannot be confirmed at this stage. However, the targeted minimum score of 71.72% meets the 70% threshold for an Excellent rating, and this minimum rating is considered to be achievable on the basis of the information provided. Further evidence of the achievement of this rating would be required prior to occupation of the building.

Whole Life-Cycle Carbon and Circular Economy

184. A Whole Life-Cycle Carbon and Circular Economy Statement have been provided with the application. This includes a review of the existing buildings and their refurbishment potential. The existing building structure comprises of a row of five Edwardian terrace houses with various roof layouts and extensions. Due to their age, they are noted to be poorly insulated brick/block construction and have inflexible internal layouts which are not appropriate for retention/refurbishment and would have very little scope for upward extension in any practical manner. This would not make for efficient use of land within this edge of town centre location. As such, although the retention and refurbishment of existing buildings can be beneficial in terms of whole lifecycle carbon emissions, it is considered that this is unlikely to be the most sustainable solution in this case.
185. The Whole Life-Cycle Carbon assessment presents a quantitative analysis of the operational carbon emissions associated with the existing buildings and with the proposed building (the latter is based on the emissions predicted in the energy strategy discussed above), and the embodied carbon emissions associated with the manufacture, transport and construction activities required to create the new building. Emissions associated with maintenance, repair, replacement and demolition are also

considered. This process allows for the choice of materials and construction methods to be reviewed in the light of the potential to reduce the associated carbon emissions. This document has been reviewed by the GLA and subsequently revised to reflect their comments. A further assessment would be required post-construction, and this would be secured by condition.

186. A circular economy statement was also submitted, and subsequently revised in response to comments from the GLA. This covers issues including reuse of materials arising from demolition and remediation works, minimising demand for materials and enabling their reuse, managing waste on site and encouraging waste recycling, storage space and collection systems to support recycling and reuse. Further information is required on the reuse of materials during construction and the management of operational waste and these details would be sought prior to any decision.

Impacts of Microclimate and Reception of TV and Radio Services

Wind Microclimate

187. A Wind Microclimate Study was submitted and subsequently revised during the course of the application. This uses the Lawson Comfort Criteria, which is the industry standard defining how an average pedestrian would react to different wind levels. Wind speeds are categorised as being suitable for either sitting, standing, strolling or walking, or as uncomfortable for most activities. Developments should aim to provide at least strolling conditions along pedestrian thoroughfares, standing conditions at main entrances, drop off areas, taxi ranks and bus stops, sitting conditions at outdoor seating areas in the summer, and standing conditions in large public amenity spaces in the summer, with sitting conditions at designated seating locations. Finally, sitting or standing conditions should be achieved in summer on balconies and private amenity spaces - providing sitting conditions in summer would generally ensure that standing conditions could be maintained in winter. Strong wind thresholds requiring mitigation measures are also defined.
188. The assessment includes the consented No. 6 St. John's Road development (LPA ref: 21/4155) as part of the future surroundings. This approach is consistent with the approach taken to analyse daylight and sunlight impacts.
189. The results of the assessment show that the introduction of the No.6 St John's Road development would generally create safe wind conditions and ground level conditions which would be suitable for the intended use or consistent with the baseline conditions, following the implementation of mitigation measures. The mitigation measures proposed include the proposed trees within the site, and a 2m wide canopy above the ground floor of the building. The canopy proposed has been included within the proposed elevations and is considered to be of an acceptable appearance. The proposal would also create some localised improvements in wind conditions, to the off-site entrances along Elm Road, which would be more suitable for the intended use than at present. Conditions at the entrances, amenity areas and elevated levels would also be suitable for the intended use.
190. Following mitigation, it is identified that off-site entrances north of St. John's Road would remain unsuitable for the intended use. However, there are fencing and landscaping elements in front of these residential buildings which were not modelled within the analysis. The entrances to the buildings are also recessed, and it is therefore anticipated that wind conditions would be better in reality, with the assessment providing an absolute worst-case scenario. The resultant impact is considered to be commensurate with development of this form and such impacts must be balanced against the planning benefits of the proposal. As noted above, this does include improvements to the wind conditions at the off-site entrances along Elm Road.

TV and Radio Services

191. A Television and Radio Signal Survey & Reception Impact Assessment was submitted with the application. It is noted that the proposed development could cause reception degradation to digital terrestrial television receptors immediately adjacent to the north-west of the site. Interference to the reception of digital satellite television services in areas immediately north-west of the site could also occur whilst tower cranes during construction could result in minor and sporadic interference to existing satellite dishes. The assessment includes a range of mitigation measures to be implemented to ensure acceptable coverage, and these would be secured via condition as part of any consent.
192. With regard to radio reception, the proposed development is unlikely to adversely impact broadcast signals.

193. Overall, some interference to existing TV signals is possible as a result of this development. A Section 106 obligation will require the applicant to carry out a survey before the commencement of the development and following completion of the development to clearly identify any interference that has been caused. The Section 106 obligation will also require that the applicant underwrites all mitigation required in addressing any interference identified.

Fire Safety

194. Policy D12b of the London Plan (as well as the draft London Plan Fire Safety Guidance) requires all major development proposals to submit a Fire Statement which is an independent fire strategy, produced by a third party, suitably qualified assessor. The statement should detail how the development proposal will function in terms of:

- 1) *the building's construction: methods, products and materials used, including manufacturers' details*
- 2) *the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach*
- 3) *features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans*
- 4) *access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these*
- 5) *how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building*
- 6) *ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.*

195. The applicant has provided a Fire Statement which has addressed the above requirement, in accordance with policy D12B of the London Plan.

Employment and Training

196. Brent's Local Plan policy BE1 'Economic Growth and Employment Opportunities for All' states an Employment and Training Plan will be required for all major developments, to be prepared in partnership with Brent Works or any successor body.

197. A commitment to submit an 'Employment and Training Plan' to the Council for its approval prior to the material start of the development would be secured by way of a Section 106 obligation. This obligation is required of all major development schemes within the borough which comprise of 50 or more dwellings or at least 5,000sqm of floor space.

198. As set out in Brent's Planning Obligations SPD (2022), the obligations in this respect require that 1 construction job (for a minimum period of 26 weeks) for an unemployed Brent resident is secured per ten C3 homes delivered and per each 500sqm of commercial floorspace delivered, and that 50% of those jobs should be secured as apprenticeships for Brent residents, for a minimum period of 52 weeks. It also requires that a minimum of 20% of the operational phase jobs within commercial uses should be secured for Brent residents. The operational job requirements are set out in the Homes and Communities Agency Employment Density Guidance 3rd Edition (2015), requiring 1 operational job per 15-20sqm of commercial floorspace.

199. When applying these standards to the proposed development, it is projected that 13 construction jobs and 16 operational jobs to be secured for unemployed residents, with at least half of these jobs being in the form of apprenticeships for Brent resident's. In addition, reasonable endeavours must be used to secure a minimum of 20% of jobs, one operational, for Brent resident's. Projected construction and operational phase jobs shall be set out in an accompanying Employment and Training Plan, secured via s106 agreement.

200. The SPD also sets out a requirement for financial contributions to deliver support fees for each of the Brent resident's jobs to be secured. This contribution would be £80,750 for the construction and operational jobs. This would also be secured within the Section 106 Agreement.

201. If the job targets are not met, an additional payment of £5,000 per the number of jobs below the

target is to be secured to help secure other job opportunities for Brent residents. If the applicant fails to meet the job targets but can demonstrate that reasonable endeavours were undertaken to seek to meet the job targets, an increase in the base contributions would not be required. On the other hand, if the number of apprenticeship positions delivered for Brent residents exceeds the apprenticeship target, a reduction in the base contribution of £1,000 per additional apprenticeship would be applied.

Equalities

202. In line with the Public Sector Equality Duty, the Council must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010. In making this recommendation, regard has been given to the Public Sector Equality Duty and the relevant protected characteristics (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation).

Conclusion

203. Following the above discussion, officers consider that taking the development plan as a whole, the proposal is considered to accord with the development plan, and having regard to all material planning considerations, should be approved subject to conditions and s106 legal agreement to secure the obligations as set out.

204. The aparthotel proposed with an ancillary flexible F1/F2 space is considered to make efficient use of the land, which would regenerate the site which would provide a positive contribution to the emerging streetscene and the positive employment and economic benefits associated with the hotel. The building is considered to have an appropriate scale and massing of proposed buildings would relate well to the existing and future site context. As the report acknowledges, there is expected to be some impacts on existing daylight and sunlight light conditions to existing residential dwellinghouses nearby. The impacts would be commensurate with development of this form and such impacts must be balanced against the planning benefits of the proposal. Overall, and on balance, the impacts associated with the development would it is considered be outweighed in this case by the benefits of redeveloping the site, economic benefits and public realm improvements.



DRAFT NOTICE

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

DECISION NOTICE – APPROVAL

Application No: 23/3250

To: Molly Purcell
Iceni Projects
Da Vinci House
44 Saffron Hill
London
EC1N 8FH

I refer to your application dated **10/10/2023** proposing the following:

Demolition of existing hotel building and community centre and erection of a part 6, part 8 and part 10 storey 318 room aparthotel plus basement accommodation with associated ancillary facilities, community floorspace (Use Class F1/F2), servicing, landscaping and cycle and refuse storage (phased development)

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

at **1-11 Elm Road and 10-12 St Johns Road, Wembley, HA9**

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: 04/11/2024

Signature:

David Glover
Head of Planning and Development Services

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 2023
London Plan 2021
Brent's Local Plan 2019-2041

- 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 Location Plan
A 000 002 Rev P0 Red Line Site Boundary Plan
A 025 000 Rev P00 Existing Ground Floor Plan
A 025 001 Rev P00 Existing First Floor Plan
A 025 002 Rev P00 Existing Second Floor Plan
A 025 200 Rev P00 Existing Site Elevation
A 025 201 Rev P00 Existing Hotel Elevations
A 025 202 Rev P00 Existing Church Site Elevations
A 025 301 Rev P00 Existing Trees to be Replaced Ground Floor Plan
A 050 100 Rev P00 Proposed Ground Floor Demolition Plan
A 050 101 Rev P00 Proposed First Floor Demolition Plan
A 050 102 Rev P00 Proposed Second Floor Demolition Plan
A 100 099 Rev P3 Proposed Basement -01 Floor Plan
A 100 100 Rev P6 Proposed Ground Floor Plan
A 100 101 Rev P2 Proposed First Floor Plan
A 100 102 Rev P2 Proposed Second Floor Plan
A 100 103 Rev P00 Proposed Third to Sixth Floor Plan
A 100 107 Rev P1 Proposed Seventh Floor Plan
A 100 108 Rev P00 Proposed Eighth Floor Plan
A 100 109 Rev P1 Proposed Ninth Floor Plan
A 100 110 Rev P00 Proposed Tenth Floor Plan
A 100 111 Rev P1 Proposed Roof Plan
A 110 001 Rev P2 Proposed Elevation along Elm Road (South)
A 110 002 Rev P2 Proposed Elevation along St.Johns Road (West)
A 110 003 Rev P2 Proposed North Elevation
A 110 004 Rev P1 Proposed East Elevation
A 120 001 Rev P1 Proposed Section AA
A 120 002 Rev P1 Proposed Section BB
2022/6390/017 Rev P1 Proposed Cycle Store Arrangement
JKD23P01 Rev 04 Landscape Proposals

Supporting Documents

Arboricultural Impact Assessment & Tree Protection Plan Rev A (prepared by MDJ Arboricultural Consultancy Ltd, 6th May 2024)
Bat Report (prepared by Greengage, September 2023)
Biodiversity Net Gain Assessment (prepared by Greengage, August 2023)
Drainage Strategy Rev 05 (prepared by Pringuer-James Consulting Engineers Limited, March 2024)

External Building Fabric Assessment (prepared by RBA Acoustics, 2 August 2023)
Flood Risk Assessment (prepared by Pringuer-James Consulting Engineers Limited, May 2023)
Preliminary Ecological Appraisal (prepared by Greengage, August 2023)
Ventilation Strategy (prepared by Elkoms Consulting, July 2023)
Wind Microclimate CFD Study Rev 4 (prepared by Windtech, August 13 2024)

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

- 3 The scheme hereby approved shall contain 318 rooms within the new apart-hotel, as detailed in the drawings hereby approved, unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of proper planning.

- 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 flexible F1/F2 space as detailed within the approved plans 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 north-west elevation facing the gardens of St. John's Close and which serve Room 29 at First Floor Level and Room 38 at Second to Sixth Floor Level, as annotated on the drawings titled "Proposed First Floor Plan", "Proposed Second Floor Plan" and "Proposed Third to Sixth Floor Plan" shall be obscured glazed and high opening only (1.7m above internal floor level) and shall be maintained as such for the life of the development.

Reason: To ensure that the privacy and amenity of the neighbouring sites is not compromised.

- 6 The internal doors providing access to the areas labelled 'Biodiverse Roof' and 'Biodiverse Roof with PV Panels' as shown on the plans hereby approved shall provide access for maintenance purposes only, and shall not be used by customers of the aparthotel at any time, unless in the event of an emergency.

Reason: To ensure that the privacy and amenity of the neighbouring sites is not compromised.

- 7 The development shall be built so that no fewer than 10% of the aparthotel rooms hereby approved are accessible rooms in accordance with the criteria set out in London Plan 2021 policy E10 (H)(1). These aparthotel rooms shall be maintained as accessible for the lifetime of the development.

Reason: To ensure that the hotel development achieves an inclusive design

- 8 No guest or customer of the apart-hotel use hereby permitted may occupy any part of the apart-hotel accommodation for a period exceeding ninety days (90) in any continuous period of six months. The operator of the apart-hotel shall at all times maintain an accurate register of the 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 hotel accommodation meets an identified need and the quality of the hotel accommodation is sufficient in accordance with Brent Policy BE9.

- 9 All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or

subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at <https://nrmm.london/> "

Reason: To protect local amenity and air quality in accordance with Brent Policies BSUI1, BSUI2 and London Plan Policy S11.

- 10 The development shall be implemented in strict accordance with the Tree Protection Plan and Arboricultural Method Statement (by MDJ Arboricultural Consultancy Ltd. MDJAC-22.43-AIA-01A, 6th May 2024) throughout the construction of the development, unless alternative measures are submitted to and approved in writing by the Local Planning Authority, and the scheme is thereafter implemented in full accordance with the alternative measures.

REASON: To ensure that the trees to be retained will not be damaged during demolition or construction and to protect and enhance the appearance and character of the site and locality, in accordance with DMP1 and BGI 2.

- 11 The development hereby approved shall be carried out fully in accordance with the recommendations set out in the Preliminary Ecological Appraisal (Greengage, August 2023) throughout the construction of the development.

Reason: To prevent any harm to protected species and habitats.

- 12 The development hereby approved shall be carried out fully in accordance with the recommendations set out in the Drainage Strategy (PJCE, March 2024) unless alternative details are submitted to and approved in writing by the Local Planning Authority, and thereafter implemented in full accordance with the alternative details.

Reason: To ensure the control of surface water in accordance with Policy BSUI4 of the Local Plan.

- 13 The development hereby approved shall be carried out fully in accordance with the recommendations and mitigation measures in the External Building Fabric Assessment (RBA Acoustics, 2nd August 2023) unless alternative details are submitted to and approved in writing by the Local Planning Authority, and thereafter implemented in full accordance with the alternative details.

Reason: To prevent any harm to occupants of the development or nearby residents.

- 14 The development hereby approved shall be carried out fully in accordance with the recommendations and mitigation measures in the Ventilation Strategy (Elkoms Consulting, July 2023), unless alternative details are submitted to and approved in writing by the Local Planning Authority, and thereafter implemented in full accordance with the alternative details.

Reason: To prevent any harm to occupants of the development or nearby residents.

- 15 The cycle parking spaces shown on the approved plans shall be provided prior to first occupation or use of the development, and shall be retained as such thereafter and not used other than for purposes ancillary to the use(s) within the application site.

Reason: To ensure adequate cycle parking to meet the needs of the development in accordance with London Plan Policy T5, and to encourage use of sustainable transport modes.

- 16 Prior to commencement of the development hereby approved (including site clearance and

demolition works), a Construction Logistics Plan (CLP) shall be submitted to and approved in writing by the Local Planning Authority. The CLP shall include, but is not limited to the following:

- i. Construction programme, forecast construction trip generation (daily) and mitigation proposed;
- ii. Site set up and access arrangements and booking systems, ensuring vehicle loading and unloading takes place clear of the highway;
- iii. Construction phasing and details of times when the use of a crane would be required;
- iv. Vehicular routes to the site;
- v. Parking of vehicles of site operatives and visitors;
- vi. Storage of plant and materials used during the construction period;
- vii. Wheel washing facilities;
- viii. Any temporary lighting;
- ix. Protection of the carriageway and any footway users at all times during construction;
- x. Erection of hoardings, security fencing and scaffolding on/over and pavements and carriageway;
- xi. Contact details of personnel responsible for the construction works

Details of measures to be used to ensure that disruption to existing nearby residents is minimised as much as possible during the construction period (including demolition) shall also be provided.

The development shall thereafter be constructed fully in accordance with the approved Construction Logistics Plan, unless otherwise agreed in writing by the local planning authority.

Reason: To ensure the development is constructed in an acceptable manner and in the interests of pedestrian and highway safety.

Reason for pre-commencement condition: The condition relates to details of construction, which need to be known before commencement of that construction.

- 17 Prior to the commencement of the development, a Construction Method Statement (CMS) shall be submitted to and approved in writing by the Local Planning Authority outlining measures that will be taken to control dust, noise and other environmental impacts of the development during construction and site clearance works. The CMS shall include, but is not limited to, details of a dust monitoring plan, to be implemented during construction, site clearance and demolition works.

All agreed actions shall be carried out in full for the duration of the site clearance, demolition and construction phases, unless otherwise agreed in writing by the local planning authority.

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

Reason for pre-commencement condition: Construction nuisance can occur at any time during the construction process, and adequate controls need to be in place prior to works starting on site.

- 18 Prior to the commencement of the development a Construction Environment Management Plan shall be submitted to and approved by the Local Planning Authority outlining measures that will be taken to minimise the potential impact of the construction phase of the development on the existing ecology of the nearby off-site receptors, and to ensure works proceed in accordance with current wildlife legislation. This shall include, but not be limited to:

- (i) Measures for the avoidance of artificial lighting being directed onto the Sudbury Hill Harrow SINC, particularly along the northern boundary;
- (ii) The siting of any construction compounds and storage areas away from the northern boundary of the site; and,
- (iii) Controlling of surface water management.

The development shall be carried out in accordance with the approved document.

Reason: To ensure an acceptable impact on the surrounding environment during construction.

Pre-commencement Reason: The impacts being controlled through this condition may arise during the construction phases and therefore need to be understood and agreed prior to works commencing.

- 19 (a) Following the demolition of the buildings and prior to the commencement of building works on site, a site investigation shall be carried out by competent persons to determine the nature and extent of any soil contamination present. The investigation shall be carried out in accordance with the principles of BS 10175:2011. A report shall be submitted to the Local Planning Authority, that includes the results of any research and analysis undertaken as well as an assessment of the risks posed by any identified contamination. It shall include an appraisal of remediation options should any contamination be found that presents an unacceptable risk to any identified receptors. The written report is subject to the approval in writing of the Local Planning Authority.

(b) Any soil contamination remediation measures required by the Local Planning Authority shall be carried out in full. A verification report shall be provided to the Local Planning Authority, stating that remediation has been carried out in accordance with the approved remediation scheme and the site is suitable for end use (unless the Planning Authority has previously confirmed that no remediation measures are required).

Reason: To ensure the safe development and secure occupancy of the site.

- 20 Prior to the commencement of development (excluding demolition and site clearance), details of how the development is designed to allow future connection to a district heating network should one become available, shall be submitted to and approved in writing by the local planning authority and the development shall be completed in accordance with the approved details.

Reason: To ensure the development is in accordance with the principles of London Plan Policy SI3.

- 21 Prior to the commencement of development (excluding demolition, site clearance and laying of foundations), further details of external materials shall be submitted to and approved in writing by the local planning authority, and thereafter completed in accordance with the approved details.

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

- 22 Prior to the commencement of development (excluding demolition, site clearance and laying of foundations), detailed plans shall be submitted to and approved in writing by the Local Planning Authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development. The development shall be carried out in accordance with these plans and maintained as such in perpetuity.

Reason: To provide high quality digital connectivity infrastructure to contribute to London's global competitiveness now and in the future.

- 23 Prior to development commencing above ground on the development, a detailed landscaping scheme and implementation programme for all works within the red line boundary of the site shall be submitted to and approved in writing by the Local Planning Authority. The landscaping scheme shall incorporate the hard and soft landscaping details proposed on the approved plans, as well as further details of, but not limited to the following:

(i) Details of hard surfacing, including details of permeable paving, tree pit design, underground

modular systems, etc.

- (ii) Details of sustainable urban drainage systems as set out within the Drainage Strategy (PJCE, March 2024)
- (iii) Boundary treatment, means of enclosure and retaining structures;
- (iv) Other equipment and structures including precise locations of all Sheffield cycle stands to be provided within the public realm for a minimum of 9 short-term cycle spaces;
- (v) Species, locations and densities for 18 trees, grass and shrubs;
- (vi) Proposed walls, fencing, screening treatment and gates and any other permanent means of boundary treatment/enclosure, indicating materials, position and heights;
- (vii) Soil depth and composition on the roof of the building, and details of plants and shrubs for these areas;
- (viii) An appropriate green roof specification should rooftop PV provision be required for below panel greening;
- (ix) Details of biodiversity and ecology enhancement measures as set out within Preliminary Ecological Appraisal (Greengage, September 2023) and Biodiversity Net Gain Assessment (Greengage, August 2023)
- (x) Details of the location of a minimum of three bat boxes, bricks or 'habitats' suitable for summer roosting in accordance with the recommendations of the Bat Report hereby approved (Greengage, September 2023);
- (xi) Details of measures to secure a minimum Urban Greening Factor of 0.3;
- (xii) Details of any external CCTV installations;
- (xiii) A Landscape Management and Maintenance Plan setting out details of the proposed arrangements for maintenance of the landscaping, including management responsibilities.

The approved landscaping scheme shall thereafter be carried out in full accordance with the implementation programme prior to first occupation or use of the building.

It shall thereafter be maintained fully in accordance with the approved Landscape Management and Maintenance Plan, unless otherwise agreed in writing by the Local Planning Authority.

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 in similar positions by trees and shrubs of similar species and size to those originally planted, unless otherwise agreed in writing with the Local Planning Authority.

There shall be no excavation or raising or lowering of levels within the prescribed root protection area of retained trees unless agreed in writing by the Local Planning Authority. Unless required by a separate landscape management condition, all soft landscaping scheme shall incorporate written five year maintenance programme following planting.

Reason: In order to introduce high quality landscaping in and around the site in the interests of the ecological value and biodiversity of the site and to ensure a satisfactory landscaping of the site in the interests of urban greening and visual amenity having regard to Local Plan Policies DMP1, BGI1 and BGI2 and London Plan policies G5, G6 and G7.

- 24 Prior to the installation of any external lighting, details of such lighting shall be submitted to and approved in writing by the Local Planning Authority. This shall include, but is not limited to, details of the lighting fixtures, luminance levels within and adjoining the site, as well as ecological sensitivity measures. The strategy shall be in accordance with the recommendations of the Bat Report hereby approved (Greengage, September 2023).

The lighting shall not be installed other than in accordance with the approved details.

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

- 25 Prior to first occupation or first use of the development, a Community Access Plan relating to the use of the Flexible F1/F2 Space shall be submitted to and approved in writing by the Local Planning Authority. The Community Access Plan shall include details of rates of hire (based upon those charged at other public facilities), terms of access, hours of use, access arrangements and management responsibilities.

The approved Community Access Plan shall be brought into operation within 3 months of first occupation or use of the facilities and it shall remain in operation for the duration of the use of the Development.

Reason: To ensure the development is fit for purpose and provides facilities for local communities, and to protect the amenity of local residents.

- 26 Prior to the commencement of use of the apart-hotel, an updated Accessibility Management Plan (relating to the hotel use) shall be submitted to and approved in writing by the Local Planning Authority. This shall demonstrate the future operator's commitment to the provision of an inclusive and accessible facility which is reviewed on a quarterly basis in accordance with the principles laid out in Section 10 of the Design and Access Statement submitted with the application.

The Plan shall be fully implemented as approved thereafter, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the hotel development achieves an inclusive design.

- 27 Prior to first occupation or use of the development hereby approved, a full Delivery and Servicing Plan (DSP) outlining measures proposed to reduce the impact of servicing on the surrounding transport network, and how the site will look to support sustainable and active freight shall be submitted to and approved in writing by the local planning authority. All delivery and servicing activity shall thereafter be carried out fully in accordance with the approved details, unless otherwise approved in writing by the Local Planning Authority.

Reason: To ensure that all delivery and servicing activities can be safely accommodated on site without adversely affecting the safety and amenity of residents or other users of the development or conditions on the highway network, in accordance with Policy T7 of the London Plan.

- 28 Prior to first occupation or use of the apart-hotel hereby approved, a Coach Management Plan outlining operational management measures and initiatives to ensure the development is kept coach free shall be submitted to and approved in writing by the Local Planning Authority.

The management of coaches associated with the development shall thereafter be implemented in accordance with the approved details for its lifetime, unless an alternative plan is submitted to and approved in writing by the Local Planning Authority and thereafter implemented in full.

Reason: To ensure that the development does not adversely affect the safety and amenity of the users of the development or conditions on the highway network.

- 29 Prior to the occupation of the development the post-construction tab of the GLA's whole life carbon assessment template should be completed accurately and in its entirety in line with the GLA's Whole Life Carbon Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage, including the whole life carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. This should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the published guidance.

Confirmation of submission to the GLA shall be submitted to and approved in writing by the local planning authority prior to occupation of the relevant building.

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings.

- 30 Prior to the occupation of the development, a Post Completion Report setting out the predicted

and actual performance against all numerical targets in the relevant Circular Economy Statement shall be submitted to the GLA at: CircularEconomyLPG@london.gov.uk, along with any supporting evidence as per the GLA's Circular Economy Statement Guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation.

Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials.

- 31 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. An assessment of the expected noise levels shall be carried out in accordance with BS4142:2014 'Methods for rating and assessing industrial and commercial sound.' and any mitigation measures necessary to achieve the above required noise levels shall be submitted to and approved in writing by the Local Planning Authority. The plant shall thereafter be installed together with any necessary mitigation measures and maintained in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

Reason: To protect acceptable local noise levels, in accordance with Brent Policy DMP1.

- 32 Within six months from practical completion of the development hereby approved, a BREEAM Assessment and Post Construction Certificate, demonstrating compliance with the BREEAM Certification Process for non-domestic buildings and the achievement of a BREEAM Excellent rating, unless otherwise agreed in writing, shall be submitted to and approved in writing by the local planning authority.

Reason: To ensure the non-residential floorspace is constructed in accordance with sustainable design and construction principles, in accordance with Brent Local Plan Policy BSU11.

INFORMATIVES

1 - The provisions of The Party Wall etc. Act 1996 may be applicable and relates to work on an existing wall shared with another property; building on the boundary with a neighbouring property; or excavating near a neighbouring building. An explanatory booklet setting out your obligations can be obtained from the government website: <https://www.gov.uk/government/publications/preventing-and-resolving-disputes-in-relation-to-party-walls/the-party-wall-etc-act-1996-explanatory-booklet>

2 - The applicant must ensure, before work commences, that the treatment/finishing of flank walls can be implemented as this may involve the use of adjoining land and should also ensure that all development, including foundations and roof/guttering treatment is carried out entirely within the application property.

3 - 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.

4 - The applicant is advised that they will require approval in principle (AIP) for the retaining structures around the site perimeter from the Local Highway Authority (i.e. Brent's Highways & Infrastructure Service) prior to the commencement of works. A time period of 8-12 weeks should be allowed to obtain approval and further information can be provided upon request.

5 - The submission/approval of the Fire Safety Statement does not replace the need for building regulation approval in relation to fire safety, nor does it convey or imply any approval under those regulations.

6 - Brent Council supports the payment of the London Living Wage to all employees within the Borough. The developer, constructor and end occupiers of the building are strongly encouraged to pay the London Living Wage to all employees associated with the construction and end use of development.

7 - The applicant is informed that, in relation to the discharge of conditions regarding the remediation of contaminated land, the quality of imported soil must be verified by means of in-situ soil sampling and analysis.

We do not accept soil quality certificates from the soil supplier as proof of soil quality.

8 - Once the Post-Construction Monitoring report is approved by the LPA, the Applicant should provide the approved post-construction monitoring report and any supporting information to the GLA at circulareconomystatements@london.gov.uk

9 - The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read Thames Water guide 'working near our assets' to ensure works are in line with the necessary processes required to be followed if working above or near Thames Water pipes or other structures

[https://urldefense.proofpoint.com/v2/url?u=https-3A__developers.thameswater.co.uk_Developing-2Da-2Dlarge-2Dsite_Planning-2Dyour-2Ddevelopment_Working-2Dnear-2Dor-2Ddiverting-2Dour-2Dpipes&d=DwlFAw&c=OMjwGp47Ad5otWI0__lpOg&r=G_hzVySAkixNxE_J_EjNJR_FDWFjexJLES8DRQ06qKk&m=jtx127Pni3LvproHc4qhZJC3hVRmsiWhPbq-ouUTguo&s=-7m-Kfa-tNF2PxxaORnER5FY6ltFTutt9PPvqeYes&e=.](https://urldefense.proofpoint.com/v2/url?u=https-3A__developers.thameswater.co.uk_Developing-2Da-2Dlarge-2Dsite_Planning-2Dyour-2Ddevelopment_Working-2Dnear-2Dor-2Ddiverting-2Dour-2Dpipes&d=DwlFAw&c=OMjwGp47Ad5otWI0__lpOg&r=G_hzVySAkixNxE_J_EjNJR_FDWFjexJLES8DRQ06qKk&m=jtx127Pni3LvproHc4qhZJC3hVRmsiWhPbq-ouUTguo&s=-7m-Kfa-tNF2PxxaORnER5FY6ltFTutt9PPvqeYes&e=)

Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

10 - 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. Thames Water would expect the developer to demonstrate what measures will be undertaken 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 wwriskmanagement@thameswater.co.uk. Application forms should be completed on line via <http://www.thameswater.co.uk/wastewaterquality>

11. Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing a positive pumped device (or equivalent reflecting technological advances) to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions. Fitting only a non-return valve could result in flooding to the property should there be prolonged surcharge in the public sewer.

Any person wishing to inspect the above papers should contact James Mascall, Planning and Regeneration, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 2209