



Application for Planning Permission[Click here for case file](#)

Reference	PA/18/03094
Site	73-77 Commercial Road, London, E1 1RD
Ward	Whitechapel
Proposal	Demolition and redevelopment of site with a ground plus 13 storey building with a single storey basement, comprising a 156 bedroom hotel (Use Class C1), ancillary cafe and reception area, cycle parking provision, plant and storage, and other works incidental to the proposed development.
Summary Recommendation	Grant planning permission with conditions and planning obligations
Applicant	Regal CR Limited
Architect	Dexter Moren Associates
Case Officer	John Miller
Key dates	- Application registered as valid on 31/10/2018 - Public consultation finished on 03/12/2018

EXECUTIVE SUMMARY

The proposed redevelopment of this site represents a good example of hotel-led development (specifically an apart-hotel) and is considered appropriate in this location as it falls within the City Fringe Opportunity Area and City Fringe Activity Area. The ancillary cafe on the ground floor is complementary to the hotel space at the upper floor levels and surrounding area in the local context.

Heights, massing and design have slightly increased since the extant permission but would still appropriately respond to local context, safeguarding the character and appearance of nearby heritage assets. There would be some impact to the adjacent conservation area however; officers consider that the proposals would be of high architectural quality and that public benefits that would result from the scheme (including improved permeability across the site, a net increase in employment and affordable housing) would outweigh this limited harm.

The impacts on the amenity of neighbouring occupiers would be minimal and would be acceptable for an urban location.

Transport matters, including parking, access and servicing are acceptable and it is not considered that there would be any significant detrimental impact upon the surrounding highways network as a result of this development.

A strategy for minimising carbon dioxide emissions from the development has been proposed and a cash in lieu contribution has been agreed. Biodiversity enhancements are also proposed which are considered to provide a sustainable form of development.

The scheme would be liable to both the Mayor of London's and the Borough's community infrastructure levy. In addition, it would provide a necessary and reasonable planning obligation to local employment and training.

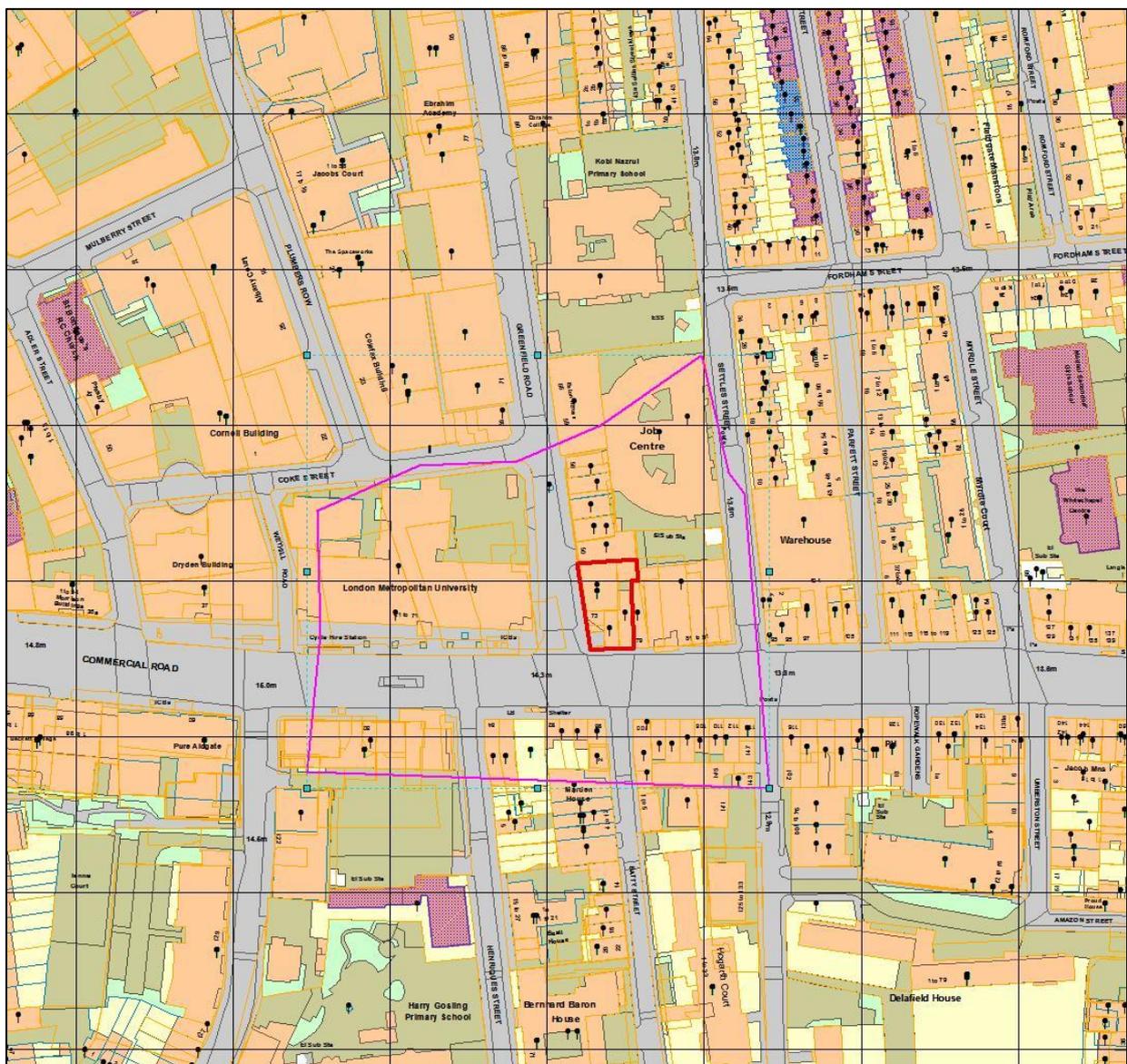


Figure 1: Site boundary (red) including consultation (pink)

1. SITE AND SURROUNDINGS

- 1.1 The site is a corner property located on the northern side of Commercial Road at its junction with Greenfield Road (to the west). It measures 0.04 hectares in size and is rectangular in shape with a step in at the south western corner. The site comprises three properties including Turner House which is located at the junction of Commercial Road and Greenfield Road. Turner House is part three /part four storeys in height and built in the 1960's. No. 75 and 77 Commercial Road are three storeys in height, built in the 1930's.
- 1.2 The existing uses across the application site include retail at ground floor level and basement level with ancillary storage space floorspace above. The local area is largely commercial in nature (office and retail including wholesale retail) with educational uses (such as the London Metropolitan University and the London Enterprise Academy either side of the site) and some residential / student accommodation also near to the site.
- 1.3 The surrounding area is of an inner-city mixed-use character with a variety of building heights and architectural styles.
- To the west of the site towards Aldgate the height generally increases with recent developments located on the block beyond the London Metropolitan University increasing to 19 stories in height.
 - To the east of the site beyond the London Enterprise Academy the heights are lower in range from 3-6 storeys.
 - To the north the heights along Greenfield Road closest to the junction with Commercial Road are generally 2 to 6 storeys in height; however, at the junction with Fieldgate Street the heights increase up to 7 to 8 storeys in height
- 1.4 The site does not fall within a conservation area; however, the site lies in close proximity to the Myrdle Street Conservation Area. The Myrdle Street Conservation Area has its western boundary around the properties to the eastern side of Settles Street and wraps around (and includes) the Job Centre to the north of the site.
- 1.5 The site lies within the outer 'core growth area' of the City Fringe Opportunity Area, is located in the City Fringe Activity Area and falls within close proximity to the CAZ. Commercial Road directly to the south of the site forms part of Transport for London's (TfL) red route.

2. PROPOSAL

- 2.1 The proposed development and the evolution of the design are described in detail within the applicant's Design and Access Statement. In brief, the applicant seeks to redevelop the site to provide a new 156 bed apart-hotel with an ancillary café at ground floor level.
- 2.2 The proposal would be ground plus 13 storeys in height (56.2m AOD & 41.98m from ground level) providing 6408sqm (GEA) of C1 hotel space. The rooms on the upper floor levels will be connected by way of a central core which results in the floor plates being near identical across floors 1-13.
- 2.3 At ground floor level, the development provides the reception and other back of house facilities, cycle and waste storage and the ancillary café which will provide active frontage to Commercial Road. The ancillary cafe will measure 132sqm (GIA). The proposal includes a chamfered corner at the junction of Greenfield Road and Commercial Road to encourage better footfall and provide more meaningful public realm directly outside the site.

2.4 The proposal will provide a single basement level containing an exercise room, staff dining area plant, and laundry facility. Access to the basement is provided by an internal lift and staircase.



Figure 2: Proposed site plan (white) and Myrdle Street Conservation Area (green)



Figure 3: Proposed entry along Commercial Road (from the south west)



Figure 4: Proposed site massing and surroundings (from the south west)

Table 2 – Existing and proposed uses

- 2.5 The scheme would be 'car free', except for the potential of 1 x on-site blue badge holder parking spaces. A total of 12 long-stay cycle parking spaces would be provided.
- 2.6 The architecture of the scheme would be contemporary in character, with rich detailing and a material palette centred on the use of robust materials such as brick, metal panels, and glazing as illustrated in the applicants' Design and Access Statement and re-produced below. Further selected plans and images of the proposed development are set out in Appendix 2.

3. RELEVANT PLANNING HISTORY

Application Site

- 3.1 PF/13/00182 – pre-application discussions consisting of the demolition of existing on site and replacement with new mixed use development, commercial uses retained at ground and basement levels, entrance and ancillary accommodation affordable residential units (12no) on first to third floors and private residential units (42 no) on fourth to twelfth floors. The pre-application as submitted proposed a building of 13 storeys in height.
- 3.2 PF/14/00167 – pre-application discussions regarding demolition of existing units and construction of mixed use development comprising Commercial uses at Ground and first floor and residential development above. No parking is proposed onsite. The pre-application as originally submitted proposed 16 storeys and was reduced to 11 storeys during the course of the pre-application process.
- 3.3 PF/15/00248 – pre-application discussions regarding a residential led scheme with ground floor commercial and retail uses. The most recent pre-application submission initially proposed a building of 15 storeys which was reduced to 11 storeys during the course of the pre-application process.
- 3.4 PA/17/00734 - Demolition and redevelopment of site to provide a single storey basement, together with ground plus ten storey building. Proposed mix of uses to include 420sqm (GEA) of flexible office and retail floorspace at ground floor level (falling within Use Classes B1/A1-A5) and the provision of 4,658 sqm (GEA) of office floorspace (Use Class B1), along with cycle parking provision, plant and storage, and other works incidental to the proposed development. Approved 27/11/2017
- 3.5 PF/18/00090 – pre application discussions regarding an aparthotel of 158 rooms with an ancillary café at ground floor level. The proposed building envelope will be no greater than the existing office permission but the different floor to ceiling requirements of hotel versus office allow for additional floors to be accommodated within the envelope.
- Former 73-75, Commercial Road, Stepney and 48-53 Greenfield Road
- 3.6 PA/60/01021 - The erection of three-storey building to be used in connection with 75 Commercial Road for the wholesaling of buttons and trimmings. Approved 10.06.1961
- Former 73-77 Commercial Road/54-58 Greenfield Road
- 3.7 ST/88/00034 - Redevelopment to construct office building. Approved 24.04.1989.
- 73 Commercial Road
- 3.8 PA/61/00659 - The erection of a building of ground, first, second and part third floor with basement to be used in connection with No 75 Commercial Road Stepney for wholesaling of buttons and trimmings. Approved 26.05.1961.
- 3.9 PA/64/00569 - The use of first and second floors for the processing of trimming cloth and yarns, the manufacture and processing of buttons and accessories for the clothing trade. Approved 28.09.1964.
- 3.10 ST/89/00052 - change of use of ground floor to car showroom and construction of new shopfront for a limited period of two years. Approved 29/03/1989.

- 3.11 ST/91/00038 - change of use to a vocational skills & English language training centre. Approved 29.05.1991.

75 Commercial Road

- 3.12 PA/79/00666 - Installation of an aluminium shopfront and use of the premises for showroom purposes (ground floor) with ancillary storage. Approved 21.08.1979.

79 Commercial Road

- 3.13 PA/18/00004 - Creation of a new mixed use 8 storey building comprising retail and office uses (A1 and A2) together with office under B1 use and associated ancillary uses. Approved 31.10.2018

13-19 Settles Street

- 3.14 PA/16/01945 - The change of use from Job Centre Plus (A2) to Office (B1a) use, along with the erection of a 4 storey rear extension. Approved 29.11.2016

- 3.15 PA/18/03230 - Variation of Condition no. 2 (Approved plans), 3 (External Facing Materials) and 7 (Obscured Glazing) of planning permission ref: PA/16/01945 dated 29/11/2016. Approved 23.01.2019

4. PUBLICITY AND ENGAGEMENT

- 4.1 The applicants carried out public consultation prior to submission of the previous application in 2017 holding a two day exhibition attended by 18 local residents. No objections were made to the 2017 application. The applicants circulated a community newsletter to 1512 properties for this submission and a dedicated phone line remains open. No public consultation has been received in this time (details set out in the applicant's Community Involvement Update).

- 4.2 Following the receipt of the application, the Council notified nearby owners/occupiers by post and by site notices. A press advert was also published in a local newspaper.

- 4.3 No representations were received.

5. CONSULTEES

LBTH Environmental Health - Contaminated Land

- 5.1 Environmental Health Contaminated Land has reviewed the submitted information and considers there is a possibility for contaminated land to exist. A condition is recommended to ensure any contaminated land is appropriately dealt with. The suggested condition would be secured should planning permission be granted.

LBTH Environmental Health - Air Quality

- 5.2 The Air quality officer stated that the building is in an area of poor air quality with NO2 levels above the national average. Appropriate planning conditions should be secured to achieve an air quality neutral development, air quality requirements during construction works and schemes of ventilation/extraction.

LBTH Environmental Health – Noise and Vibration

- 5.3 No comments received; however, this is discussed further in the 'noise' section of the report.

LBTH Refuse

- 5.4 The applicant has confirmed that the bin store is designed in accordance with British Standard BS5906:2005. It is anticipated there will be a daily waste collection and there are 5 Eurobins provided (of 1100 litre in size each) which meets the requirements. The applicant needs to provide information of the breakdown of how many and what type of bins will be collected each day. The applicant needs to provide information on how bulky waste will be managed and stored.
- 5.5 *Officer comment: the applicant has clarified that it is not anticipated that there will be bulky waste due to the nature of the C1 use. In addition, a servicing and management strategy will be secured by condition which will provide further information on the breakdown of the bins to landfill/recycling bins.*

LBTH Highways

- 5.6 The site is located in an area of excellent PTAL (PTAL of 6b), the highest level attainable which illustrates an excellent level of accessibility to public transport.
- 5.7 There is a previous permission on this site and the current change of use application utilises the transportation / highways principles accepted with the previous permission. As such there are no objections to the proposal in principle to this change of use. As per before no car parking is associated with the proposals and this is welcomed in such a location. The applicant has indicated that they would be willing to accept a restriction on the issuing of permits to occupiers which is supported.
- 5.8 The applicant is willing to fund an on street accessible bay. A commuted sum in the S106 agreement to cover costs of providing an on street bay is required. It is recognised that the site is constrained in terms of providing an on-site bay without compromising the ground floor active frontage.
- 5.9 With regards cycling the applicant is proposing numbers in excess of the London Plan and this is welcomed. All cycle facilities should be designed to meet the London Cycle Design Standards and should cater for adapted and recumbent cycles.
- 5.10 It is proposed to service the development on street as per the consented scheme which utilised existing arrangements from the public highway using the yellow lines on Greenfield Road given the site is constrained. There is an intensification of use compared to the current site situation and the number of servicing trips and length of time vehicles will be required to wait is likely to increase. There is an existing service bay on the TLRN and, in the first instance, this should be the location from where servicing takes place and we would expect suppliers to be made aware of this. A Service Management Plan which will be required by a planning condition.
- 5.11 The bin store is located at ground floor and will be trolleyed to the collection point on collection day. Holding areas will be required at ground floor level to ensure that the bins are not stored on the public highway.
- 5.12 Any basement works which are adjacent to or encroach under the public highway this will require full technical approval from the Council's highways structures team. Areas of the public highway are required to be stopped up under the development proposal.
- 5.13 Any previous conditions which accompanied the previous permission should be attached to any permission for this new application. A Travel Plan will also need to be secured.

LBTH Biodiversity officer

- 5.14 There will be no significant impacts on biodiversity and the buildings are not suitable for bats. There will be no significant adverse impacts on biodiversity.
- 5.15 The Ecology Report suggests that the biodiversity enhancements proposed in the consented application remain relevant which is agreed. These consisted of 2 bat boxes, 6 swift boxes, 2 sparrow terrace boxes and 2 bee/insect boxes and should be secured by way of condition.

LBTH Energy officer

- 5.16 The submitted Energy Statement (Flatt – October 2018 Version 5) identifies the design has followed the principles of the Mayor of London's energy hierarchy, and seeks to reduce energy demand through energy efficiency measures (15% reduction in emissions) and supply space heating, cooling and hot water efficiently through integration of an air source heat pump (ASHP).
- 5.17 The proposed design is anticipated to achieve a 27% in CO2 emissions. Whilst this is below the policy target of 45% the applicant is proposing to fulfil the shortfall through a carbon offsetting contribution of £124,650 and should be secured accordingly. Sustainability Policy DM 29 also requires sustainable design assessment tools to be used to ensure the development has maximised use of climate change mitigation measures
- 5.18 The proposal for the scheme is to achieve a BREEAM Excellent which is supported by the Sustainable Development Team and should be secured via Condition

SUDS

- 5.19 A detailed surface water drainage scheme will be required by condition prior to works commencing.

External responses

Crossrail Limited

- 5.20 Crossrail Limited does not wish to make any comments on this application.

City of London

- 5.21 City of London Corporation has no comments on the proposed development.

NATS

- 5.22 No safeguarding objection to the proposal

Natural England

- 5.23 No comments to make on this application

Historic England Archaeology (HEA)

- 5.24 EHA have advised that the site lies in an area of archaeological interest. Remains connected with Roman activity and the post-mediaeval development of London may be affected by the limited fresh intrusive works for extensions and the lift pit.
- 5.25 Appraisal of this application using the Greater London Historic Environment Record and information submitted with the application indicates the requirement for a compliance condition which will be secured.

London Fire and Emergency Planning Authority

5.26 No response to this application.

Crime Prevention Officer

5.27 Comments raised with regards to meeting with the project architects at this stage to discuss their intention around security and Secured by Design with confirmation that receipt has been made for an SbD Commercial 2015 application form. A Secure by Design accreditation condition is requested.

London Metropolitan University

5.28 No comments received

TFL London Underground

5.29 Response received confirming no comments to make on this application.

Thames Water Utilities Ltd.

Waste

5.30 Thames Water would advise that with regard to the combined water network infrastructure capacity, they would not have any objection to the above planning application, based on the information provided.

5.31 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

Water

5.32 Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water request planning conditions and informative.

Greater London Authority

Principle of development

5.33 The site lies within the City Fringe Opportunity Area and the City Fringe Opportunity Area Planning Framework (CFOAPF) (adopted in 2015) identifies the opportunity area as having capacity for 70000 new jobs and ,8700 new homes up to 2031. More specifically, London Plan Policy 4.5 supports the provision of leisure and business visitors in and around the CAZ and Opportunity Areas and recognised the need for apart-hotels. Draft London Policy E10 promotes serviced accommodation in parts of inner London outside the CAZ within Opportunity areas that are well-connected by public transport, particularly to Central London. The policies also require 10% of the hotel bedrooms to be wheelchair accessible.

5.34 The application site currently provides 1,538sqm of existing employment floorspace which has previously been uses for retail at ground floor and basement level across each building with low grade ancillary storage at upper levels. It should be noted that the existing lawful use of the buildings is retail (Use Class A1). It is proposed that the existing employment space be replaced with 5,728sqm of hotel floorspace including an ancillary café at ground level. The rooms provided would be self-catering rooms. The applicant also confirmed that 16 rooms (10%) would be fully wheelchair accessible.

- 5.35 The provision of 156 self-catering bedrooms in the accessible location of the City Fringe Opportunity area is therefore supported and complies with London Plan Policy 4.5 and draft London Plan Policy E10.

Urban design

General

- 5.36 The proposed building will be 13 storeys above ground which is broadly the same height of the extant permission.
- 5.37 In terms of height, this is consistent with nearby recent developments on Commercial Road which increase in height toward Aldgate. However, the development would be slightly taller than buildings immediately adjacent but would improve legibility by marking the junction of Commercial Road and Greenfield Road.
- 5.38 Whilst the buildings height is supported the top of the building to the northern elevation should be improved upon so it is better articulated while allowing for future development to come forward on the neighbouring site.
- 5.39 The applicant should look at increasing the pavement width and the need for an overhand is questioned.
- 5.40 Use of the brick is welcomed, however as stated above the visual appearance of the top of the building on the northern elevation should be improved to acknowledge the setting of the adjacent Myrdle Street Conservation Area.

Heritage

- 5.41 The proposed development falls within the setting of the Myrdle Street Conservation Area and would have a potential impact on the settings of several listed buildings and conservation areas in the wider area.
- 5.42 The applicant has provided a Heritage and Townscape Statement in order to demonstrate the potential impact of the proposals on the setting of local heritage assets and local views.
- 5.43 In views along Commercial Road from the west the proposals appear similar in height and massing to other buildings on Commercial Road and would fit comfortably with the existing townscape. In views from the north and south, the proposals are considered to landmark the junction and would not negatively impact on the setting of any heritage assets. In views from the east looking towards the Myrdle Street Conservation Area, the proposed building line would be visible as a prominent feature beyond the conservation area buildings lining the north side of Commercial Road. In this view 81-91 Commercial Road is clearly visible between the buildings of the conservation area and the proposal, the development would clearly appear as being outside of the conservation area and an integral part of the streetscene in the area beyond where the scale starts to transition towards the larger and taller buildings in Aldgate.
- 5.44 Having regard for the Heritage and Townscape Statement and considering the potential impacts in the context of the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF and London Plan policy 7.8, it is concluded that there would be no harmful impacts on the Myrdle Street Conservation Area or other heritage assets in the wider area.

Climate change

Energy

- 5.45 An on-site reduction of 102 Tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected for the non-domestic buildings,

equivalent to an overall saving of 26%. This falls short of the targets within policy 5.2 of the London Plan and the applicant should consider the scope for additional measures aimed at achieving further carbon reductions. Further information should be provided to confirm compliance with London Plan climate change mitigation policy. The amount of the proposed carbon offset payment to the Borough should be confirmed.

Flood risk, sustainable drainage and water efficiency

- 5.46 The approach to flood risk management for the proposed development generally complies with London Plan policies. However no consideration has been given to sewer or groundwater flooding on-site. This should be assessed.
- 5.47 Surface water drainage strategy for the proposed development does not comply with London Plan policies as it does not give regard to the drainage hierarchy and greenfield runoff rate. Additional information on the attenuation storage volume calculations, the attenuation tank dimensions, and SuDS maintenance should also be provided.
- 5.48 The proposal does not comply with London Plan policies for water consumption targets.
- 5.49 Technical information that should be provided for the scheme to become policy compliant has been sent separately to the applicant.

Transport

Transport for London

- 5.50 The site is located on the A13 Commercial Road which forms part of the Transport for London Road network (TLRN) with the nearest section of the Strategic Road Network (SRN) is 750m to the west on Aldgate High Street.
- 5.51 Cycle Superhighway 2 (CS2) runs along Whitechapel Road 400m to the north and CS3 runs along Cable Street 500m to the south. The area is also served by the Mayor of London's Cycle Hire Scheme with the nearest docking point on Commercial Road with 14 docking points.

Car parking

- 5.52 A car free development is proposed given the site constraints, though the applicant will convert an existing pay and display bay on Greenfield Road for Blue Badge use, which is supported.
- 5.53 Taxis and private hire vehicles serving the proposals would be able to pick-up and drop off on Commercial Road adjacent to the site within existing traffic regulations. This provision is acceptable.
- 5.54 Transport assessment sets out that the hotel operator will not accept coach bookings and that no coach parking provision was agreed during pre-application discussions with the Council. Based upon the location and scale of the hotel, this approach is acceptable to TfL.

Cycle parking

- 5.55 The applicant proposes 12 long stay spaces. This is accordance with London Plan polices and should be conditioned.
- 5.56 No additional short stay cycle parking is proposed and the applicant proposes to rely on stands on the surrounding highway to meet their requirements. The developer is required to enter into a highway agreement with TfL to provide 2 Sheffield stands on Commercial Road and/or Greenfield Road.

Impact Assessment

5.57 TfL is content that the development can be accommodated on the transport network.

Stopping up public highway

5.58 TfL has agreed to the stopping up of a section of the highway fronting the development. Along Commercial Road.

Community Infrastructure Levy

5.59 In accordance with London Plan policy 8.3, Community Infrastructure Levy (CIL), the Mayor of London commenced CIL charging for developments on 1st April 2012. It is noted that the proposed development is within the Borough, where the Mayoral charge is £35 per square metre Gross Internal Area (GIA).

5.60 The site is also in the area where section 106 contributions for Crossrail will be sought in accordance with London Plan Policy 6.5 and the associated Supplementary Planning Guidance (SPG). In these situations, the Mayoral CIL will be treated as a credit towards the section 106 Crossrail liability and this should be reflected in the wording of the section 106 agreement.

5.61 In June 2017, the Mayor of London published proposals for an MCIL2 to contribute to Crossrail 2 funding which would be levied from April 2019. The applicant will need to ensure they are fully aware of the regulations.

6. RELEVANT PLANNING POLICIES AND DOCUMENTS

6.1 Legislation requires that decisions on planning applications must be taken in accordance with the Development Plan unless there are material considerations that indicate otherwise. Further guidance is provided within Agenda item 5.

6.2 In this case the Development Plan comprises:

- The London Plan 2016 (LP)
- Tower Hamlets Core Strategy 2010 (SP)
- Tower Hamlets Managing Development Document 2013 (DM)

6.3 The key development plan policies relevant to the proposal are:

Land Use - LP4.1, LP4.5, LP4.7, SP01, SP02; SP06, DM1, DM7
(city fringe areas, hotels, retail)

Design - LP7.1-7.8, SP09, SP10, SP12, DM10, DM23, DM24, DM26, DM27
(layout, massing, building heights, materials, public realm, heritage)

Amenity - LP7.6, LP7.15, SP03, SP10, DM25
(privacy, outlook, daylight and sunlight, construction impacts)

Transport - LP6.1, LP6.3, LP6.9, LP6.10, LP6.13, SP05, SP09, DM14, DM20, DM21, DM22
(sustainable transport, highway safety, car and cycle parking, waste, servicing)

Environment - LP3.2, LP5.1 - 5.15, LP5.21, LP7.14, LP7.19, SP03, SP04, SP11, DM9, DM11, DM13, DM29, DM30

(biodiversity, energy efficiency, air quality, drainage, contaminated land)

6.4 Other policy and guidance documents relevant to the proposal are:

- National Planning Policy Framework (2019)
- National Planning Practice Guidance (updated 2019)
- LP Land for Industry and Transport SPG (2012)
- LP Draft New London Plan (2018)
- LBTH Employment Land Review (2016)
- LBTH Planning Obligations SPD (2016)
- LBTH Draft Local Plan (2019)

7. PLANNING ASSESSMENT

7.1 The key issues raised by the proposed development are:

- i. Land Use
- ii. Design & Heritage
- iii. Neighbour Amenity
- iv. Transport & Waste
- v. Environment
- vi. Infrastructure
- vii. Local Finance Considerations
- viii. Equalities and Human Rights

Land Use

Extant permission

7.2 In terms of the extant permission (with planning reference PA/17/00734), the applicant fully intended to deliver an office led development, however following the granting of planning permission the proposed occupier/provider pulled out citing a number of reasons, namely the size of office floorplates and lack of flexibility as a result of the plot layout.

7.3 The applicant has also undertaken further studies of the existing floorspace and it has been determined that the Lawful use of the site is A1 with ancillary space above. The previous permission cited a small portion of office space (B1a) however this has since been identified and corrected within the current submission.

Proposed Hotel Use

7.4 The Council's relevant planning policy with regards to new hotel development is contained within adopted Policy DM7 of the Development Management Document (2013) and emerging draft Policy D.TC6 of the Tower Hamlets Local Plan 2031 'Managing growth and Sharing the benefits' ('Tower Hamlets emerging Local Plan' (2018 version)). Adopted Policy DM7 states

that, in principle, new visitor accommodation will be supported within the Central Activities Zone, Canary Wharf (Major Centre), Tower Hamlets Activity Areas and District Centres, or along primary routes where adjacent to transport, where the following criteria is met:

- a) The size is proportionate to its location within the town centre hierarchy;
- b) There is a need for such accommodation to serve visitors and the Borough's economy;
- c) It does not compromise the supply of land for new homes and the Council's ability to meet its housing targets;
- d) It does not create an over-concentration of such accommodation or cause harm to residential amenity; and
- e) There is adequate road access and servicing for coaches and other vehicles undertaking setting down and picking up movements.

Part a) proportionate to town centre hierarchy

7.5 In terms of complying with the above policies the building envelope has remained largely similar in terms of height, mass, bulk and design to the extant office permission. The proposed development continues to optimise the development potential of a highly accessible site within an identified Opportunity Area, whilst still responding to immediate building relationships and respecting the immediate surrounding area. Particular regard has been given to the importance of responding to the adjacent buildings, but also the changing nature of the area and taller buildings to the west of the site. Officers find this suitable in meeting the requirements of part a) in this instance.

7.6 In terms of the suitability of the site to accommodate a hotel development and contribute towards addressing need, the site is within the City Fringe Opportunity Area, Tower Hamlets City Fringe Activity Area, Whitechapel Vision Masterplan area, and also has excellent transport accessibility (PTAL 6b). Adopted and emerging planning policy supports the provision of a new hotel in this location, and therefore makes the site suitable to contribute towards meeting an identified strategic and local need.

Part b) need for such accommodation

7.7 To fully comply with part b) the applicant has instructed hotel specialists 'Michels&Taylor' to undertake extensive research into the existing and pipeline hotel supply to establish whether there is a need for the type of hotel proposed for the site. A Hotel Needs Assessment forms part of the submission package which identifies that despite a pipeline of incoming supply, the continued supply of new visitor accommodation in appropriate locations will be fundamental to meeting the future needs as demand continues to grow. When considering the GLA's visitor accommodation strategy to 2041 and the demand outlook for London as a whole, it is evident that there is a clear need for further visitor accommodation within the Borough in appropriate locations, of which the site falls within.

7.8 It is also considered that the proposed development will provide the opportunity to make a positive impact on the local economy, bringing new leisure and business visitors to the local area, increasing the Borough's income through visitor spend and the creation of jobs in and around the hotel to cater for this increase in visitor footfall.

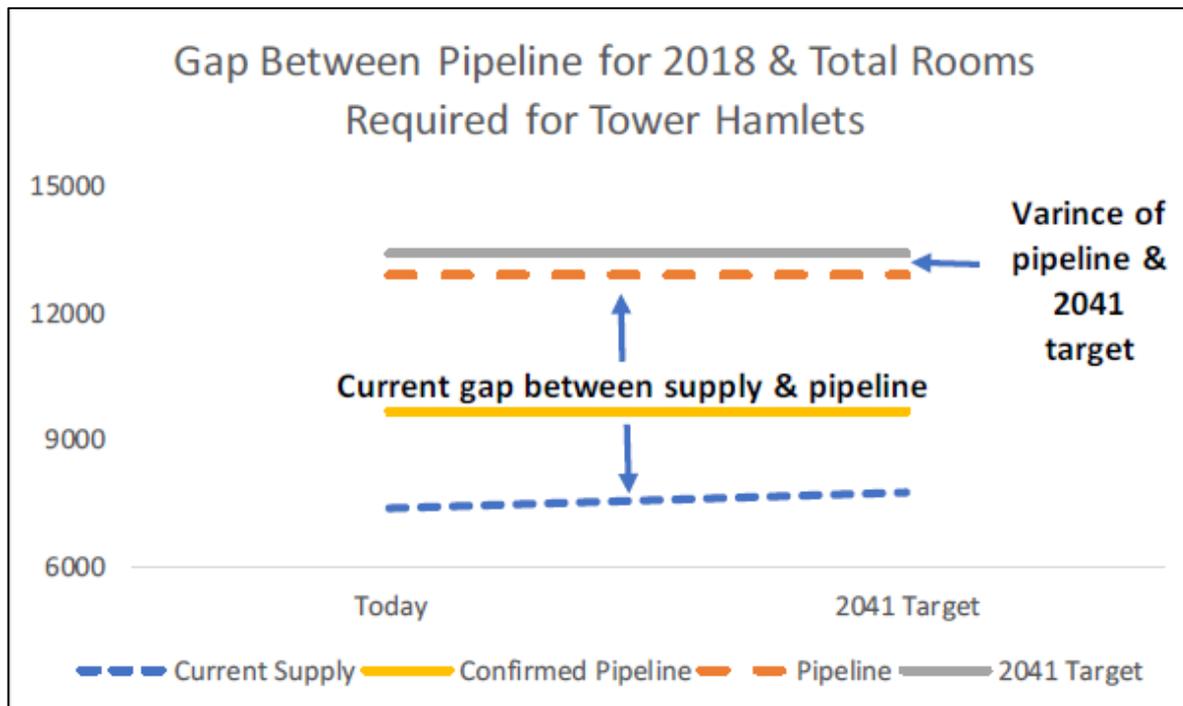


Figure 5: Hotel supply Tower Hamlets

Part c) – does not compromise the supply of housing

- 7.9 As part of previous pre-application discussions between the applicant and the Council in connection with application PA/17/00734/A1 and more recent pre-application discussions associated to this planning application (Ref: PF/18/00090), it was confirmed that the site is not considered to suitable for residential development due to the constraints of the site and the inability to meet the relevant residential design standards including amenity space provision and adequate daylight and sunlight provision without relying on adjoining sites. Officers therefore consider that the proposal would comply with part c).
- 7.10 With regards to the emerging policy D.TC6 of the Tower Hamlets emerging Local Plan' (2018 version) and the potential loss of employment space, as identified above the Applicant intended to deliver an office led scheme however this fell through when the provider (WeWork) pulled out in March 2017. Citing the fact that they didn't think the floorplates would work for their business and that there were better buildings available within other City Fringe locations.
- 7.11 Following this, extensive discussions took place with a number of other parties including CoWork, Headspace, Workpad, Huckletree, Vienna Hotel Group (as overflow head office space) and The Office Group (TOG). TOG agreed Head of Terms (HoTs) in May 2017 and confirmed that they would enter into a lease once planning permission had been secured. Planning permission was granted in November 2017 but unfortunately TOG decided in December 2017 that they were unable to proceed with the opportunity. Like WeWork, they cited the constrained nature of the floorspace and the fact that there were better opportunities at other locations that met their requirements.
- 7.12 Furthermore throughout this extensive marketing process, the Applicant was approached by a number of hotel operators but did not pursue the leads due to their commitment to deliver an office development on the site. Alongside the office market feedback, this has ultimately

demonstrated that a hotel was a far more appropriate use on the site. Officers would raise no objections to these findings.

- 7.13 As has been stated previously, adopted and emerging planning policy supports the provision of a new hotel in this location and encourages the provision of new hotels in this area.
- 7.14 The hotel will be operated by StayCity, specifically through their higher end 'Wilde' brand. StayCity operate over 1000 rooms in various city centre locations across Europe. The 'Wilde' brand in particular provides a mid to upscale hotel offer which is characterised by high quality self-catering rooms, providing accommodation for business and leisure travellers. As set out within the Hotel Needs Assessment, the proposed 'Wilde' hotel has the opportunity to address a particular need in the area, which currently contains hotels at the low and higher ends of the markets, with little in between.

Part d) overconcentration and potential harm to amenity

- 7.15 It is noted that emerging draft Policy D.TC6 of the emerging Tower Hamlets Local Plan (2018 version) removes part (d) of Policy DM7. Notwithstanding this, consideration has been given to this part of Policy DM7.
- 7.16 In terms of impact upon neighbouring amenity the area is largely mixed use in nature with the limited residential properties in the vicinity, the closest of which being the properties on the southern side of Commercial Road. Access to the hotel is via the main Commercial Road elevation and the fenestration has been designed in such ways as to not overlook residential windows to the north. No balconies are proposed to the hotel and the hotel will be contained within a single block.
- 7.17 Additionally the proposed hotel will be conditioned in order to operate in accordance with the submitted servicing and management plans.

Part e) transport considerations

- 7.18 The Applicant has submitted a number of transportation documents which identify the existing and proposed arrangements. In summary, the development site is located in a highly sustainable location with good footway and cycle links, and a wide range of public transport facilities available. The site has a PTAL score of 6b, which is defined as excellent by TfL. Furthermore, there are a number of services / amenities located within accessible distance of the site
- 7.19 Due to the sites highly sustainable location, the proposed development will be car free with no off-street vehicular parking to be provided. Cycle parking will be provided in accordance with the standard. Whilst there is a good level of existing provision of visitor cycle spaces within the vicinity of the site, the applicant has committed to providing additional cycle parking in the public realm
- 7.20 In addition, to improve the inclusivity of the site for all, the applicant has committed to providing a sum of £5000 toward wheelchair accessible bays in the vicinity of the site.
- 7.21 A trip generation assessment has demonstrated that the proposals will lead to the majority of movements to the site being undertaken by active modes of travel, namely by public transport or walking. The number of taxi trips associated with the site has been shown to be a maximum of 17 per day under the assumption of a fully occupied hotel. The trips will be spread across the day rather than concentrated within peak hours.
- 7.22 Lastly, whilst part (e) states that adequate road access and servicing for coaches should be secured, due to the constraints of the site the applicant has agreed to a commitment by way of legal agreement to restrict coach bookings to the site.

7.23 In this context and subject to future conditions to secure the appropriate management of the hotel in line with the submitted documentation, the proposed development meets part (e) of Policy DM7.

DM7.2 - Serviced apartments – Lets of up to 90 days

7.24 The proposed hotel would traditionally not be considered to fall under the classification of serviced apartments and therefore part 2 of the policy would not be relevant. However, as the rooms are serviced with small kitchenettes officers would recommend that an obligation is included in the legal agreement for lets of up to 90 days to ensure the rooms are managed appropriately as short-term accommodation.

7.25 London Plan 4.5 policy London Plan seeks to achieve 40,000 net additional hotel bedrooms by 2036, of which at least 10 per cent should be wheelchair accessible. The London Plan demonstrates there is a need for such accommodation and as outlined in the previous section the proposal will meet this need. In response to the London Plan Policies;

- The applicant has committed to providing 10% wheelchair accessible accommodation (16 rooms) which will be secured
- The London Plan seeks accommodation in appropriate locations and should focus in town centres and opportunity and intensification areas of which the site falls within
- As outlined above, the site is located in a highly accessible (PTAL 6b) and is located in the City Fringe Opportunity Area and City Fringe Activity Area where such uses should be accommodated.
- The applicant has highlighted within their submission that there is limited provision of hotels and more specifically apart-hotels within the locality with the nearest similar facility being provided at Excel Apartments in Algate, some 500m away. These are more traditional 2-bed serviced apartments and provide a different offer than the proposal. For this reason and those provided above the proposal will not harm the balance of uses in the locality. In addition, as outlined above, the proposal will not cause harm to neighbouring amenity given the limited residential properties in proximity to the site.
- The proposal provides an apart-hotel which is recognised within the London Plan as meeting a particular need with regards to visitor accommodation.

7.26 *Loss of Existing Uses*

7.27 Management Policies state that within Tower Hamlets Activity Areas, a mix of uses will be supported. Development in these areas should provide a transition between the scale, activity and character of the CAZ and Canary Wharf Major Centre and their surrounding places. Development proposals should be mixed use schemes with active uses at ground floor level. It should be noted that the site is located in the City Fringe Activity Area but is within close proximity to the CAZ boundary (please state where CAZ boundary is).

7.28 Given that the CAZ supports a mix of uses and that the surrounding site area is largely retail in nature the proposed hotel use with ancillary cafe is acceptable in this regard. To further support the notion of a vibrant mixed use site in the City Fringe the applicant commissioned a survey of the surrounding uses which can be seen on the table below.

Use Class of unit	Number of occupied units	Number of vacant units	Total
A1	127	25	152
A2	25	9	34
A3	19	8	27
A4	3	0	3
A5	5	0	5
Total	179	42	221

Figure 6: Local retail study

- 7.29 The evidence submitted suggests a high concentration of retail units in the direct vicinity which are in A1 use, and the loss of the units in this location given their limited street presence and access are not considered to have a detrimental impact on the retail opportunities in the area, nor is it considered to undermine the strategic or local retail provision from within the CAZ.

Provision of ancillary café at ground floor & employment opportunities

- 7.30 As per the above, management policies support a range of uses within the CAZ as well as asking developments to comply with the Town Centre Hierarchy and ensure the scale and type of uses within town centres are consistent with the hierarchy, scale and role of each town centre. Development in these areas should provide a transition between the scale, activity and character of the CAZ and their surrounding places. Development proposals should be mixed use schemes with active uses at ground floor level with residential or office space on upper floors. Key anchor uses, such as supermarkets and civic uses, will only be allowed within the town centre boundaries of the Activity Areas.
- 7.31 At ground floor level an ancillary cafe unit is proposed measuring 132sqm. The unit is proposed to complement the hotel use and to provide an active use at ground floor level, and whilst not meeting the letter of the policy in terms of providing a traditional retail unit the proposed ancillary café by nature of the hotel use (which could accommodate up to 481 guests when at capacity) would provide an active use at ground floor level which officers find suitable. Additional information was submitted further detailing how the café would operate together with a letter of intent from StayCity regarding how the use would be crucial to the success of the Hotel. Officers have reviewed the submitted information and find that the proposed café would activate the streetscene more in line with a traditional retail unit.
- 7.32 As set out within the previous application for extant permission PA/17/00734/A1, 5 full time employees had been recorded at the site with all of the businesses having since relocated to alternative premises.
- 7.33 The proposed hotel use would create approximately 20 full time job opportunities, together with a wide range of secondary employment opportunities through the services the hotel will require e.g. a local laundry service or a local food and drink supplier. Together with the impact from bringing a wide range of leisure and business visitors associated with a 156 bedroom hotel to the area, which will lead to an increase in the Borough's income through visitor spend and the creation of jobs in and around the hotel to cater for this increase in visitor footfall, the

proposed development has the opportunity to have a significant positive impact on the local economy when compared to the existing use.

Design & Heritage

- 7.34 Development Plan policies call for high-quality designed schemes that reflect local context and character and provide attractive, safe and accessible places that safeguard and where possible enhance the setting of heritage assets.

The Proposal

- 7.35 The proposal seeks the erection of a single building consisting of ground plus 13 storeys in height (56.2m AOD & 41.98m from ground level). At ground floor an ancillary café is proposed with 156 C4 hotel rooms.
- 7.36 The site is heavily constrained by the existing urban grain and lacks permeability / meaningful public realm in its existing form.
- 7.37 The ground floor entrance and ancillary cafe proposes large levels of glazing which will provide activation to the street frontage along both Commercial Road and Greenfield Road. The proposal will provide a chamfered corner which will in turn encourage better footfall and improve the public realm outside the site.

Townscape Massing and Building Heights

- 7.38 Policy DM26 makes clear that the height and scale of buildings should be proportionate to their location within the town centre hierarchy (with this site located 'Outside of Town Centres'). Policy DM26 also requires development to achieve a high architectural quality which contributes positively to the skyline, not adversely affecting heritage assets or strategic views, presenting a human scale at street level including not creating unsuitable microclimate conditions.
- 7.39 The proposed building is ground plus 13 storeys in height (56.2m AOD & 41.98m from ground level) and will provide active frontages with high levels of glazing at ground floor level.
- 7.40 The tallest buildings are located in the CAZ and the principle of tall buildings are supported in this area by the CFOAPF and the Aldgate masterplan with the heights decreasing away from the 'central cluster' of buildings at Whitechapel High Street/Braham Street. Given the application site's location in the City Fringe Activity Area but on the cusp of the CAZ, the proposal will need to respect the emerging context and transition from the CAZ in addition to the heritage context and lower scale further to the north/east.
- 7.41 The building heights in the local vicinity vary with the block the site is located on ranging from 3 to 7 storeys. To the east of the site beyond the London Enterprise Academy the heights are lower in range from 3-6 storeys. To the north the heights along Greenfield Road closest to the junction with Commercial Road are generally 2 to 6 storeys in height; however, at the junction with Fieldgate Street the heights increase up to 7 to 8 storeys in height.
- 7.42 In the current situation, the building heights in the local vicinity vary with the block the site is located on ranging from 3 to 7 storeys. To the west of the site toward Aldgate the height generally increases up towards 17 storeys. To the east of the site beyond the London Enterprise Academy the heights are lower in range from 3 to 6 storeys. To the north the heights along Greenfield Road are generally 2 to 8 storeys in height.

- 7.43 The proposed development has slightly increased the height when compared to the extant permission which came in at 11 storeys (55.5m AOD & 41.27m from ground level), although floor to ceiling height were higher in the extant permission.
- 7.44 The following consented/built out schemes in proximity to the site should be considered when assessing the height of this proposal at 13 storeys (56.2m AOD & 41.98m from ground level).

The extant permission:

- 73-77 Commercial Road – Office led scheme at 11 storeys in height (circa 55m AOD). Consented 2017

To the west of the height on the northern side of Commercial Road:

- 27 Commercial Road/29-37 White Church Lane – hotel led scheme at 21 storeys in height (81.42m AOD). (consented in 2014 works commenced on site)
- 33-35 Commercial Road – student led housing scheme 17 storeys in height (completed).

On the southern side of Commercial Road to the west of the site:

- 54-58 Commercial Road – residential led development of 18 storeys in height (completed)
- 60 Commercial Road – student accommodation tower at 19 storey in height (completed)
- 88-90 Commercial Road – residential led scheme at 5 storeys in height (consented November 2012)

To the east of the site on the northern side of Commercial Road:

- 81-91 Commercial Road – rooftop extension to the London Enterprise Academy to create a 7 storey building (completed)
- 79 commercial road – office led development incorporating the demolition of existing building and construction of a new 8 storey building.

To the north of the site on Greenfield Road:

- Site at south west junction of Coke Street and Greenfield Road – London College of Furniture at 6 storeys in height. Consented in 2004; however, permission has now expired
- 13-29 Settles Street – Construction of 4 storey extension totalling 5 storeys (consented November 2016 & January 2019).

- 7.45 As can be seen from the above height markers, the site is in an area of transition. The emerging height context generally decreases from Aldgate, through the CAZ along Commercial Road to the City Fringe. To the east of the site (beyond the 7 storey London Enterprise Academy), the heights begin to gradually decrease with no recent consents for taller buildings given this area's heritage designation. With regard to Greenfield Road, both Commercial Road and Fieldgate Street provide bookends to the height context with the lower heights in the middle section of Greenfield Road and the tallest heights at either end of Greenfield Road.
- 7.46 When taking into account the transition of heights within this part of the City Fringe and CAZ to the west, the proposed development is considered to sit comfortably providing transition between the emerging context to the west of the site along Commercial Road and provide suitable transition to the lower scale to the north and lowest scale to the east.

Appearance & Materials

- 7.47 Further amended graphics have been received which depict a revised ground floor frontage and articulation of the facades. A single storey undercroft is now proposed and the fenestration pattern has been split into 4 distinctive horizontal and vertical bands to break up the massing.
- 7.48 More specifically, the fenestration to the upper storeys of Greenfield Road and Commercial Road has been retained from the contented scheme, with metal spandrel panels providing greater depth and articulation to each of the two principal elevations. The fenestration pattern has however been revised to accommodate the additional storeys and change in use and improvements to the bathroom windows and reduction to the roof plant enclosure following are also welcomed.
- 7.49 Further improvements have been made to the scheme as a result of pre application and ongoing discussion as officers note the adjustment the façade to brick to glazing ratio across the site as well as on the window bay to the corner of Commercial Road and Greenfield Road in order to line up the brick piers with the corner column. This has assisted in opening up the active frontage to the streets adjoining the site.
- 7.50 The north and east elevations have been left blind given the potential for future development of the adjacent sites. The upper half of the building on these elevations has been articulated using an inset brick grid that reflects the fenestration pattern to the principal south and west elevations. Due to comments from the GLA, revisions have been received regarding this architectural detailing providing multiple options, adding further visual interest and depth to the façade. This detail will be secured via condition.
- 7.51 The proposed materials palette of brick, glass and aluminium window frames is considered appropriate. The bulk of the development utilises a grey brick complemented by contrasting aluminium frames to windows. Overall, this will present a robust and solid appearance, consistent with other buildings in the vicinity including those located within the Myrdle Street Conservation Area. Material samples will be required by condition.
- 7.52 In so far as one can divorce the architecture of the building from its context and how it relates at street level, it is considered the amended elevational treatment of the proposed building is of a high standard with a façade that is predominantly vertical with some horizontal banding to break up the height and massing of the building.

Secure by Design

- 7.53 Policy 7.3 of the London Plan and policy DM23 of the Managing Development Document (2013) seek to ensure that developments are safe and secure.
- 7.54 The proposed development has been assessed by the Crime Prevention Officer who has not raised objection to the proposal, however wanted further clarification on the development. A Condition would therefore be attached to any approval, to ensure that the development will seek to achieve the Secure by Design Accreditation.
- 7.55 Subject to conditions, it is considered that the proposed development as a consequence would provide a safe and secure environment in accordance with policy 7.3 of the London Plan and policy DM23 of the Managing Development Document (2013).

Inclusive Design

- 7.56 Policy 7.2 of the London Plan (MALP 2016), Policy SP10 of the Core Strategy (2010) and Policy DM23 of the Managing Development Document (2013). seek to ensure that developments are accessible, usable and permeable for all users and that a development can

be used easily by as many people as possible without undue effort, separation or special treatment

- 7.57 A growing awareness of the importance of creating environments that are accessible for all people has led the Council to emphasise the importance of 'inclusive design'.
- 7.58 The Applicant has considered how the development can be inclusive and accessible to all in terms of its design. All users of the building will use the same level access from Commercial Road which has sliding doors directly from the street. All levels of the building are serviced via lift access (two lifts in total) with wheelchair accessible rooms across levels 2-13 of the building.
- 7.59 The Applicant has also committed to providing 16 rooms (10%) to be fully wheelchair accessible.
- 7.60 External to the building, a chamfered corner is proposed. The movement around this corner is 1.5 metres, the same as the extant permission which allows a more inclusive design.
- 7.61 As per the previous application the Applicant has also offered a commuted sum toward a wheelchair accessible parking bay in proximity to the site. This will be secured through the s106 legal agreement.
- 7.62 It is considered that the proposal would result in a scheme that would be well connected to its surroundings and would provide a development that can be used safely and easily and with dignity for all regardless of disability, age, gender, ethnicity or economic circumstances. The proposal is considered to comply with policy 7.2 of the London Plan (2016), Policy SP10 of the Core Strategy (2010) and Policy DM23 of the Managing Development Document (2013).

Design Conclusions

- 7.63 In conclusion, the urban design, layout, building height, scale and bulk and detailed design of the development is considered acceptable and in accordance with Chapter 7 of the London Plan (2016); Policies SP10 and SP12 of the Core Strategy (2010) and Policy DM23, DM24 and DM26 of the Managing Development Document (2013) which seek to ensure buildings and places are of a high quality of design, suitably located and sensitive to the locality.

Heritage

- 7.64 Development Plan policies call for development affecting heritage assets and their settings to conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

Strategic Views

- 7.65 The development does not affect any strategic views.

Archaeology

- 7.66 Whilst the site does not fall in a designated Archaeological Priority Area, Historic England Archaeology (GLAAS) advises that the site lies in an area of general archaeological interest. Remains connected with Roman activity and the post-mediaeval development of London may be affected by the limited fresh intrusive works for extensions and the lift pit.
- 7.67 Following amendments to the Written Scheme of Investigation (WSI) GLAAS are satisfied that the proposal could be dealt with by an appropriately worded compliance condition.

Surrounding Conservation Areas and Listed Buildings

- 7.68 Officers consider the application site to possess no specific heritage or townscape value. The site comprises three properties including Turner House which is located at the junction of Commercial Road and Greenfield Road. Turner House is part three /part four storeys in height and built in the 1960's. No. 75 and 77 Commercial Road are three storeys in height, built in the 1930's in the art-deco era and in a simple style. The existing properties at no. 75 and 77 Commercial Road have been altered fairly substantially with altered ground floor and replacement windows at no.75.
- 7.69 The application site is located in close proximity to the Myrdle Street Conservation Area (MSCA) which is a designated heritage asset. There are no listed buildings or locally listed buildings in close proximity to the site whose setting would be affected by this proposal.
- 7.70 The MSCA Character Appraisal highlights that the conservation area is characterized by high density development and a variety of types and sizes of property which vary in scale and quality. The character appraisal notes that the properties on New Road are among the largest in scale, together with those on Settles Street which are of 4 and 5 storeys with basement. Those on secondary residential roads running parallel to New Road and Settles Street are smaller in scale.
- 7.71 The applicant has submitted a Heritage and Townscape Statement which assess the impact of the proposal on various views within the surrounding MSCA. The views assessment shows in View 1 that from the junction of Settles Street and Fordham Street the rear of the London Metropolitan University is visible to the left with the 19 storey 60 commercial road being clearly visible behind the trees to the right. In the proposed situation, the proposal will be visible above the Job centre building. The proposal uses a lighter brick with articulated recesses to break up the massing of the scheme and provide a contrast to the conservation area. Following comments from the GLA the Applicant has submitted a number of facade options on these elevations which incorporate varying styles of perforated brickwork which would vary the articulation across the vertical banding with final details to be secured by way of condition. Whilst there is a transition in scale, officers consider this to be appropriate in providing a marker to Commercial Road and the CAZ.



Figure 7: View of Junction of Fordham Street and Settles Street (proposed)

- 7.72 View 1 includes the recently approved two storey extension at 81-91 Commercial Road and the wireline of the extension to the rear of the Job Centre building which benefits from planning permission but has not yet been built. When built both extensions will help to mitigate the change in scale experienced between the conservation area and the proposed development.
- 7.73 In relation to longer views along Commercial Road in the MSCA, view 5 shows the existing and proposed context at the junction with Hessel Street looking west toward the site. The existing buildings within the MSCA use red brick and the more recent consents such as 81-91 Commercial Road with white cladding are also visible. Beyond this the height increases toward the city. In the proposed situation, the building will be set against taller buildings at the western end of Commercial Road and the proposal represents a suitable transition between the emerging height context. The contrast of the red brick and the lighter materials of the application site clearly mark the distinction between the MSCA and the emerging character along Commercial Road.
- 7.74 View 5 – junction of Commercial Road and Hessel Street (proposed)
- 7.75 With respect to impact upon views from the MSCA officers consider the scheme would have limited impact on the conservation area given the emerging height context and the neutral colour of the scheme.
- 7.76 Whilst the proposals would result in an increase in scale of buildings in the area adjoining the Conservation Area the redevelopment of site, in particular given the quality of the design, the level of active frontage and the use of materials as outlined above, is considered to enhance views along Commercial Road and would preserve the character and appearance of the MSCA. Overall, it is considered that the proposal would sit comfortably in this context and would not cause any adverse harm to the setting of the MSCA.

Neighbour Amenity

- 7.77 Development Plan policies seek to protect neighbour amenity safeguarding privacy, not creating allowing unacceptable levels of noise and ensuring acceptable daylight and sunlight conditions.

Privacy & Outlook

- 7.78 Officers are satisfied that the proposed development has been sensitively designed to ensure acceptable separation distances will exist between the proposed new buildings and existing facing buildings on neighbouring sites.
- 7.79 In terms of separation distances, the proposal will directly adjoin the properties to the north and east and maintains a similar plot coverage to the existing situation and same coverage as the extant permission. At its narrowest point the proposal is 15 metres from the existing flank wall of the London Metropolitan University and is separated by Greenfield Road. To the properties on the south side of Commercial Road, there is a 22 metre separation distance.
- 7.80 The proposal has been designed with no windows on the north and east elevations to allow for future development potential.
- 7.81 The adjacent site to the east, no.79 whilst in commercial use has been considered in terms of whether there would be any impact to this property given the future development potential of this site. The proposal does not include windows to the east or north and therefore there will be no issues regarding direct overlooking to this property. There could be some overshadowing during the late afternoon; however, given the constrained nature of the adjoining site and the urban context this impact is unlikely to be significant given the site is south facing.

- 7.82 Given the location and separation distance of surrounding facing residential properties and the tight urban grain in this part of the Borough, it is considered that the proposal would not unduly result in a detrimental impact upon the amenity of the residents of the surrounding properties in terms of privacy, loss of outlook and sense of enclosure.
- 7.83 Overall, it is considered that the proposed development is suitably designed to ensure privacy is preserved, a level of outlook is maintained and there will be no sense of enclosure to surrounding residential properties.
- 7.84 Daylight, Sunlight & Overshadowing
- 7.85 Guidance relating to daylight and sunlight is contained in the Building Research Establishment (BRE) handbook 'Site Layout Planning for Daylight and Sunlight' (2011).
- 7.86 A number of residential properties surround the site which can be impacted by the development, these have been tested as part of the application, and the results have been independently reviewed on behalf of the Council, these are discussed below.

Daylight

- 7.87 For calculating daylight to neighbouring properties affected by the proposed development, the primary assessment is the vertical sky component (VSC) method of assessment together with the no sky line (NSL) assessment where internal room layouts are known or can reasonably be assumed. These tests measure whether buildings maintain most of the daylight they currently receive
- 7.88 BRE guidance in relation to VSC requires an assessment of the amount of daylight striking the face of a window. The VSC should be at least 27%, or should not be reduced by more than 20% of the former value, to ensure sufficient light is still reaching windows. The NSL calculation takes into account the distribution of daylight within the room, and again, figures should not exhibit a reduction beyond 20% of the former value.
- 7.89 The following properties have been tested for Daylight and Sunlight based on land use and proximity to the site:
- 86A Commercial Road
 - 69 Greenfield Road
 - 88-90 Commercial Road
 - 104 Commercial Road

- 7.90 The results of the independent consultant review undertaken by 'Delva Patman Redler' are summarised below

86A Commercial Road – negligible impact

- 7.91 It is not clear from the submitted Daylight and Sunlight Report which properties are in residential use (serving habitable rooms) and therefore the first and second floor level facing the site have been assessed given the ground floor level is currently in commercial use.
- 7.92 Of the windows assessed, all would meet the BRE guidelines and will not face a reduction in VSC of more than 20% beyond the existing VSC. The results also show there will be no change in daylight distribution for the rooms in 86A Commercial Road.

69 Greenfield Road – negligible impact

- 7.93 69 Greenfield Road is understood to be a block of flats on the corner of Greenfield Road and Coke Street. All windows facing the site have been assessed for daylight and sunlight impacts including those at ground floor level.
- 7.94 It is noted that the ground to second floor windows facing directly south, achieve a VSC of less than 27% in the existing situation. Despite this, all the windows would meet the BRE guidelines in terms of not facing a reduction in VSC of more than 20% beyond the existing VSC. In addition, there would be no effect on the daylight distribution within the rooms.
- 7.95 *88-90 Commercial Road – negligible to minor adverse impact*
- 7.96 The existing site is three storeys in height. However, the site has various consents; including the most recent consent (with planning reference PA/14/03302) for the erection of a five storey building with office/retail at basement and ground floor and residential to the upper floor levels and rear of the ground floor. The application was approved on 22.05.2015 but has not been fully built out. The consented proposal follows the same building line as the existing site (facing Commercial Road) and is an additional 2 storeys in height. The Daylight and Sunlight Report analyses the impact of the proposal on this consented scheme given this represents the worst case scenario.
- 7.97 Three windows of the 13 tested would experience a reduction in VSC of more than 20% compared to the existing situation. The windows serve two rooms and will experience a reduction of 20.26%, 20.87% and 20.31% respectively which is only a very small amount above the 20% reduction. It is relevant that all in the 'proposed development' scenario will be above 20% VSC and will therefore continue to maintain a good level of daylight for a dense urban location such as this. In terms of daylight distribution, there will be minimal loss to the daylight distribution within the rooms. In addition, it should be noted that the site is located in a changing area and that the surrounding sites have development potential. On this basis the impact to 88-90 Commercial Road is considered to sit between a negligible to minor adverse impact.

104 Commercial Road – negligible to minor adverse impact

- 7.98 Two windows of the 9 tested would experience a reduction in VSC of more than 20% compared to the existing situation. The windows serve four rooms and will experience a reduction of 20.93%, and 21.25% respectively which is considered only a very small amount above the 20% reduction. As with 88-90 it is relevant that all in the 'proposed development' scenario will be above 20% VSC and will therefore continue to maintain a good level of daylight for a dense urban location such as this. In terms of daylight distribution, there will be minimal loss to the daylight distribution within the rooms. In addition, it should be noted that the site is located in a changing area and that the surrounding sites have development potential. On this basis the impact to 104 Commercial Road is considered to sit between a negligible to minor adverse impact.

Sunlight

- 7.99 The BRE report recommends that for existing buildings, sunlight should be assessed for all main living rooms of dwellings and conservatories, if they have a window facing within 90 degrees of due south. If the centre of the window can receive more than one quarter of annual probable sunlight hours (APSH), including at least 5% of annual probable sunlight hours in the winter months between 21 September and 21 March, then the rooms should still receive enough sunlight. If the available sunlight hours are both less than the amount above and less than 0.8 times their former value then the occupants of the existing building will notice the loss of sunlight.

7.100 The submitted reports outline the sunlighting conditions for the following residential properties which are relevant for assessment:

69 Greenfield Road – negligible impact

7.101 The only residential property tested for sunlight is 69 Greenfield Road given these are the only windows facing 90 degrees due south. The Daylight and Sunlight Report shows that there is full compliance with the standards for both annual and winter sunlight levels. The impact on sunlight levels is negligible.

Conclusion

7.102 The proposed development shows almost full compliance with the required daylight and sunlight standards. Two windows will experience small reductions in daylight levels; however, these are only marginally below the standards and they continue to achieve good levels of daylight resulting in a negligible to minor adverse impact to 88-90 Commercial Road. Given the overall impact of the proposal on surrounding properties is fairly negligible, the impact of the proposal on the amenity of surrounding properties is acceptable, in accordance with Managing Development Document (2013) policy DM25.

Overshadowing

7.103 In terms of permanent overshadowing, the BRE guidance in relation to new gardens and amenity areas states that “it is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity space should receive at least 2 hours of sunlight of 21 March”.

7.104 There are no existing amenity spaces or park areas within close proximity to the development.

Noise & Vibration

7.105 The application is supported by a Noise Assessment. The hotel should not cause unacceptable noise for existing or future residents given distance of nearby residential uses.. Subject to a recommended condition, noise from mechanical plant should be managed to acceptable levels and the proposals should not worsen the noise environment for existing residents.

Construction Impacts

7.106 Demolition and construction activities are likely to cause some additional noise and disturbance, additional traffic generation and dust. In accordance with relevant Development Plan policies, a number of conditions are recommended to minimise these impacts. These would control working hours and require the approval and implementation of Construction Environmental Management Plan and a Construction Logistics Plan.

Transport

7.107 Development Plan policies promote sustainable modes of travel and limit car parking to essential user needs. They also seek to secure safe and appropriate servicing.

Vehicular, pedestrian and cycle access

7.108 The applicant has proposed to enter a legal agreement to restrict the issuing of business permits to future occupants in order to ensure that the proposal is car free. This is supported by LBTH highways and TfL. The restriction on the issue of parking permits for business occupants will be secured through the section 106 legal agreement.

Car Parking and access

- 7.109 The applicant has proposed to enter a legal agreement to restrict the issuing of business permits to future occupants in order to ensure that the proposal is car free. This is supported by LBTH highways and TfL. The restriction on the issue of parking permits for business occupants will be secured through the section 106 legal agreement.
- 7.110 Given the constrained nature of the site, there is limited scope for the inclusion of a disabled bay to be provided on site. The applicant is willing to fund an on street accessible bay and a commuted sum of £5000 has been agreed which is included in the S106 agreement to cover the costs of providing an on street bay in close proximity to the site.
- 7.111 In addition, a small amount of land around the edge of the building on Greenfield Road and Commercial Road (including the chamfered corner) will be subject to a stopping up order between TfL and the applicant. This was agreed in principle by the applicant and TfL during the pre-application stage and has been subsequently confirmed during the application process.

Servicing and deliveries

- 7.112 It is proposed to service the development on street as per the existing and extant arrangements on Greenfield Road. All deliveries and serving associated with the site would be stored within a back of house area with the number of trips generated on a weekly basis likely to be daily for food, drink and linen, and weekly for other services such as stationary and cleaning materials, all up to a maximum of 15 minutes per day for each service. A number of measures are proposed to be implemented as per the submitted Delivery and Servicing Plan and this will be secured via a compliance condition.
- 7.113 The refuse collections are to occur from the access at the north west of the site. Officers note an error in the submitted information in the Planning Statement and officers understand that the bin store will be located at ground level rather than the basement as suggested. The bins will be wheeled to the collection point on collection day. The arrangement is presented correctly in the proposed ground floor plan. Further assessment of the proposed waste arrangements are discussed in the 'waste' section of the report.

Walking and the public realm

- 7.114 During the course of the previous application, concerns were raised regarding pedestrian permeability and the public realm around the site given the chamfered corner and structural column which had the potential to impede pedestrian movements. Improvements were made to the design including reducing the size of the structural column to ensure that pedestrians/users of the public realm are not restricted in their movement. This amendment has been carried forward in the revised scheme however concerns were echoed by the GLA following consultation on the current application. Further clarification of pavement widths was sought and following this all parties were in agreement that the arrangement as proposed is considered acceptable, given it improves on the existing poor quality public realm and provides better permeability and more meaningful public realm around the site and allows for inclusive access.

Cycling

- 7.115 The applicant has proposed a revised 12 cycle parking spaces. This meets the London Plan FALP requirement for long term cycle parking for hotel use.
- 7.116 The bike store is accessed via the ground floor lobby entrance. The type of stands have been amended from double stacked to diagonally stacked stands whilst reducing the overall spaces

by two is much more widely accessible. In addition, the design of the cycle stands (with reference to the London Cycling Design Standards (LCDS)) is required by condition.

- 7.117 Given the constrained nature of the application site, the applicant is unable to provide cycle parking in the public realm for visitors. Whilst the London Plan requires developers to provide short stay cycle parking as part of development proposals, it is recognised in this instance that this would not be feasible. In order to ensure there is cycle parking provision for visitors, the applicant has agreed to enter into a highway agreement with TfL to provide two additional 'Sheffield' cycle stands in close proximity to the site. This will be secured by way of a condition through a highways agreement.

Trip Generation

- 7.118 A multi-modal assessment has been undertaken and is considered acceptable by LBTH Highways officers and TfL.

Demolition and Construction Traffic

- 7.119 Should the application be approved, the impact on the road network from demolition and construction traffic would be controlled by way of conditions requiring the submission and approval of Demolition and Construction Management Plans. The Demolition and Construction Management Plan will need to consider the impact on pedestrians, cyclists and vehicles as well as fully considering the impact on other developments in close proximity.

Summary

- 7.120 Subject to the above it is considered the proposal would be acceptable in terms of supporting sustainable modes of transport, it should have no significant impacts on the safety or capacity of the highways network, in accordance with NPPF (2012) policy 6.1, London Plan (2015) policy 6.3, Core Strategy (2010) policies SP08 & SP09, and Managing Development Document (2013) policies DM20 & DM22.

Environment

Environmental Impact Assessment

- 7.121 In February 2019, the Council confirmed that an Environmental Screening Opinion was not necessary for this application.

Energy & Environmental Sustainability

- 7.122 The application is supported by an Energy Statement. This sets out how the proposed development addresses policy requirements to reduce the site's contribution to climate change by minimising the emissions of CO₂. The strategy is based on:

- Being Lean: good levels of thermal insulation, the use of mechanical ventilation that includes heat recovery (thus reducing heating demand), the use of a communal? heating system, high efficiency plant, low energy lighting and other measures. The proposed measures are anticipated to deliver cumulative CO₂ savings of 103 tonnes per annum.
- Being Clean: the potential to facilitate a possible future connection to a wider district heating network is accommodated in the proposal
- Being Green: the provision of PVs (36sqm array) on the south and west side of the roof of the building.

- 7.123 The above strategy is in accordance with relevant Development Plan policies and guidance. Together, the measures would achieve a 26% improvement over the 2013 Building Regulation standards. Policy DM29 requires a 45% reduction. It is therefore recommended that, in

accordance with policy and supporting guidance, a s106 obligation secures a financial contribution of £124,650 towards carbon offsetting projects in the Borough.

- 7.124 The GLA raised concerns within their Stage I response that the energy strategy does not accord with London Plan policy 5.2. This has been resolved subsequently.
- 7.125 In terms of the local district heating connection, the GLA has identified that according to the London Heat Map the location of the site is within a district heating opportunity area and in proximity to a proposed network. The proposed development requires future proofing for connection to potential district heating networks and should include measures to ensure this. The Applicant has sufficiently demonstrated that capped connections for future proofing can be provided either side of the building façade walls. This is acceptable to officers.
- 7.126 The GLA required further detail regarding the site heating network where all uses will be connected on site and future proofed. The applicant has confirmed that they are providing VRF heat pumps on the roof for heating to all areas and air source heat pumps on the roof to generate hot water. A plan which illustrates the heat pump location at roof and basement levels has also been provided and space heating will be provided via the air source heat pumps with comfort cooling. This information is satisfactory.
- 7.127 The applicant confirms that they are providing VRF heat pumps on the roof for heating to all areas and air source heat pumps on the roof to generate hot water. Further details regarding the PV were also submitted and will be secured via condition. The Applicant is also committed to achieving a BREEAM rating of 'Excellent' and it is recommended that the submission of a final certificate to demonstrate that the 'Excellent' level is achieved is secured via condition.

Air Quality

- 7.128 Development Plan policies require major developments to be accompanied by assessments which demonstrate that the proposed use(s) are acceptable and show how development would prevent or reduce air pollution.
- 7.129 The main source of pollutants is road traffic. The air quality monitoring data from monitoring sites in close proximity to the application site demonstrates that existing air quality consistently exceeds the annual mean NO₂ air quality objective at road side locations close to Commercial Road, but would be expected to reduce away from the roadside and at more elevated floor levels.
- 7.130 Given the proposed development is for hotel use the proposal would not introduce new residential exposure. However, employees, visitors and patrons to the development could be exposed to elevated concentrations of air pollutants. To protect future workers a mechanical ventilation system fitted with rooftop mounted air handling units.
- 7.131 The Air Quality Assessment states that the development will have a negligible impact on the local air quality; however at this stage there is insufficient information to assess whether the building will be air quality neutral.
- 7.132 The LBTH Air Quality officer reviewed the Air Quality Assessment and requires a number of conditions be secured with regards to Air Quality.
- 7.133 It is recommended that a Construction Environmental Management Plan is secured by way of a planning condition.

Waste

- 7.134 Development Plan policies require adequate refuse and recycling storage.

7.135 All commercial waste and recycling is to be stored within a storage area on the ground floor with direct access from the north-west corner of building to Greenfield Road. The store has been sized appropriately, taking account of Council guidance.

Biodiversity

7.136 Development Plan policies seek to safeguard and where possible enhance biodiversity value.

7.137 The existing site has limited ecological value given the site consists of an existing building and there will be no significant impacts on biodiversity as a result of the proposal.

7.138 In terms of biodiversity enhancements, the applicant has investigated the option of providing a biodiverse roof; however, given the roof will largely accommodate plant equipment and the site is constrained, it will not be feasible to provide a biodiverse roof in this instance.

7.139 The applicant has engaged with the biodiversity officer and has provided an indicative plan showing where bird, bat and invertebrate boxes could be located at roof level. The roof level has sufficient space to accommodate the suggested boxes and will contribute to LBAP targets. The Council's Biodiversity officer has confirmed that a condition would be appropriate that secures as a minimum 2 bat boxes, 2 sparrow terrace nest boxes, 2 insect boxes and 6 nest boxes for swifts.

7.140 The Council's Biodiversity officer is satisfied that with appropriate conditions the proposed development would result in a net gain in biodiversity. Accordingly, the proposal will serve to improve the biodiversity value as sought by policy SP04 of the Core Strategy (2010) and DM11 of the Managing Development Document (2013).

Flood Risk & Drainage

7.141 Development Plan policies seek to manage flood risk and encourage the use of Sustainable Urban Drainage.

7.142 In relation to surface water run-off, the site is already built upon and therefore subject to a planning condition to ensure the scheme incorporates Sustainable Drainage Measures in accordance with the London Plan's hierarchy the proposal is considered acceptable in accordance with adopted policy NPPF, Policies 5.12, 5.13 of the London Plan, Policies SP04 of the Core Strategy (2010) and DM13 of the Managing Development Document (2013).

7.143 Thames Water advises that conditions could also appropriately address the matters raised regarding the site drainage strategy.

7.144 In summary, subject to the inclusion of conditions to secure the above, the proposed development complies with the NPPF, Policies 5.12 and 5.13 of the London Plan and Policy SP04 of the Core Strategy (2010).

Land Contamination

7.145 Subject to standard conditions, the proposals are acceptable from a land contamination perspective and that any contamination that is identified can be satisfactorily dealt with.

Infrastructure Impact

7.146 It is estimated that the proposed development would be liable for Tower Hamlets Community Infrastructure Levy (CIL) payments of approximately £ 934,742,00 and Mayor of London CIL of approximately £251,400,00.

7.147 Alongside CIL, Development Plan policies seek financial contributions to be secured by way of planning obligations to offset the likely impacts of the proposed development on local services and infrastructure.

7.148 The applicant has agreed to meet all of the financial contributions that are sought by the Council's Planning Obligations SPD, as follows:

- £25,632 towards construction phase employment skills training
- £31,824 towards end-user phase employment skills training
- £124,650 toward carbon emission off-setting

Human Rights & Equalities

7.149 The proposal does not raise any unique human rights or equalities implications. The balance between individual rights and the wider public interest has been carefully considered and officers consider it to be acceptable.

7.150 The proposed provision of the hotel meets inclusive design standards and 16 rooms (over 10%) would be wheelchair accessible. These standards would benefit future employees and visitors, including disabled people, elderly people and parents/carers with children.

7.151 The proposed development would not result in adverse impacts upon equality or social cohesion.

8. RECOMMENDATION

8.1 That subject to any direction by the Mayor of London, **conditional planning permission is GRANTED** subject to the prior completion of a legal agreement to secure the following planning obligations:

8.2 Financial obligations

- a)£25,632 towards construction phase employment skills training
- b)£31,824 towards end-user phase employment skills training
- c)£124,650 toward carbon emission off-setting
- d)£5,000 toward accessible bays
- e)£6,000 monitoring fee

Total financial contributions: £188,106, 00

8.3 Non-financial obligations:

- a. Access to employment
 - 20% local procurement
 - 20% local labour in construction
 - 3 construction phase apprenticeships
 - 1 x end-user phase apprenticeships
- b. Transport
 - Car Free development (commercial)
 - Approval and implementation of Travel Plan
 - No coach bookings

- Crossrail top up (formula)
- S278 Agreement (works to Greenfield Road and Commercial Road).

c. Compliance with Considerate Constructors Scheme

d. 90 Day lets

8.4 That the Corporate Director of Place is delegated the power to negotiate the legal agreement. If within three months of the resolution the legal agreement has not been completed, the Corporate Director for Place is delegated power to refuse planning permission.

8.5 That the Corporate Director of Place is delegated the power to impose conditions and informatives to address the following matters:

8.6 Planning Conditions

Prior to Commencement' Conditions:

1. Demolition and Construction Management Plan including dust and emissions management plan;
2. Site wide drainage scheme in consultation with Thames Water including sustainable drainage measures;
3. Ground contamination remediation and mitigation
4. Air Quality and Air Quality Neutral Assessment

Prior to completion of superstructure works conditions:

5. Biodiversity mitigation and enhancements including bird/bat/insect boxes
6. Details of all external plant and machinery and PV panels
7. Details of all external facing materials including samples
8. Typical elevation details and ground floor elevations at 1:50 scale
9. Details of public realm treatments/hard landscaping including CCTV and lighting
10. Scheme of highway works surrounding the site (Section 278 agreement)
11. Secure by Design Accreditation

Prior to Occupation' Conditions:

12. Surface water management system
13. Full Delivery, servicing and management plan
14. Delivery of BREEAM Excellent
15. Works to the highway (delivery of 2 Sheffield stands and stopping up order)
16. Air quality ventilation scheme

Compliance' Conditions:

17. Permission valid for 3yrs;
18. Development in accordance with approved plans;
19. Hours of construction;
20. Refuse stores to be provided prior to occupation;
21. Provision of cycle stores for the life of the development;
22. Energy strategy achieving 26% carbon reduction;
23. Cycle Parking
24. Plant Noise
25. Archaeological investigation (in consultation with Historic England);
26. 16 wheelchair accessible units (10% of overall provision);
27. Lets of 90 days

Informatives

1. Permission subject to legal agreement.
2. Development is CIL liable.
3. Thames Water – proximity to assets.

Appendix 1

List of plans for approval

Schedule of Drawings

A-000-000 Rev PL0	Location Plan
A-025-099 Rev PL0	Existing Basement Plan
A-025-000 Rev PL0	Existing Ground Floor Plan
A-025-001 Rev PL0	Existing First Floor Plan
A-025-002 Rev PL0	Existing Second Floor Plan
A-025-003 Rev PL0	Existing Third Floor Plan
A-025-004 Rev PL0	Existing Roof Plan
A-025-005 Rev PL0	Existing Elevations
A-025-006 Rev PL0	Existing Sections
A-025-100 Rev PL0	Existing Site Plan
A-100-099 Rev PL0	Proposed Basement Plan
A-100-000 Rev PL1	Proposed Ground Floor Plan
A-100-001 Rev PL0	Proposed 1st Floor Plan
A-100-002 Rev PL0	Proposed 2nd Floor to 13th Floor Plan
A-100-003 Rev PL0	Proposed Roof Plan
A-100-100 Rev PL0	Proposed Site Plan
A-110-000 Rev PL0	Proposed Elevations West and South
A-110-001 Rev PL0	Proposed Elevations East and North
A-120-000 Rev PL0	Proposed Section A
A-120-001 Rev PL0	Proposed Section B
A-500-001 Rev SK1	Façade/window detail

Schedule of Documents

Design and Access Statement, prepared by Dexter Moren Associates; dated October 2018
Statement of Community Engagement, prepared by Icen Projects; dated October 2018
Heritage and Townscape Assessment, prepared by KM Heritage; dated October 2018
Hotel Needs Assessment, prepared by Michel & Taylor; dated October 2018
Marketing Summary Report, prepared by Strettons; dated October 2018
Transport Statement prepared by Icen Projects; dated October 2018
Framework Travel Plan prepared by Icen Projects; dated October 2018
Delivery and Servicing prepared by Icen Projects; dated October 2018
Utility Services Report no 603364 Issue 1, prepared by FHP; dated 04.10.2018
Daylight and Sunlight Assessment, prepared by Point 2 Surveyors; dated October 2018
Noise and Vibration Assessment, prepared by Ramboll Environ; dated October 2018
Air Quality Assessment, prepared by Ramboll Environ; dated 18.10.2018
Construction Management Plan, prepared by Regal Homes Construction; dated 23.10.2018
Sustainability Strategy, prepared by Ramboll Environ; dated March 2019
Energy Statement Rev 5, prepared by Flatt; dated October 2018
Ecological Impact Assessment, prepared by Ramboll Environ; dated 18.10.2018
Surface Water Drainage Report, prepared by Ramboll; dated 07.02.2019
Historic Environment Assessment, prepared by MOLA; dated March 2017
Written Scheme of Investigation for an Archaeological Watching Brief Issue 3, prepared by MOLA; dated 28.02.2018

Land Contamination Assessment, prepared by Ramboll; dated 17.10.2018
Verified Views Methodology Report, prepared by Cityscape Digital; dated October 2018

Additional documents

2806A/SK/02 Rev P5 Proposed Roof plant Space Planning
Bellsure Verti 45 Product Specification
Staycity Public Area Proposal

Appendix 2

Selection of plans and images



LOOKING EAST ALONG COMMERCIAL ROAD



PROPOSED VIEW 1



PROPOSED VIEW 2



PROPOSED VIEW 3



PROPOSED VIEW 4



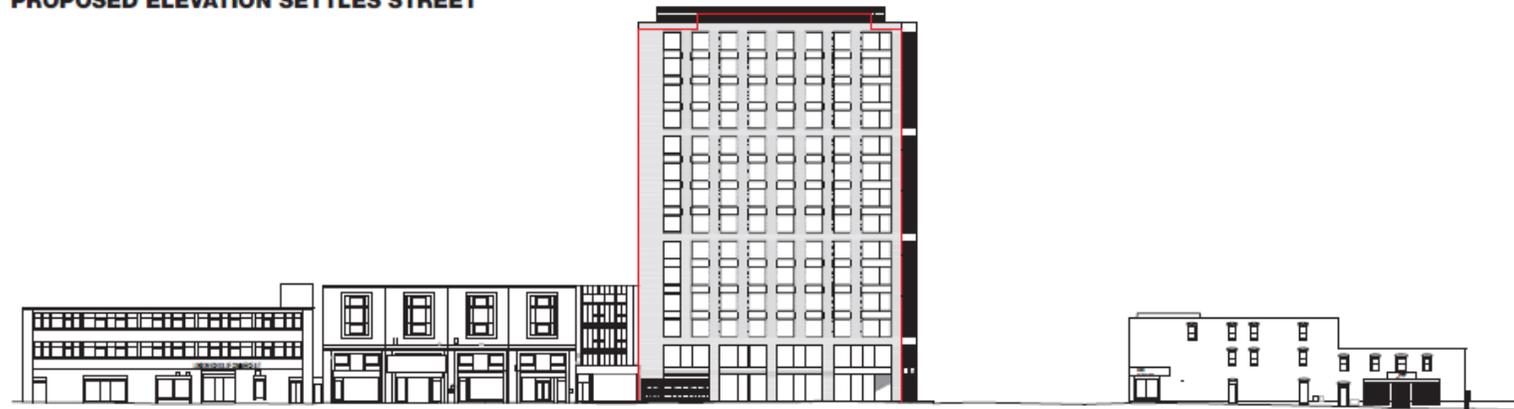
PROPOSED VIEW 5

DESIGN PROPOSAL

**CONTEXT:
PROPOSED CONTEXT
ELEVATIONS**



PROPOSED ELEVATION SETTLES STREET



PROPOSED ELEVATION GREENFIELD ROAD



PROPOSED ELEVATION COMMERCIAL ROAD