Committee: Development	<b>Date:</b> 24/08/2011	Classification: Unrestricted	Agenda Item No:	
Report of: Corporate Director of Development and Renewal  Case Officer: Adam Williams		Title: Planning Application for Decision		
		Ref No: PA/11/00998  Ward(s): Blackwall and Cubitt Town		

## 1. APPLICATION DETAILS

**Location:** The Watermans Arms Public House, 1 Glenaffric Avenue, London,

E14 3BW

**Existing Use:** Public House (Use Class A4)

**Proposal:** Change of use of the upper 1st and 2nd floors of The Watermans

Arms from ancillary public house accommodation (Use Class A4) to a backpackers' hostel accommodation (Sui Generis), comprising 8no.

dormitories with a total of 83no. beds.

**Drawing Nos:** 0055-GA(00)001 (Rev P0); 0055-GA(00)002 (Rev P0); 0055-

GA(00)003 (Rev P0); 0055-GA(00)004 (Rev P0); 0055-GA(00)005 (Rev P0); 0055-GA(00)006 (Rev P0); 0055-GA(00)007 (Rev P0); 0055-GA(00)008 (Rev P0); 0055-GA(00)100 (Rev P0); 0055-GA(00)101 (Rev P0); 0055-GA(00)102 (Rev P0); 0055-GA(00)200 (Rev P0); 0055-GA(00)201 (Rev P0); 0055-SK(00)001 (Rev P0); 0055-SK(00)002 (Rev P0); 0055-SK(00)003 (Rev P0); Supporting Statement, dated 28/02/2011; Supporting Statement 02 The

Watermans Arms; Additional Information document received 16 June

2011.

**Applicant:** Mr Ben Stackhouse **Historic Building:** Grade II Listed

Conservation Area: Island Gardens Conservation Area

## 2. SUMMARY OF MATERIAL PLANNING CONSIDERATIONS

- 2.1 The local planning authority has considered the particular circumstances of this application against the Council's approved planning policies contained in the London Borough of Tower Hamlets adopted Core Strategy, Unitary Development Plan, associated supplementary planning guidance, the London Plan and Government Planning Policy Guidance and has found that:
  - a). The proposed 83 bed backpackers' hostel would result in the overdevelopment of the site, in turn resulting in the provision of sub-standard guest accommodation. The proposal therefore fails to meet the requirements of saved Policy HSG21 of the Unitary Development Plan (1998). This policy requires hostel accommodation to have adequate indoor and outdoor amenity space, have rooms of an adequate size and meet the requirements of all other relevant policies and planning standards.

# LOCAL GOVERNMENT ACT 2000 (Section 97) LIST OF BACKGROUND PAPERS USED IN THE DRAFTING OF THIS REPORT

- b). The proposed 83 bed backpackers' hostel would have an unacceptable impact on the amenity of neighbouring residents, which is contrary to the requirements of Policy SP10(4) of the adopted Core Strategy (2010), saved Policies DEV2 and DEV50 of the Unitary Development Plan (1998) and Policies DEV1 and DEV10 of the Interim Planning Guidance (2007). These policies seek to ensure that development proposals do not result in undue noise disturbance and protect the amenity of surrounding existing and future residents and building occupants, as well as protect the amenity of the surrounding public realm.
- c). The proposed backpackers' hostel would be located outside of a designated Town Centre in an area with limited local facilities and poor access to public transport, with site having a Public Transport Accessibility Level (PTAL) of 2. As such, the proposal is contrary to Policy SP06(4) of the Council's adopted Core Strategy (2010), Policy 4.5 of The London Plan (2011) and saved Policy HSG21 of the Unitary Development Plan (1998). These policies seek to ensure that visitor accommodation is located within appropriate Town Centre locations with good access to public transport.
- d). The positioning of the proposed waste and recyclables storage bins on the footpath is contrary to the requirements of Policy SP05(1) of the Council's adopted Core Strategy (2010), Policy 5.17(E) of The London Plan (2011) and Policy DEV15 of the Interim Planning Guidance (2007). These policies seek to ensure that development includes adequate waste and recyclables storage within an internal room or an area within the development that is screened from the street in perpetuity.

# 3. RECOMMENDATION

3.1 That the Committee resolve to **REFUSE** planning permission.

# 4. PROPOSAL AND LOCATION DETAILS

# **Proposal**

- 4.1 The application proposes the change of use of the 1<sup>st</sup> and 2<sup>nd</sup> floors of The Watermans Arms Public House from ancillary public house accommodation (Use Class A4) to backpackers' hostel accommodation (Sui Generis), comprising 8 dormitories with a total of 83 beds.
- 4.2 The proposed hostel would operate between the hours of 11:00 and 23:00 Monday to Saturday, and 12:00 to 22:30 on Sundays and Bank Holidays, although guests would be able to enter and exit the premises at any time, 24 hours a day. The hostel would also employ 5no. full-time and 5no. part-time staff.

## Site and Surroundings

- 4.3 The application site is a free-standing Grade II listed three-storey Public House of Regency design that is bounded by the public highway at Glenaffric Avenue to the north, the public highway at Saunders Ness Road to the east, and an un-listed two storey terrace of houses at 3-13 Glenaffric Avenue (odd).
- 4.4 The application site is located within the Island Gardens Conservation Area, which was designated in March 1971 and covers the south end of the Isle of Dogs, primarily focusing on the statutorily listed open space, developed to protect the axial views across the river of the Royal Naval College and the Queen's House in Greenwich. The application site lies a short distance to the south-east of the Grade II\* listed Church of Christ and St John.

## 4.5 The English Heritage listing description for the site is as follows:

"Mid C19. Exterior now rendered and painted red, tiled ground floor, roof not visible. Blocking course has Waterman's Arms in large letters. Painted signboard at corner. Facade to Glenaffric Avenue, 3 storeys, 3 windows, those of 1st floor, French casements with labels, centre with triangular pediment. Cast iron balcony to each window. Above, band, sash windows (one blank) with glazing bars and architraves 1 storey portion at western side.

Facade to Saunders Ness Road similar but no blank on 2nd floor and continuous cast iron balcony on scrolled brackets to 1st floor windows.

The Waterman's Arms form a group with Christ Church and Christ Church Vicarage Manchester Road, and with the Newcastle Craw Dock, Saunders Ness Road."

# **Planning History**

## 4.6 PA/04/01233

On 12 October 2004 planning permission was **refused** for a retrospective application for the provision of 7 new off-street car parking spaces with access off Saunders Ness Road and the removal of two main limbs of trees on site. The decision was appealed and the appeal was subsequently **dismissed**.

## 4.7 PA/11/00078 and PA/11/00189

On 14 March 2011 advertisement consent and listed building consent were **granted** for the display of 11 individual signs on the west, north and east elevations of the Grade II listed building.

# 4.8 PA/11/00127 and PA/11/00128

On 5 April 2011 planning permission and listed building consent were **granted** for an application for listed building consent internal and external works to the Grade II listed Public House including the refurbishment of the public toilets, refurbishment and alteration to the bar backfitting, internal decorations, new timber boarded flooring, a new internal lobby complete with new external double doors, a set of new double doors dividing the lower area from the main bar area and the re-configuration of the existing external steps to the lower bar to form ambulant disabled compliant risers complete with a metal balustrade, the removal of the existing double entrance doors to the public house as indicated on submitted drawings, and the installation of four lanterns adjacent to the entrances on the front elevation. The application also seeks approval for flush fire doors to be re-instated within the site and for the retention of the existing secondary glazing to ground floor.

#### 4.9 PA/11/00268

On 14 April 2011 the Council **refused** an application for a certificate of lawful development in respect of the existing use of the 1st and 2nd upper floors of The Waterman Arms Public House as hotel (Use Class C1) accommodation.

#### 4.10 PA/11/00269

On 26 April 2011 listed building consent was **granted** for proposed non-structural internal works, including the removal of 1no. en suite bathroom at first floor level and 2no. en suite bathrooms at second floor level installed in 2004, the installation of temporary cubicle partitions together with 3no. showers, 2no. WCs and 2no. sinks within Room 5 at first floor level and general internal surface decoration works at ground, first and second floor level.

## 4.11 PA/11/00955

On 16 June 2011 the Council **approved** details in respect of the discharge of conditions 3a (external colouring), 3b (stone step sample), 3c (railings details), 3d (lantern fixing detail) and 3e (window details) of planning permission dated 05/04/11, reference PA/11/00128.

## 4.12 ENF/10/00808

The Council is presently conducting an enforcement investigation in respect of an alleged unauthorised change of use to hostel use and associated operational works.

# 5. POLICY FRAMEWORK

5.1 For details of the status of relevant policies see the front sheet for "Planning Applications for Determination" agenda items. The following policies are relevant to the application:

# 5.2 **The London Plan (2011)**

Policies: 4.5 London's Visitor Infrastructure

5.17 Waste Capacity

6.9 Cycling

# 5.3 Adopted Core Strategy (2010)

Policies: SP05 Dealing With Waste

SP06 Delivering Successful Employment Hubs

LAP 7&8 Cubitt Town

# 5.4 Unitary Development Plan 1998 (as saved September 2007)

Policies: DEV2 General Environmental Requirements

DEV 50 Noise

HSG21 Hostel Accommodation

# 5.5 Interim Planning Guidance for the Purposes of Development Control (2007)

Policies: DEV1 Amenity

DEV10 Disturbance from Noise Pollution DEV15 Waste and Recyclables Storage

DEV16 Walking and Cycling Routes and Facilities

DEV17 Transport Assessments RT6 Loss of Public Houses

# 5.6 **Supplementary Planning Guidance**

Document: LBTH Residential Space Supplementary Planning Guidance (1998)

## 6. CONSULTATION RESPONSE

- 6.1 The views of officers within the Directorate of Development and Renewal are expressed in the MATERIAL PLANNING CONSIDERATIONS section below.
- 6.2 The following were consulted regarding the application:

# **London Borough of Tower Hamlets – Transportation & Highways**

6.3 Highways raise objections to the location of wheelie bins on the public highway (Saunders Ness Road), as shown on the proposed ground floor plan. An internal storage location must be found. Whilst it is acknowledged that the cellar door is an existing arrangement, it opens out over the public highway which contravenes the Highways Act, 1980 and cannot be supported. Notwithstanding the above, Highways recommend that any future planning permission be secured as car and permit free.

# **London Borough of Tower Hamlets – Environmental Health (Noise & Vibration)**

6.4 Given the applicant's proposal to operate a 24 hour hostel there is a concern that a nuisance can potentially arise from community and environmental noise as a result of the guests accessing and egressing the premises particularly during sensitive hours during the night. This will cause a disturbance to residents in the vicinity and affect their right to quiet enjoyment. Although there have not been any noise complaints about the Watermans Arms Public House, Environmental Health did however receive a high volume of complaints in the past dating back to June 2010 and before.

# **Thames Water Authority**

6.5 Thames Water would advise that with regard to sewerage and water infrastructure we would not have any objection to the above planning application.

## 7. LOCAL REPRESENTATION

- 7.1 A total of 38 neighbouring properties within the area shown on the map appended to this report were directly notified about the application. A site notice was also displayed and the application was advertised in East End Life.
- 7.2 The total number of representations received from neighbours and local groups in response to notification and publicity of the application were as follows:

No of individual responses: 14 Objecting: 6 Supporting: 8
No of petitions received: 1 objecting containing 40 signatories
1 supporting containing 26 signatories

- 7.3 The following objections were raised in representations that are addressed in the Material Planning Considerations section of this report:
  - a). A hostel with in excess of 80 beds would drastically change the residential atmosphere of this area.
  - b). The majority of guests would be accommodated in dormitories 4, 5, 7 and 8, which have windows directly opposite Cumberland Mills Square, some 30 feet distant, and there is serious concern of the likelihood of noise late at night from these dormitories and downstairs bar area.
  - c). The scale and density of the proposed accommodation poses too high a risk of disturbance.
  - d). The proposed on-site toilet and shower facilities appear to be inadequate to accommodate 83 guests.
  - e). The proposed refuse storage facilities (two large wheelie bins) appear inadequate for the premises at full occupancy (581 bed nights per week), together with the refuse generated from the public house use.
  - f). The proposal does not adequately demonstrate how the premises could be safely evacuated by 83 guests in the event of a fire.
  - g). The proposal does not adequately demonstrate whether the hostel would be managed 24 hours per day by a qualified individual who is resident at the premises, as a lack of such management could have a significant negative impact on local residents.
  - h). The proposal would likely result in a significant increase in servicing deliveries, which given the current on-street servicing arrangements and proximity to a number of schools, raises safety concerns.
  - i). Given the nature of the proposed hostel, it is likely that guests will return to the premises late each night, which will impact significantly on local residents.

- j). The proposal would result in more people smoking outside the premises, which would result in noise disturbance and looks unsightly.
- k). It is understood that the premises is already providing accommodation to some backpackers and in the past two months there have been 7 forced entries to local houses, which appears not to be coincidental.
- I). The possibility of the accommodation being used to house illegal immigrants should not be excluded.
- m). The proprietor is already letting bunks in its upstairs spaces and this has resulted in an increase in noise in Saunders Ness Road.
- 7.4 Officer Comments: Points (a), (b), (c), (g), (i), (j) and (m) are addressed in the 'Amenity' section of this report. Points (d) and (f) are addressed in the 'Land Use' section of this report. Point (e) above is addressed in the 'Highways' section of this report. With regard to point (k) above, it is beyond the Case Officer's remit to speculate as to whether any alleged recent criminal activity near site is as a result of operations at the application site. In addition, with regard to point (l) above, it is beyond the Case Officer's remit to speculate as to the type of guest that the proposed hostel would accommodate.
- 7.5 The following statements of support were raised in representations that are addressed in the Material Planning Considerations section of this report:
  - (i) The hostel and pub are well managed and when the hostel has been full it has not impacted on neighbouring residents.
  - (ii) The users of the hostel are mostly of a more mature age range and tend not to be 'drinkers'.
  - (iii) The pub / hostel has become a much needed local community centre, with morning and daytime coffee lounge and yoga classes.
  - (iv) The proposal will enhance the neighbourhood as there is a need for a high quality public house in the area.
  - (v) The CCTV and 24 hour staffing at the site has made local residents feel safer.
  - (vi) The hostel offers affordable and high quality accommodation that family and friends of local residents could use when visiting.
  - (vii)The proposal will bring new life and business to the area.
  - (viii) The proposal will benefit local shops and businesses.
  - (ix) The proposal contributes to local employment.
  - (x) The proposal will retain the pub in active use when a number of other local pubs have had to close.

## 8. MATERIAL PLANNING CONSIDERATIONS

8.1 The main planning issues raised by the application that the committee must consider are:

## 1. Land Use

Intensity and location of the proposed backpackers' hostel use.

#### 2. Residential Amenity

Impact on the amenity of the surrounding area.

## 3. Highways Impacts

Impact on the public highway from waste and recyclables storage and servicing.

# **Land Use**

8.2 Policy SP06(4) of the Council's adopted Core Strategy (2010) seeks to concentrate visitor accommodation in the Central Activities Zone (CAZ), City Fringe Activity Area, Canary Wharf Activity Area and Major and District Centres. Policy 4.5 of The London Plan (2011) seeks to ensure that visitor accommodation is located within appropriate locations, specifically within town centres and opportunity and intensification areas, where there is good public transport access to central London and international and national transport termini. Saved Policy HSG21 of the Unitary Development Plan (1998) requires hostel accommodation to have access to local facilities such as public transport, open space and local shops, and have adequate indoor and outdoor amenity space and rooms of an adequate size.

# Intensity of Use

8.3 The proposal is for the change of use of 220 square metres of floorspace at first and second floor level from ancillary public house accommodation (Use Class A4) to backpackers' hostel accommodation (Sui Generis), comprising 8no. dormitories with a total of 83no. beds. The proposed hostel would operate between the hours of 11:00 and 23:00 Monday to Saturday, and 12:00 to 22:30 on Sundays and Bank Holidays, although guests would be able to enter and exit the premises at any time, 24 hours a day. The hostel would also employ 5no. full-time and 5no. part-time staff. The proposed schedule of accommodation is as follows:

8.4	Dorm No.	Area in m2	No. of bunk beds	No. of guests	Area per guest
	1	14 m2	3 triple bunks	9	1.56 m2
	2	7 m2	1 double bunk	2	3.50 m2
	3	13 m2	3 triple bunks	9	1.44 m2
	4	26 m2	5 triple bunks	15	1.73 m2
	5	18 m2	4 triple bunks	12	1.50 m2
	6	15 m2	3 triple bunks	9	1.67 m2
	7	29 m2	5 triple bunks	15	1.93 m2
	8	18 m2	4 triple bunks	12	1.50 m2
	TOTAL	140 m2	1 double / 27 triple	83	1.69 m2 (average)

- 8.5 The applicant seeks to justify the high number of proposed beds by reference to the Capacity Calculations on drawing numbers '0055-SK(00)001 (Rev P0)' and "0055-SK(00)002 (Rev P0)' and the Visit Britain "Quality in Tourism Standards". These standards require a minimum of 4 square metres of floor space per bunk bed. While this is not a standard that has been adopted by the Council, in the absence of a development plan standard this is a useful reference point. The area is to be calculated on the basis of the maximum dimensions of the room divided by the number of bed bases in the room. Looking at the table set out above all dorm rooms fall below this recommended space requirement. While one dorm room is 0.5m² short the remaining dorms fall substantially below this standard and provide less than half the space required.
- 8.6 The provision of a total of 83 beds within 140 square metres of floorspace would result in an average provision of 1.69 square metres of floorspace per bed / guest. Furthermore, Dormitories 5 and 8 providing each guest with just 1.5 square metres of floorspace, whilst Dormitory 3 provides each guest with just 1.44 square metres of floorspace. As such, it is considered that the quality of the proposed hostel accommodation is unacceptable due to the high density of beds per square metre of floorspace.
- 8.7 A letter of representation has been received in which objection is raised to the proposed backpackers' hostel on the grounds that the proposal does not adequately demonstrate how the premises could be safely evacuated by 83 guests in the event of a fire (see the 'Local Representation' section of this report). LBTH Building Control have assessed the proposal and consider that "the plans for the hostel accommodation at the above do not show suitable means of escape for the number of occupants that are proposed. The stair layout is unsatisfactory and the reduction in the door width and final staircase is also not acceptable."

8.8 Taking into account the above, it is considered that the proposed 83 bed backpackers' hostel would result in the overdevelopment of the site, in turn resulting in the provision of substandard guest accommodation. The proposal therefore fails to meet the requirements of saved Policy HSG21 of the Unitary Development Plan (1998). This policy requires hotel accommodation to have adequate indoor and outdoor amenity space, have rooms of an adequate size and meet the requirements of all other relevant policies and planning standards.

## Location of Use

- 8.9 The proposed backpackers' hostel would be located in a predominantly residential area at the south-eastern corner of the Isle of Dogs. As such, there are limited facilities for visitors in the surrounding area, with only a local shopping parade along Manchester Road to the northwest of the site. Furthermore, whilst the site lies approximately 350 metres to the east of the Island Gardens Docklands Light Rail (DLR) Station, there are a limited number of bus routes available from Manchester Road and the site lies approximately 2 kilometres from the nearest London Underground Station at Canary Wharf. As such, the site and surrounding area has relatively poor public transport links, which result in the site having a low Public Transport Accessibility Level (PTAL) of 2.
- 8.10 Taking into account the above, the proposed backpackers' hostel would be located outside of a designated Town Centre in an area with limited local facilities and poor access to public transport, with site having a Public Transport Accessibility Level (PTAL) of 2. As such, the proposal is contrary to Policy SP06(4) of the Council's adopted Core Strategy (2010), Policy 4.5 of The London Plan (2011) and saved Policy HSG21 of the Unitary Development Plan (1998). These policies seek to ensure that visitor accommodation is located within appropriate Town Centre locations with good access to public transport.

# **Amenity**

- 8.11 Policy SP10(4) of the adopted Core Strategy (2010), saved Policy DEV2 of the Unitary Development Plan (1998) and Policy DEV1 of the Interim Planning Guidance (2007) require development to protect, and where possible improve, the amenity of surrounding existing and future residents and building occupants, as well as protect the amenity of the surrounding public realm. Saved Policy DEV50 of the Unitary Development Plan (1998) and Policy DEV10 of the Interim Planning Guidance (2007) require the level of noise generated from a development to be taken into account as a material planning consideration and require attenuation measures to be incorporated into development likely to generate unacceptable levels of noise.
- 8.12 The application site is located within a predominantly residential area, with a terrace of houses at 3-13 Glenaffric Avenue (odd) immediately to the west of the site, as well as further dwellings to the north and south-east of the site. It is noted that letters of representation have been received from local residents in which objection has been raised to the proposal on the grounds that the proposal would result in noise disturbance to neighbours, particularly at night.
- 8.13 Whilst the application form states that the hostel will only operate between the hours of 11:00 and 23:00 Monday to Saturday, and 12:00 to 22:30 on Sundays and Bank Holidays, it also states that guests would be able to enter and exit the premises at any time, 24 hours a day. In addition, drawing '0055-SK(00)003 (Rev P0)' shows that the coffee bar area, which comprises approximately 100 square metres of floorspace on the west side of the ground floor, would be staffed and open 24 hours a day to guests.
- 8.14 It should be noted that the upper floors of the building are currently being used as backpackers' hostel accommodation without the benefit of planning permission, which is

being investigated by the Enforcement Team (see the 'Planning History' section of this report). On 20<sup>th</sup> April 2011 Enforcement Officer Richard Carter attended site and observed that the upper floors of the building included a total of 60 beds. At the time of the site visit, Mr Carter was advised that rooms were being let out on a room-by-room basis, although he was advised that from 9<sup>th</sup> May 2011 the bunks in all rooms would be let out individually.

- 8.15 It should also be noted that letters of representation have been received in which objection has been raised in relation to a perceived increase in noise disturbance from the site since the hostel use has been operating. As such, given that the hostel use has been operating with a capacity of 60 beds, which is lower than the 83 beds sought under this application, and given the objections received from neighbours on grounds of noise disturbance from the existing unauthorised use, it is considered that an increase in capacity at the site to 83 beds would result in further deterioration to neighbouring residential amenity.
- 8.16 Given the quiet residential character of the surrounding area and the proximity of the site to neighbouring dwellinghouses, together with the proposed capacity of up to 83 guests and the ability for these guests to enter and exit the site and use facilities at ground floor level 24 hours a day, it is considered that the proposed hostel use would have an unacceptable impact on the amenity of neighbouring residents.
- 8.17 The proposal is therefore contrary to the requirements of Policy SP10(4) of the adopted Core Strategy (2010), saved Policies DEV2 and DEV50 of the Unitary Development Plan (1998) and Policies DEV1 and DEV10 of the Interim Planning Guidance (2007). These policies seek to ensure that development proposals do not result in undue noise disturbance and protect the amenity of surrounding existing and future residents and building occupants, as well as protect the amenity of the surrounding public realm.

# **Highways**

# Waste and Recyclables Storage

- 8.18 Policy SP05(1) of the Council's adopted Core Strategy (2010) seeks the implementation of the waste management hierarchy of reduce, reuse and recycle by requiring developments to appropriately design and plan for waste storage and recycling facilities. Policy 5.17(E) of The London Plan (2011) states that suitable waste and recycling storage facilities are required in all new developments. Policy DEV15 of the Interim Planning Guidance (2007) seeks to ensure that development includes adequate waste and recyclables storage facilities given the frequency of collection, which should be located within an internal room or an area within the development that is screened from the street in perpetuity.
- 8.19 A letter of representation has been received in which objection is raised on the ground that the proposed waste storage facilities would be inadequate for the proposed use. The proposed waste storage facilities at the site comprise two wheelie bins located on the footway on Saunders Ness Road, adjacent to the east elevation of the site. The proposal includes no information on the capacity of the proposed wheelie bins. It is noted that the application and supporting documentation states that the location of the bins on the footway has been agreed by the Council.
- 8.20 It should be noted that LBTH Transportation & Highways have raised objection to the proposed location of wheelie bins on the public highway (Saunders Ness Road), stating that an internal storage location must be found. Whilst it may be acceptable to position the bins on the footpath during collection hours, the proposed waste storage facilities should be located within the curtilage of the site at all other times. The submitted plans do not show a designated area within the curtilage of site for the storage of waste and recyclables.
- 8.21 Taking into account the above, it is considered that the proposed waste and recyclables storage facilities are contrary to the requirements of Policy DEV15 of the Interim Planning

Guidance (2007). These policies seek to ensure that development includes adequate waste and recyclables storage facilities given the frequency of collection, which should be located within an internal room or an area within the development that is screened from the street in perpetuity.

## Servicing

8.22 A letter of representation has been received in which objection is raised on the grounds that any increase in on-street servicing at the site will have an unacceptable impact on local residents. It is also noted that no information has been provided in relation to the proposed on-street servicing arrangements for the backpackers' hostel. However, given that the historic use of the site is as a Public House, which utilises on-street servicing by lorry, and given that there is adequate space for a lorry to park on the public highway outside of the site, it is not considered that a lack of information on the proposed servicing arrangements should constitute reason for refusal in this instance.

#### 9.0 CONCLUSIONS

9.1 All other relevant policies and considerations have been taken into account. Planning permission should be **refused** for the reasons set out in the SUMMARY OF MATERIAL PLANNING CONSIDERATIONS and the details of the decision are set out in the RECOMMENDATION at the beginning of this report.

