

<b>Committee:</b> Development	<b>Date:</b> 11 <sup>th</sup> April 2013	<b>Classification:</b> Unrestricted	<b>Agenda Item No:</b> 7.5
<b>Report of:</b> Corporate Director of Development and Renewal		<b>Title:</b> Planning Application for Decision	
<b>Case Officer:</b> Adam Williams		<b>Ref No:</b> PA/12/02045	
		<b>Ward(s):</b> Spitalfields and Banglatown	

## 1. APPLICATION DETAILS

**1.1 Location:** Site At 3-11 Goulston Street And 4-6 And 16-22 Middlesex Street, Middlesex Street, London E1

**Existing Use:** Vacant office and industrial building with the northern part of the site currently in use as a private car park at ground floor level.

**Proposal:** Demolition of the existing buildings and erection of a nine storey building to provide a 395 room hotel (Use Class C1), together with the creation of a new pedestrian route and other works incidental to the development.

**Drawing Nos / Documents:**

- IF 10-09-001 (Rev B);
  - IF 10-09-002 (Rev B);
  - IF 10-09-003 (Rev B);
  - IF 10-09/100 (Rev A);
  - IF 10-09/101 (Rev B);
  - IF 10-09/102 (Rev B);
  - IF 10-09/103 (Rev B);
  - IF 10-09/104 (Rev A);
  - IF 10-09/105 (Rev B);
  - IF 10-09/106;
  - IF 10-09-201;
  - IF 10-09-202;
  - IF 10-09-301 (Rev B);
  - IF 10-09-302 (Rev B);
  - IF 10-09-303 (Rev B);
  - IF 10-09-304 (Rev B);
  - IF 10-09-305 (Rev A);
  - IF 10-09-306 (Rev A);
  - IF 10-09-307 (Rev A);
  - IF 10-09-308 (Rev A);
  - IF 10-9-401;
  - IF 10-9-402;
  - IF 10-9-403;
  - Figure 6A – Vehicle Swept Path Analysis Assuming Access to/from North via Middlesex Street, dated March 2013;
  - Figure 6B – Vehicle Swept Path Analysis of 10m Rigid Vehicle, dated March 2013;
  - Design and Access Statement, prepared by if...architecture, dated June 2012;
  - Volume 1 – Planning Statement in Support of Proposed Development, dated June 2012;
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- Volume 2 – Energy Strategy and Renewable Energy Report (Edition 4), prepared by Foreman Roberts, dated 28 June 2012;
- Volume 2 – BREEAM Pre-Assessment Report (Edition 2), prepared by Foreman Roberts, dated 28 June 2012;
- Volume 3 – Daylight and Sunlight Report, prepared by GIA, dated 28 June 2012;
- Additional Daylight and Sunlight Assessment, dated 27 February 2013;
- Artisan House Window Map;
- Volume 4 – Noise Assessment, prepared by Environmental Planning & Assessment Limited, dated June 2012;
- Volume 5 – Site Waste Management Plan, prepared by Environmental Planning & Assessment Limited, dated June 2012;
- Volume 7 – Transport Statement (Issue A01), prepared by Waterman Transport & Development Limited, dated 28 June 2012
- Volume 8 – Air Quality Assessment, prepared by Environmental Planning Assessment Limited, dated June 2012;
- Historic Environment Assessment (Issue 1), prepared by Museum of London Archaeology, dated 4 July 2012;
- Middlesex Street – Response to Policy Observations, dated 16 October 2012;
- Letter from Adrian Bunnis of CBRE, dated 16 November 2012;
- 3D Visualisation Photomontage;
- Email from Rory McManus of DP9, dated 28 February 2013;
- Email from Rory McManus of DP9, dated 15 March 2013;
- Email from Rory McManus of DP9, dated 27 March 2013.

**Applicant:** Cromlech Property Company Limited

**Owners:** Cromlech Property Company Limited

**Historic Building:** N/A

**Conservation Area:** Wentworth Street

## **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 Local Development Framework Core Strategy (2010), London Borough of Tower Hamlets Unitary Development Plan (1998), the Managing Development Development Plan Document (Submission Version May 2012 with modifications), associated supplementary planning guidance, the London Plan (2011) and the National Planning Policy Framework (2012), and found that:
- 2.2 Sufficient evidence has been provided to justify the loss of employment floorspace in this instance, in accordance with the requirements of saved Policy EMP3 of the Unitary Development Plan (1998), Policy DM15(1) of the Managing Development DPD (Submission Version May 2012 with modifications) and Policy EE2 of the Interim Planning Guidance (2007). These policies seek to resist the loss of employment floorspace in the Borough unless it can be demonstrated that the floorspace in questions is unsuitable for continued employment use or is surplus to requirements.

- 2.3 The proposed hotel is an appropriate use within this location and accords with the requirements of Policy SP06 (4) of the Council's adopted Core Strategy (2010), Policy DM7 (1) of the Managing Development DPD (Submission Version May 2012 with modifications) and Policy 4.5 of the London Plan (2011). These policies seek to ensure that new hotel developments are appropriately located within the town centre hierarchy in areas with good access to public transport, with at least 10 per cent of rooms being wheelchair accessible, and not resulting in an overconcentration of hotel uses on the surrounding area, nor compromising the supply of land for new housing.
- 2.4 The proposed building incorporates good design principles and takes into account and respects the local character and setting of the development site and its surroundings in terms of scale, height, bulk, design details, materials and external finishes. The proposal therefore accords with the requirements of Policy SP10(4) of the Council's adopted Core Strategy (2010), saved Policy DEV1 of the Unitary Development Plan (1998) Policy DM24 of the Managing Development DPD (Submission Version May 2012 with modifications), Policy DEV2 of the Interim Planning Guidance (2007), and Policy 7.4 of the London Plan (2011).
- 2.5 The proposed building has been sensitively designed within the context of the historic built form and public realm and would preserve and enhance the setting of the Wentworth Street Conservation Area. The proposal therefore accords with Policy SP10(2) of the Council's adopted Core Strategy (2010), Policy DM27 of the Managing Development DPD (Submission Version May 2012 with modifications), Policy CON2 of the Interim Planning Guidance (2007), Policy 7.8 of the London Plan (2011) and government guidance set out in Section 12 of the National Planning Policy Framework (2012). These policies and government guidance seek to ensure that development proposals are sympathetic to their historic surroundings and preserve or enhance the character and appearance of the Borough's Conservation Areas.
- 2.6 The proposed hotel includes adequate means of accessible and inclusive access, in accordance with saved Policy DEV1 (4) of the Unitary Development Plan (1998), Policy DEV3 of the Interim Planning Guidance (2007) and Policy 7.2 of the London Plan (2011). These policies seek to ensure that development can be used safely, easily and with dignity by all persons regardless of disability, age, gender, ethnicity or economic circumstance.
- 2.7 Subject to condition, it is considered that the proposal would adequately protect both users of the development and neighbouring residents from undue noise disturbance. The proposal therefore accords with the requirements of Policy SP10(4) of the Council's adopted Core Strategy (2010), saved Policies DEV2 and DEV50 of the Unitary Development Plan (1998), Policy DM25 of the Managing Development DPD (Submission Version May 2012 with modifications) and Policy DEV1 of the Interim Planning Guidance (2007). These policies 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.
- 2.8 Subject to condition, it is considered that the proposed servicing arrangements for the hotel are satisfactory and would not significantly impact on the capacity or safety or the road network, which accords with the requirements of Policy SP09 (3) of the Council's adopted Core Strategy (2010), saved Policy T16 of the Unitary Development Plan (1998), Policy DM20 (2) of the Managing Development DPD (2012) and Policy DEV17 of the Interim Planning Guidance (2007).
- 2.9 Subject to condition, it is considered that the proposal includes adequate secure cycle parking facilities, in accordance with Policy DM22 (1) of the Managing Development DPD (Submission Version May 2012 with modifications), Policy DEV16 of the Interim Planning Guidance (2007) and Policy 6.9 of the London Plan (2011). These policies promote sustainable forms of transport and seek to ensure the developments include adequate provision of secure cycle parking facilities.

- 2.10 Subject to condition, it is considered that the proposal includes adequate facilities for the storage of waste refuse and recyclables, in accordance with Policy SP05 (1) of the Council's adopted Core Strategy (2010), saved Policy DEV55 of the Unitary Development Plan (1998), Policy DM14 of the Managing Development DPD (Submission Version May 2012 with modifications) and Policy DEV15 of the Interim Planning Guidance (2007). These policies require planning applications to be considered in light of the adequacy and ease of access to the development for waste collection and the adequacy of storage space for waste given the frequency of waste collections.
- 2.11 Subject to condition, it is considered that the proposed development would not adversely affect any buried archaeological remains, in accordance with Policy SP10(2) of the Council's adopted Core Strategy (2010), saved Policy DEV43 of the Unitary Development Plan (1998), Policy DM27 of the Managing Development DPD (Submission Version May 2012 with modifications), Policy CON4 of the Interim Planning Guidance (2007) and government guidance set out in Section 12 of the National Planning Policy Framework (2012).

### 3. RECOMMENDATION

- 3.1 That the Committee resolve to **GRANT** planning permission subject to:

The prior completion of a **legal agreement** to secure the following planning obligations:

- (a). A contribution of £56,825 towards Employment and Skills Training
  - (b). A contribution of £4,335 towards Idea Stores, Libraries and Archives
  - (c). A contribution of £13,867 towards Leisure Facilities
  - (d). A contribution of £27,613 towards Public Open Space
  - (e). A contribution of £51,660 towards the Public Realm
  - (f). A contribution of £3,085 towards Monitoring
  - (g). A commitment to 20% local employment during construction phase and end user phase and procurement during the construction phase in accordance with the Planning Obligations SPD.
  - (h). A commitment to providing 1 apprenticeship per £1 million total project cost during the construction phase, and for the hotel operator to attend a meeting with LBTH Employment & Enterprise prior to occupation, and for the hotel operator to provide Skillsmatch with information on all non-technical hotel vacancies 72 hours prior to general release.
- 3.2 That the Corporate Director Development & Renewal is delegated power to negotiate the legal agreement indicated above.
- 3.3 That the Corporate Director Development & Renewal is delegated power to impose conditions and informatives on the planning permission to secure the following matters:

#### Conditions

- 1. Time limit
- 2. Development to be carried out in accordance with the approved plans.
- 3. Details and samples of facing materials
- 4. Details of landscaping
- 5. Details of treatment of southern part of site
- 6. Development to be supplied by the CHP upon completion and prior to occupation
- 7. Development to accord with the submitted Energy Strategy and Renewable Energy Report
- 8. BREEAM Certificates demonstrating an 'Excellent' rating
- 9. Details of windows, doors and external lighting, to accord with SBD Design requirements
- 10. Details of glazing specification, to accord with BS 8233
- 11. Plant Noise Assessment, including current background noise survey
- 12. Servicing, Coach and Car Parking Management Plan

13. Updated Transport Statement
14. Details of disabled parking (2 spaces)
15. Details of cycle parking
16. Cycle parking facilities to be retained and maintained for the life of the development
17. Travel Plan
18. Hotel Waste Management Plan
19. Construction Environmental Management Plan
20. Details of the construction of the foul and surface drainage system
21. Details and method of piling and foundation design
22. Programme of archaeological mitigation
23. Land contamination scheme
24. Updated Air Quality Assessment
25. Any other condition(s) considered necessary by the Corporate Director Development & Renewal.

#### **Informatives**

1. This development is to be read in conjunction with the S106 agreement.
2. The developer is to enter into a S278 agreement for works to the public highway.
3. The developer is to contact the Council's Building Control service.
4. Installation of petrol / oil interceptors in areas to be used by vehicles
5. Installation of fat traps
6. Thames Water minimum water pressure informative
7. Contact London Underground Infrastructure Protection
8. Any other informative(s) considered necessary by the Corporate Director Development & Renewal.

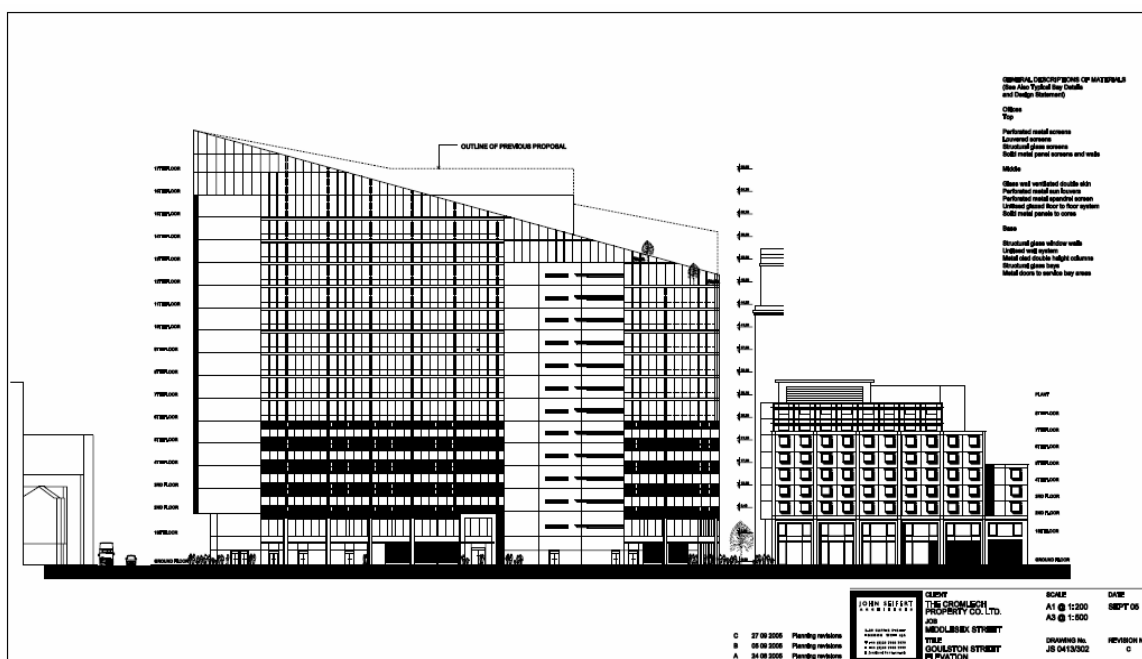
- 3.4 That, if within 3-months of the date of this committee the legal agreement has not been completed, the Corporate Director Development & Renewal is delegated power to refuse planning permission.

## **4. PROPOSAL AND LOCATION DETAILS**

### **Background**

- 4.1 The application site was subject to a previous planning permission, granted on 13 June 2008, for the redevelopment of the site to provide a mixed use development comprising a 17 storey office building (providing 41,361 square metres of B1 office floorspace), an 8 storey plus plant room hotel building (providing 207 guest rooms and 15,002 square metres of C1 hotel floorspace), together with retail uses (872 square metres of A1-A4 floorspace), with ancillary car parking, servicing, landscaping and new vehicular access.
- 4.2 The previously approved scheme comprised two separate blocks, with the smaller hotel block located at the northern end of the site, whilst the larger office block spanned the central and southern sections of the site (see Figure 1). Prior to expiry of the three year consent for this scheme, the Council received an application for a new planning permission in order to extend the time limit for implementation (reference PA/11/01463), which remains undetermined. The previous consent is therefore still relevant, until such a time as the application is either determined or withdrawn by the applicant, although there is no permission in place.

Figure 1: Previously Approved Scheme, reference PA/05/00471



## Proposal

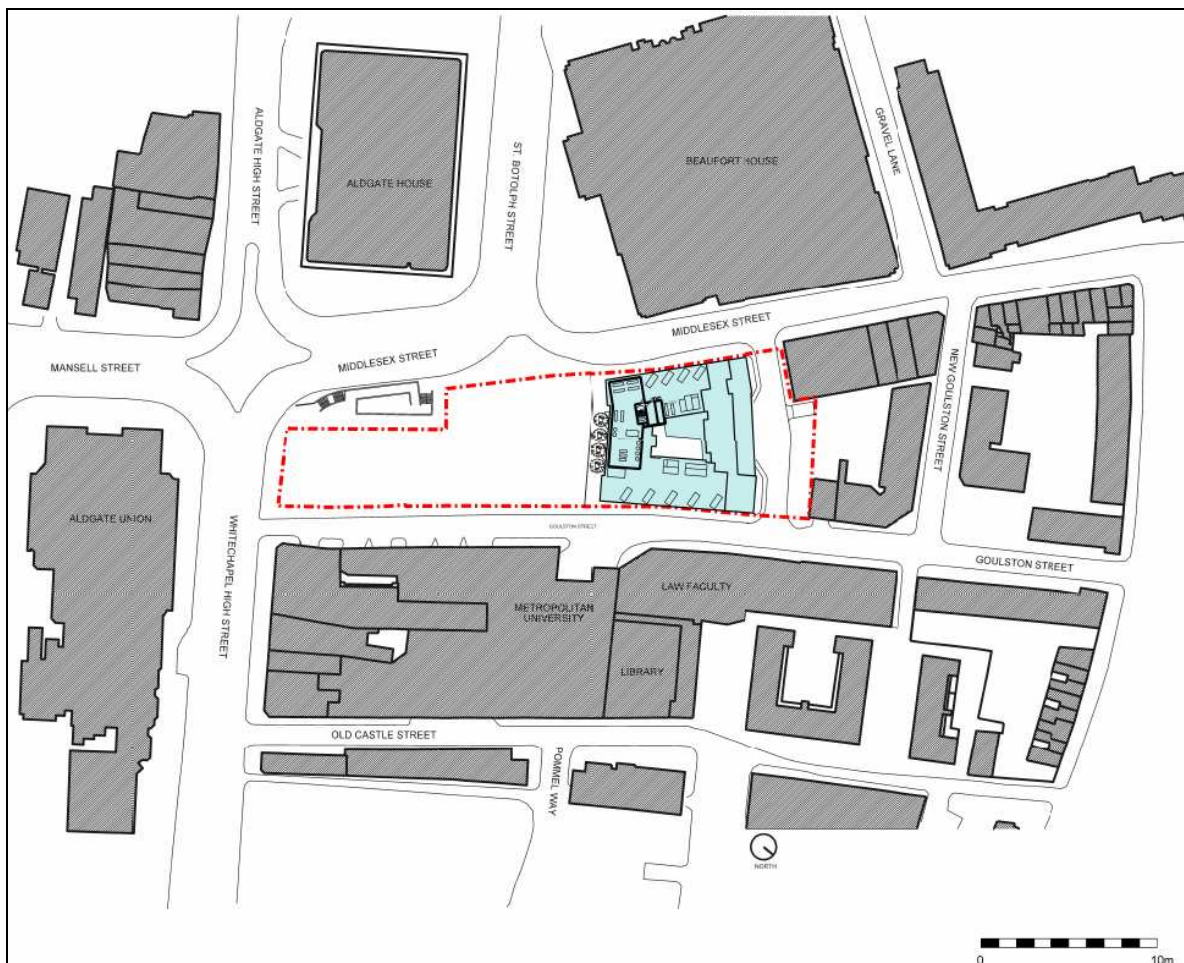
- 4.3 The current proposal is for the demolition of the existing vacant 1960s office and industrial building and erection of a new hotel building at the northern end of the site, which ranges from 6 to 9 storeys in height. The proposal also includes the introduction of a new east/west walkway through the middle of the site, providing a new pedestrian link between Goulston Street and Middlesex Street, which bound the east and west sides of the site respectively. The proposal would retain the existing private road located at the northern end of the site and includes the formation of a new service bay to enable off-street servicing and coach parking for the hotel.
- 4.4 The proposed hotel building is contemporary in its design and the lower floors are faced in reconstituted stone whilst the upper floors are faced in metal cladding panels. The façade of the building is punctuated by square set fenestration set in deep reveals and includes double-height glazed openings at ground floor level. The building design incorporates a number of active and passive energy efficiency measures, together with the use of a Combined Heat and Power (CHP) system and renewable energy generation systems in the form of a photovoltaic cell array located at roof level. With the exception of disabled parking, the proposed development would be 'car free' and includes provision of separate secure cycle parking facilities for guests and staff.
- 4.5 The hotel building proposed in the current application is comparable to that which was previously granted consent in 2008 under planning permission reference PA/05/00471. Specifically, the location, footprint, and mass of the hotel buildings are broadly similar and the formation of a new pedestrian walkway through the middle of the site and the use of the existing private road for servicing and coach parking are elements that feature in both schemes. However, whilst both buildings are eight storeys in height with additional plant rooms at roof level, the current proposals include a reduction in height from 32 metres to 27.5 metres by lowering the floor to ceiling heights throughout the building. In addition, the hotel bedrooms in current proposals are smaller than those in the previously consented

scheme, increasing the number of hotel bedrooms from 207 to 395.

### Site and Surroundings

- 4.6 The application site comprises a long, generally rectangular plot that is approximately 150 metres in length and 25 metres in width at its southern end, increasing to 50 metres in width at its northern end and covers an area of 0.506 hectares. The site can be broadly divided into thirds along its length, with the southern third of the site having previously been cleared, whilst the remaining two thirds of the site currently comprise a vacant office and industrial building that ranges from three to nine storeys in height. There is currently a private car park operating at the northern end of the site at ground floor level.
- 4.7 The site is bounded by the residential properties at Flats 1-18 Artisan House, 36 Middlesex Street, 13-21 Goulston Street (odd) and 1-10 New Goulston Street to the north, by the public highway at Goulston Street to the east, by the public highway at Whitechapel High Street to the south, and by the public highway at Middlesex Street to the west. Whitechapel High Street forms part of the Transport for London Road Network (TLRN), for which Transport for London are the relevant Highway Authority.
- 4.8 The site is located immediately adjacent to the borough boundary shared with the City of London, which runs up the centre of Middlesex Street along the western side of the site, whilst the south-west corner of the site is located adjacent to the Aldgate Gyratory. The site also lies to the south of the famous Petticoat Lane Market, which still takes place every day on Wentworth Street and the surrounding streets.

Figure 2: Site Location



- 4.9 The site and its surroundings include no Statutory Listed Buildings, although the north-west

corner of the site abuts the southernmost boundary of the Wentworth Street Conservation Area, which was designated in October 1989 and is defined on the west side by Middlesex Street, formerly known as Petticoat Lane and the site of the medieval market. The area's character as a mixed use residential and commercial area, and its association with the clothing industry, has endured for hundreds of years. The application site also lies within an Archaeological Priority Area, as designated in the Council's Managing Development DPD (Submission Version May 2012 with modifications).

- 4.10 The surrounding built form in Aldgate to the south and west of the site predominantly comprises large floorplate office buildings, whilst the application site is located immediately to the west of the London Metropolitan University campus at Calcutta House. The scale of buildings generally recedes to the north of east of the site, with the surrounding streets including buildings dating from the Victorian period and early 20<sup>th</sup> century that range from two to five storeys in height, together with more contemporary buildings of a comparable scale.
- 4.11 The application site is located within the Central Activities Zone (CAZ) as designated by the London Plan (2011), within the City Fringe Activity Area, as designated by the Council's adopted Core Strategy (2010) and Managing Development DPD (Submission Version May 2012 with modifications). The site is also located within the Aldgate Masterplan boundary and the City Fringe boundary as designated by the Interim Planning Guidance (2007).
- 4.12 The site lies outside of the Council's Aldgate Preferred Office Location (POL), as set out in the Managing Development DPD (Submission Version May 2012 with modifications), which is located immediately to the south of the application site, including land and buildings to the south of Whitechapel High Street. The surrounding area is mixed use in character, predominantly comprising commercial uses, whilst Whitechapel Road includes a range of retail type uses along the street frontages
- 4.13 The application site benefits from excellent access to public transport, being located a short distance from both Aldgate and Aldgate East Underground Stations, whilst Whitechapel Road to the south and east of the site is served by a number of bus routes. As a result the site has a Public Transport Accessibility Level (PTAL) of 6b, which is the highest possible rating for public transport accessibility on a scale of 1 to 6b.

### **Relevant Planning History**

- 4.14 PA/05/00364  
On 7 April 2005 the Council issued a **Scoping Opinion** on the information to be contained in an Environmental Impact Assessment to be submitted in respect of redevelopment to provide a mixed use commercial scheme including a 20 storey office building and a 272 room hotel.
- 4.15 PA/05/00471  
On 13 June 2008 planning permission was **granted** for the redevelopment to provide a mixed use development comprising a 17 storey office building rising to a maximum height of 76m (and providing 41,361sq.m office floorspace), 8 storey hotel plus plant room building (providing 207 guest rooms, and comprising 15,002sq.m floor space), together with 872sq.m of Class A1-A4 use (retail) floorspace, and ancillary car parking, servicing, landscaping and new vehicular access.
- 4.16 PA/10/00033  
On 3 March 2012 advertisement consent was **refused** for the installation of a total of six advertisement panels comprising four freestanding internally illuminated hoarding panels on the south and western part of the site including two wall mounted advertisement panels attached to west elevation of building at lower level plus associated background screens. The Council's decision was subject to an appeal, which was subsequently **dismissed** by the Planning Inspectorate.



#### 4.17 PA/10/00034

On 3 March 2012 advertisement consent was **refused** for the installation of two banner advertisements panels attached to south and west elevations of existing building at upper levels measuring approximately 20 metres (height) x 32.4 metres (width) and 20 metres (height) x 12.32 metres (width). The Council's decision was subject to an appeal, which was subsequently **dismissed** by the Planning Inspectorate.

#### 4.18 PA/10/02072

On 15 October 2012 the Council **granted** consent under Section 96A of the Town and Country Planning Act for a non-material amendment to planning permission PA/05/00471 dated 13/06/08: [Redevelopment to provide a mixed use development comprising a 17 storey office building rising to a maximum height of 76m (and providing 41,361sq.m office floorspace), 8 storey hotel plus plant room; building (providing 207 guest rooms, and comprising 15,002sq.m floorspace), together with 872m<sup>2</sup> of Class a1-a4 use (retail) floorspace, and ancillary car parking, servicing, landscaping and new vehicular access].

Amendments:

Non-Material Amendment to add two new planning conditions to Planning Permission PA/05/00471:

1. A condition to allow for a phased development between the office and hotel component; and
2. A condition detailing approved plan numbers.

#### 4.19 PA/10/02109

On 15 December 2012 an application for variation of conditions under section 73 of the Town and Country Planning Act 1990 (as amended) was **withdrawn** by the applicant, for variation of Conditions 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 15, 17, 18, 19 and 20 of planning permission PA/05/471 dated 13/06/08: [Redevelopment to provide a mixed use development comprising a 17 storey office building rising to a maximum height of 76m (and providing 41,361m<sup>2</sup> office floorspace), 8 storey hotel plus plant room; building (providing 207 guest rooms, and comprising 15,002m<sup>2</sup> floorspace), together with 872m<sup>2</sup> of Class a1-a4 use (retail) floorspace, and ancillary car parking, servicing, landscaping and new vehicular access], to allow for a phased development between office and hotel component of the proposed redevelopment of the site.

#### 4.20 PA/11/01463

An application was received in June 2011 but remains **undetermined** for a new planning permission to replace extant planning permission dated 13th June 2008, reference PA/05/00471 for redevelopment to provide a mixed use development comprising a 17 storey office building rising to a maximum height of 76m (and providing 41,361m<sup>2</sup> office floorspace), 8 storey hotel plus plant room; building (providing 207 guest rooms, and comprising 15,002m<sup>2</sup> floorspace), together with 872m<sup>2</sup> of Class a1-a4 use (retail) floorspace, and ancillary car parking, servicing, landscaping and new vehicular access. This application is accompanied by an updated Environmental Impact Assessment under the provisions of the Town & Country Planning (Environmental Impact Statement) Regulations 1999.

**Officer Comments:** *Whilst the three year time limit for planning permission PA/05/00471 has low lapsed, given that application PA/11/01463 was submitted prior to the expiry of the original consent and remains undetermined, the original consent therefore remains relevant until such a time as the application is either determined or withdrawn by the applicant.*

## 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 Government Planning Policy Guidance/Statements**

National Policy Planning Framework (2012)

**5.3 Spatial Development Strategy for Greater London (London Plan) 2011**

Proposals: Central Activities Zone

Policies:	Policy No.	Title
	2.10	Central Activities Zone (Strategic Priorities)
	2.11	Central Activities Zone (Strategic Functions)
	4.2	Offices
	4.5	London’s Visitor Infrastructure
	5.1	Climate Change Mitigation
	5.2	Minimising Carbon Dioxide Emissions
	5.3	Sustainable Design and Construction
	5.5	Decentralised Energy Networks
	5.6	Decentralised Energy in Development Proposals
	5.7	Renewable Energy
	5.8	Innovative Energy Technologies
	5.9	Overheating and Cooling
	5.13	Sustainable Drainage
	5.15	Water Use and Supplies
	5.17	Waste Capacity
	5.21	Contaminated Land
	6.3	Assessing Effects of Development on Transport Capacity
	6.8	Coaches
	6.9	Cycling
	6.10	Walking
	6.12	Road Network Capacity
	6.13	Parking
	7.1	Building London’s Neighbourhoods and Communities
	7.2	An Inclusive Environment
	7.3	Designing out Crime
	7.4	Local Character
	7.5	Public Realm
	7.6	Architecture
	7.8	Heritage Assets and Archaeology
	7.9	Heritage-led Regeneration
	7.13	Safety, Security and Resilience to Emergency
	7.14	Improving Air Quality
	7.15	Reducing Noise and Enhancing Soundscapes
	8.2	Planning Obligations

**5.4 Core Strategy Development Plan Document 2025 (adopted September 2010)**

Spatial Policies:	Policy No.	Title
	SP01	Refocusing on our Town Centres
	SP03	Creating Healthy and Liveable Neighbourhoods
	SP04	Creating a Green and Blue Grid
	SP05	Dealing with Waste
	SP06	Delivering Successful Employment Hubs
	SP09	Creating Attractive and Safe Streets and Spaces
	SP10	Creating Distinct and Durable Places
	SP11	Working Towards a Zero-carbon Borough
	SP13	Delivering and Implementation

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

Proposals: Site 8 – Mixed Use Development (Schedule 2)  
Area of Archaeological Importance or Potential

Policies:	Policy No.	Title
	DEV1	Design Requirements
	DEV2	Environmental Requirements
	DEV4	Planning Obligations
	DEV43	Protection of Archaeological Heritage
	DEV44	Preservation of Archaeological Remains
	DEV50	Noise
	DEV51	Contaminated Land
	DEV55	Waste from New Development
	DEV56	Waste Recycling
	EMP1	Promoting Employment Growth
	EMP3	Change of Use of Redevelopment of Office Floorspace
	EMP8	Encouraging Small Business Growth
	T7	The Road Hierarchy
	T10	Strategic Traffic Management
	T16	Transport and Development
	T18	Pedestrians

### 5.6 Managing Development Development Plan Document (Submission Version May 2012) with modifications(MD DPD)

Development Management Policies:	Policy No.	Title
	DM1	Development Within the Town Centre Hierarchy
	DM7	Short Stay Accommodation
	DM13	Sustainable Drainage
	DM14	Managing Waste
	DM15	Local Job Creation and Investment
	DM16	Office Locations
	DM20	Supporting a Sustainable Transport Network
	DM21	Sustainable Transportation of Freight
	DM22	Parking
	DM23	Streets and Public Realm
	DM24	Place-sensitive Design
	DM25	Amenity
	DM27	Heritage and the Historic Environment
	DM29	Achieving a Zero-carbon Borough and Addressing Climate Change
	DM30	Contaminated Land

### 5.7 Interim Planning Guidance for the purposes of Development Control 2007 (IPG)

Policies	Policy No.	Title
	IMP1	Planning Obligations
	DEV1	Amenity
	DEV2	Character and Design
	DEV3	Accessibility and Inclusive Design
	DEV4	Safety and Security
	DEV5	Sustainable Design
	DEV6	Energy Efficiency and Renewable Energy
	DEV8	Sustainable Drainage
	DEV9	Sustainable Construction Materials
	DEV10	Disturbance from Noise Pollution

DEV11	Air Pollution and Air Quality
DEV12	Management of Demolition and Construction
DEV15	Waste and Recyclables Storage
DEV16	Walking and Cycling Routes and Facilities
DEV17	Transport Assessments
DEV18	Travel Plans
DEV19	Parking for Motor Vehicles
DEV20	Capacity of Utility Infrastructure
DEV22	Contaminated Land
EE2	Redevelopment/Change of Use of Employment Sites
CON2	Conservation Areas
CON4	Archaeology and Ancient Monuments

## 5.8 Supplementary Planning Guidance/ Other Relevant Documents

### **LBTH**

LBTH Planning Obligations Supplementary Planning Document (2012)

LBTH Aldgate Masterplan (2007)

LBTH Wentworth Street Conservation Area Character Appraisal and Management Guidelines (2007)

LBTH Designing Out Crime Supplementary Planning Guidance (2002)

LBTH Air Quality Action Plan (2003)

LBTH Clear Zone Plan 2010-2025 (2010)

### **Mayor of London**

Use of Planning Obligations in the Funding of Crossrail Supplementary Planning Guidance (2010)

Accessible Hotels in London (2010)

## 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.

The following were consulted regarding the application:

### **LBTH Cleansing Officer**

- 6.2 Based on our guidelines, the waste storage area is only sufficient if the collection takes place every day. So the planning permission can be granted on a condition that they set up a contract with the private waste management company with the appropriate frequency of collection. Frequency of collection recommended by the council is 7 times a week (every day). If the frequency of collection can't be met then more space needs to be separated to allow extra bin to fit in.

**Officer Comments:** If planning permission were to be granted it is recommended that a condition be included to require the submission for approval of a Hotel Waste Management Plan, to include details of the specific refuse and recyclables storage capacity at the site, together with confirmation that a contract has been entered into with a private waste management company and details of the frequency of collection. In the event that refuse cannot be collected on each day of the week, the Hotel Waste Management Plan must provide details of increased refuse storage capacity in order to meet the refuse storage requirements for the site given the anticipated frequency of collection.

### **LBTH Environmental Health (Noise & Vibration)**

- 6.3 The proposed plant noise/glazing specification conditions are acceptable. A Plant Noise Assessment with current background noise survey should be secured by condition.

**Officer Comments:** *If planning permission were to be granted it is recommended that a detailed Plant Noise Assessment is secured by condition.*

### **LBTH Environmental Health (Contaminated Land)**

- 6.4 No objections subject to the inclusion of a condition to ensure the developer carries out a site investigation to investigate and identify potential contamination.

***Officer Comments:** If planning permission were to be granted it is recommended that a condition be included to secure a scheme to identify the extent of the contamination and the measures to be taken to avoid risk to the public, buildings and environment when the site is developed.*

### **LBTH Environmental Health (Air Quality)**

- 6.5 There are some inconsistencies in the submitted Air Quality Assessment. If planning permission is granted, a condition should be included to require the submission of an updated Air Quality Assessment, to include modelling using current data, together with the input data for the proposed plant.

***Officer Comments:** If planning permission were to be granted, it is recommended that an updated Air Quality Assessment be secured by condition.*

### **LBTH Transportation & Highways**

- 6.6 The proposals are acceptable in Highways terms, subject to the following conditions:

- Submission of a revised Transport Statement incorporating the gyratory changes and their impacts - when the Gyratory final plans have been released. This revised Transport Statement should include details and plan(s) of the gyratory system, so that the latter scheme's impacts can be related to this development.
- Submission of a plan showing the location of a second on-site disabled space, with autotracks for both disabled spaces and vehicles using the bay opposite. The applicant is asked to place the second space either parallel or at right angles to the first bay (there may be a small loss of refuge space at the short end of the parallel space). This is because Highways requires a staff and a hotel guest space.
- Submission of detailed plans and specifications for both the guest and staff secure cycle parking facilities.
- Compliance condition for the on-site cycle storage spaces, disabled spaces and coach/loading spaces should be retained and maintained for their named purposes only. This is to ensure that these facilities remain for the life of the development.
- Submission of a Servicing, Coach and Car Parking Management Plan.
- Submission for Travel Plan

In addition to the above, a S278 informative should also be included to cover the removal of the redundant crossover on Goulston Street, together with improvements to the footway, the lay-by (if progressed) and other usual technical matters.

***Officer Comments:** It is recommended that the above conditions and informative be included if planning permission were to be granted.*

### **LBTH Senior Arboricultural Trees Officer**

- 6.7 No comments have been received.

### **LBTH Ecology Officer**

- 6.8 No comments have been received.

### **LBTH Enterprise & Employment**

- 6.9 Proposed employment/enterprise contributions at construction phase:

The developer should exercise best endeavours to ensure that 20% of the construction phase workforce will be local residents of Tower Hamlets. We will support the developer in

achieving this target through providing suitable candidates through the Skillsmatch Construction Services. To ensure local businesses benefit from this development we expect that 20% goods/services procured during the construction phase should be achieved by businesses in Tower Hamlets. We will support the developer to achieve their target through ensuring they work closely with the council to access businesses on the approved list, and via the East London Business Place.

The Council will seek to secure a financial contribution of £28,619 to support and/or provide the training and skills needs of local residents in accessing the job opportunities created through the construction phase of all new development.

Proposed employment/enterprise contributions at end-use phase:

The council seeks a monetary contribution of £28,441 towards the training and development of unemployed residents in Tower Hamlets to access either:

- i) jobs within the hotel development in the end-phase
- ii) jobs or training within employment sectors relating to the final development

It is important that local employment is maximised through the end-user phase as the development will result in a loss of employment floor space (-4604sqm). In addition, there should be a commitment to the developer to providing apprenticeships during the construction phase, an introduction with the hotel operator prior to occupation, and to provide Skillsmatch with information on all non-technical hotel vacancies 72 hours prior to general release.

**Officer Comments:** *The above financial and non-financial contributions have been agreed with the applicant and will be secured through the S106.*

#### **LBTH Markets Team**

- 6.10 Middlesex Street is designated as a Market on Sunday only for its entire length between the hours of 9 am and 2 pm. The traders are usually clear by 5 pm and the area is then cleaned by Veolia. There is a road closure in place for this road so there will be no access for vehicles on Sundays during or after the development completion.

Goulston Street is designated as a market for its entire length Monday to Sunday. Monday to Friday the area is designated between the hours of 8 am and 4 pm.

On Sunday the market is designated the same as Middlesex Street.

Vehicular access for off-street servicing, coach parking and disabled parking for the hotel will only be available Monday to Saturday due to the road closures for the street market on Sundays and there may be vehicle access safety problems Monday to Friday due to the one way system in the area.

The Markets Team raise no objections subject to the inclusion of conditions to secure a Waste Management Plan, Servicing, Coach and Car Parking Plan and Construction Environmental Management Plan, to demonstrate that the development will not adversely impact on the market operation.

**Officer Comments:** *It is noted that road closures are in place on Sundays on both Middlesex Street and Goulston Street during the market trading period (9:00 to 14:00 hours) which would prevent servicing vehicles, coaches or cars accessing the service road at the northern end of the site, which can only be accessed (by vehicles) from Middlesex Street. It is further noted that the market set up period on Sunday morning and clear down period and subsequent street cleaning in the afternoon would further restrict vehicle movements on these streets outside of the road closure period. As such, servicing, coach parking and disabled parking for the hotel would not be available for an extended period during the day*

on Sundays.

*In addition, it is noted that Goulston Street is designated as a street market for its entire length from Monday to Saturday from 8:00 to 16:00 hours, although these are no road closures in place on these days. Market stalls are able to operate on designated pitches on the carriageway on Goulston Street, which are similar to on-street parking bays in terms of their size and location. It is noted that street market activity on Goulston Street during weekdays is predominantly located to the north of the site.*

*Two swept path analysis drawings have been submitted ('Figure 6A' and 'Figure 6B') which show that both a 10 metre long servicing vehicle and 12 metre long coach would be able to exit the service road onto Goulston Street and manoeuvre between the market stall and car parking bays on either side of the street. These drawings have been reviewed by LBTH Transportation & Highways and are considered to be acceptable in demonstrating that there is sufficient room for servicing vehicles and coaches to manoeuvre on Goulston Street when the on-street market bays and parking bays are occupied.*

*Whilst it is noted that the operation of the market and road closures on Sundays would prevent servicing, coach and car parking access during the morning and early afternoon, it is noted that servicing and parking would become available later in the afternoon after the clear down period and street cleaning had been completed. It is also noted that the LBTH Markets Team raise no objections to the proposal, subject to the inclusion of conditions to secure a Waste Management Plan, Servicing, Coach and Car Parking Plan and Construction Environmental Management Plan, to demonstrate that the development will not adversely impact on the market operation. It is therefore recommended that such conditions be included in planning permission were to be granted.*

#### **LBTH Communities, Localities & Culture (Strategy)**

- 6.11 The following financial contributions are required to mitigate the impacts of the development in accordance with the Council's Planning Obligations Supplementary Planning Document (2012): £4,335 is required towards Idea Stores, Libraries and Archives; £13,867 is required towards Leisure Facilities; £27,613 is required towards Public Open Space, and; £51,660 is required towards public realm improvements.

**Officer Comments:** *The applicant has agreed to provide the full required S106 contributions for the scheme.*

#### **City of London Corporation**

##### 6.12 Planning Department

The proposal will not have a detrimental impact on the City of London.

##### Transportation and Projects Division

Concerns are raised regarding the potential conflicts that could arise between the City of London public realm improvement works and the proposed development. In addition, queries are raised as to whether consideration has been given to the impact of longer international coaches accessing the site, whether the new pedestrian route is appropriate in terms of desire lines, and the possible impacts that the market will have on the development.

**Officer Comments:** *The above matters are addressed in Section 8 of this report.*

#### **Transport for London**

- 6.13 The provision of disabled parking is supported, although query whether 1 space is adequate.

The proposal fails to provide adequate coach parking to meet the requirements of London Plan Policy 6.13 (1 space per 50 rooms), although given the location of the site, and the type of hotel proposed, it is accepted that such amount is excessive. Clarification is therefore sought on how coach parking will be managed. The applicant should submit a full Travel

Plan for TfL's consideration.

TfL is satisfied that the proposed servicing arrangements will not impact on the TLRN. These arrangements should nevertheless be reflected in a Delivery and Service Plan (DSP) which, along with a Construction Logistics Plan (CLP), should be secured and enforced by planning condition.

**Officer Comments:** *If planning permission were to be granted, it is recommended that conditions be included to require details of 2 disabled car parking spaces, together with a Servicing, Coach and Car Parking Management Plan, and a Construction Environmental Management Plan. This is discussed further in Section 8 of this report.*

### **English Heritage**

6.14 No comments have been received.

### **English Heritage Archaeology**

6.15 The site lies within an Archaeological Priority Area as designated by the London Borough of Tower Hamlets. It lies just outside the City walls in an area used for human burials in the Roman period, which may be anticipated on the site depending on the degree of later truncation. The southern portion of the site was subject to an archaeological evaluation in 1999, when remains of a medieval chalk cellar were encountered. Of particular interest is the Boar's Head Inn that was converted into a Playhouse in the late 16th century, which is thought to be situated in the southern area. The evaluation did not identify any remains associated with the theatre within the trenches, but there is a possibility of contemporary features within the wider area. The proposed development may, therefore, affect remains of archaeological importance.

The archaeological position should be reserved by attaching a condition to any consent granted under this application to secure the provision of archaeological investigation and the subsequent recording of the remains prior to development.

**Officer Comments:** *It is recommended that the above recommended archaeological condition be included if planning permission were to be granted.*

### **Thames Water Authority**

6.16 No objections, subject to the inclusion of conditions to secure a Piling Method Statement in order to ensure that the development does not adversely impact on local underground sewerage utility infrastructure.

Thames Water would recommend that petrol/oil interceptors be fitted in all car area used by vehicles, and also recommend the installation of a properly maintained fat trap on all catering establishments.

It is also recommended that an informative be included to advise the applicant to take into account Thames Water's minimum water pressure requirements in the design of the development.

**Officer Comments:** *If planning permission were to be granted, it is recommended that a condition be included to secure details and method of piling and foundation design. Officers also advise that the above recommendations regarding petrol/oil interceptors, fat traps and minimum water pressure requirements be included by way of informative.*

### **London Fire and Emergency Planning Authority**

6.17 No objections.

### **Environment Agency**



- 6.18 No objections, subject to the inclusion of conditions to secure the submission for approval of a statement of the method of working for the demolition and construction phases, details of the construction of the foul and surface drainage system, and details of piling and foundation design.

**Officer Comments:** *It is recommended that the above conditions be included if planning permission were to be granted.*

#### **Crossrail**

- 6.19 No comments have been received.

#### **EDF Energy Networks**

- 6.20 No comments have been received.

#### **Natural England**

- 6.21 No objections.

#### **National Grid**

- 6.22 No comments have been received.

#### **London Underground**

- 6.23 No objections subject to the inclusion of a condition to secure the detailed design and method statements (in consultation with London Underground) for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent).

The applicant should also be advised by way of informative to contact London Underground Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; excavation; construction methods; security; boundary treatment; safety barriers; landscaping and lighting.

**Officer Comments:** *If planning permission were to be granted, it is recommended that the above condition and informative be included.*

#### **London Bus Services**

- 6.24 No comments have been received.

#### **20th Century Society**

- 6.25 No comments have been received.

## **7. LOCAL REPRESENTATION**

- 7.1 A total of 568 planning notification letters were sent to nearby properties as detailed on the attached site plan, of which 370 properties are located within the Borough, whilst 198 properties are located within the City of London. 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:	2	Objecting:	1	Supporting:	1
No of petitions received:	0	objecting containing	0	signatories	
		0 supporting containing	0	signatories	

- 7.3 The following issues were raised in objection to the scheme.

- (a) The site abuts a Conservation Area with small scale Victorian buildings of independent shops below and elegant elevations above. The proposed building does not continue this tradition.
- (b) The area is predominantly residential with small retail units. The proposed building does not continue this tradition.
- (c) The proposed building is blank and uninteresting, similar to the Travel Lodge building in Harrow Place.
- (d) Buildings which have blank, solid or plate glass walls at ground level are pedestrian unfriendly. Buildings which have shops, cafes etc at ground level are pedestrian friendly and feel safer to walk in. This building would be unfriendly at ground level.
- (e) The view down Middlesex Street towards this rather cheap, tacky looking, oversized building is not in keeping with this part of the Street
- (f) Flats with shops below would be more appropriate

7.4 The following points were made in support to the scheme.

- (g) The proposed development will be a welcome improvement to a site that is currently subject to blight and will improve the overall amenity of the area. I also support the demolition of the whole site now, even prior to planning approval of the southern element.

**Officer Comments:** *The above points relate to the land use and design of the scheme, which are discussed in detail in Section 8 of this report.*

## 8. MATERIAL PLANNING CONSIDERATIONS

- 8.1 The main planning issues raised by the application that the Committee must consider are:
- (a). Land Use
  - (b). Design
  - (c). Amenity
  - (d). Highways

### Land Use

#### Loss of Use Class B1 Employment Floorspace

- 8.2 Government guidance set out at paragraph 22 of the National Planning Policy Framework (2012) states where there is no reasonable prospect of a site being used for an allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. Policy 4.2(A) of the London Plan (2011) encourages the renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility.
- 8.3 The application site is not located within a Preferred Office Location (POL) or Local Office Location (LOL), as designated in the Council's adopted Core Strategy (2010) and defined in the Managing Development DPD (Submission Version May 2012 with modifications). Policy DM15 of the Managing Development DPD (Submission Version May 2012 with modifications) seeks to resist the loss of active and viable employment uses on sites located outside of the POL and LOL, unless it can be shown that the site has been actively marketed

(for approximately 12 months) and that the site is unsuitable for continued employment use due to its location, accessibility, size and condition. This policy is further supported by Policy EMP3 of the Unitary Development Plan (1998) and Policy EE2 of the Interim Planning Guidance (2007), which seek to resist the loss of employment floorspace unless it can be demonstrated that it is no longer viable for continued employment use.

- 8.4 Approximately two thirds of the application site by area is taken up by Cromlech House, which is a purpose built office and industrial building that was erected in the late 1960s and ranges from three to nine storeys in height and comprises 15,500 square metres of office floorspace. With the exception of the northern part of the ground floor of the site, which is presently in use as a private car park, the building is currently vacant.
- 8.5 The proposal would result in the loss of 15,500 square metres of existing Use Class B1 office floorspace at the site, which the Council will normally seek to resist unless it can be shown that the floorspace in question is unsuitable for continued employment use due to its location, accessibility, size and condition, or that it has been marketed for office use at prevailing values for a prolonged period, or that there is a surplus of office floor space or unimplemented planning permissions for offices in the surrounding area. It is noted that the application site is not located within a designated Preferred Office Location or Local Office Location.
- 8.6 The application is accompanied by a report prepared by Adrian Bunnis of CBRE, dated 16 November 2012, which includes information on the current condition of the building and its subsequent unsuitability for refurbishment. The CBRE report states that the office accommodation at the site was constructed in the 1960s and dated in terms of its design and specification, with the floors being split into cellular office units with linoleum floor tiles, wall mounted perimeter heating and trunking, and suspended ceilings with a floor to ceiling height of 2.76 metres and floor to underside of ceiling height of 2.89 metres.
- 8.7 The report states that the building is in a dilapidated condition and has been vacant for 21 years. In addition, the floor and ceiling tiles have been identified as containing significant levels of asbestos and an investigation into this issue has been carried out and concluded that the cost of removing the contaminated materials would be approximately £365,000. Furthermore, the report states that the building's services are no longer functioning and would require complete replacement as they are beyond repair.
- 8.8 As such, the report concludes that the dilapidated condition and design limitations of the existing building, with particular regard to the limited floor to ceiling heights and industrial accommodation at first floor level, the floor plate of which renders it unsuitable for subdivision, together with the significant expenditure that would be required to refurbish the building coupled with the comparatively low financial returns through future office use, would exclude any refurbishment opportunity of the current building.

Figure 3: Photograph of Existing Building (South Elevation)



- 8.9 The report also includes an analysis of recent office supply and demand levels within Tower Hamlets, with particular regard to sites within the E1 postcode, within which the site is located. The report states that office take-up in E1 has been below trend for a number of years, which is largely due to a marked drop in demand from occupiers from banking and finance and technology, media, telecommunications (TMT) businesses, due to the credit crunch, tighter regulation and the on-going sovereign debt crisis in the Eurozone.
- 8.10 It is noted that the requirements of Policy DM15 of the Managing Development DPD (Submission Version May 2012 with modifications) include the submission of evidence that to demonstrate that vacant office floorspace has been marketed for office use at prevailing values for a prolonged period, which has not been provided in this instance. However, given the significant length of time that the building has been vacant together with its current dilapidated and contaminated state, Officers acknowledge that building is not suitable for future office use and as such the requirement for evidence of a recent marketing exercise in this instance would be both unduly onerous and contrary to government guidance set out at paragraph 22 of the NPPF (2012), which seeks to avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. As such, it is considered that the report is acceptable in terms of providing adequate justification for the loss of employment floorspace in this instance, in accordance with the Council's adopted and emerging policy requirements.
- 8.11 Taking into account the above, it is considered that sufficient evidence has been provided to justify the loss of employment floorspace in this instance, in accordance with the requirements of saved Policy EMP3 of the Unitary Development Plan (1998), Policy DM15 (1) of the Managing Development DPD (Submission Version May 2012 with modifications) and Policy EE2 of the Interim Planning Guidance (2007). These policies seek to resist the loss of employment floorspace in the Borough unless it can be demonstrated that the floorspace in questions is unsuitable for continued employment use or is surplus to requirements.

### Proposed Use Class C1 Hotel Use

- 8.12 The proposal is for the demolition of the existing office and industrial building and erection of a new nine storey building to provide 10,896 square metres of Use Class C1 hotel floorspace. The proposed hotel comprises a total of 395 guest rooms located at ground to seventh floor level together with ancillary hotel facilities, including a bar/café located at ground floor level.
- 8.13 The proposed hotel building would occupy the northern half of the site and the proposal includes the introduction of a new east/west pedestrian walkway through the site, located adjacent to the south elevation of the hotel building which will provide a new pedestrian route between Goulston Street to the east of the site and Middlesex Street to the west of the site. In addition, the proposal would retain the existing private road located at the northern end of the site, which is to be used for off-street servicing, coach parking and disabled parking.
- 8.14 Policy 4.5 of the London Plan (2011) and Policy SP06(4) of the Council's adopted Core Strategy (2010) seek to ensure that new hotel developments are sited in appropriate locations within the Borough, including the CAZ and City Fringe Activity Area, and benefit from good access to public transport. In addition, no less than 10 per cent of bedrooms are required to be wheelchair accessible. Policy 4.5 of the London Plan (2011) also includes Mayor's target for the delivery of new hotel accommodation within London, which is set at 40,000 net additional hotel bedrooms by 2031.
- 8.15 Policy DM7(1) of the Council's Managing Development DPD (Submission Version May 2012 with modifications) provides further detailed policy guidance for hotel developments, requiring hotels to be appropriate in size relative to their location, to serve a need for such accommodation, not to compromise the supply of land for new homes, not to create an over-concentration of hotels in a given area or harm residential amenity, and to benefit from adequate access for servicing, coach parking and vehicle setting down and picking up movements.
- 8.16 The application site, as part of the larger site benefiting from the extant planning permission identified above, is designated for 'mixed use development' in Schedule 2 of the Unitary Development Plan (1998). The application site lies within the CAZ and City Fringe Activity Area and benefits from excellent access to public transport, with a Public Transport Accessibility Level (PTAL) of 6b, on a scale of 1 to 6b, where 6b is excellent. As such, the application site is located in an area of the borough where hotel use is appropriate, in terms of both London Plan and local policy requirements. In addition, 10 per cent of the proposed guest bedrooms are designed to be wheelchair accessible (see the 'Design' section of this report), in accordance with Policy 4.5 of the London Plan (2011).
- 8.17 In terms of the potential for the scheme to compromise the supply of land for housing, it is noted that the existing dilapidated office and industrial building, by way of its design, layout and current condition would not lend itself to residential conversion (see paragraphs 8.5 and 8.6). It is further noted that the site is not designated for housing. In terms of the projected delivery of new housing over the plan period (up to 2025), it is anticipated that the Borough's housing targets will not only be met, but will be exceeded. For example, over the period 2017-2021 it is anticipated that 20,261 new homes will be achieved, whilst over the period 2021-2022 it is anticipated that 5,104 units will come forward, which is well in excess of the 2,885 annual target.
- 8.18 It is also noted that the site benefits from precedent for hotel use, as set by planning permission reference PA/05/00471, dated 13 June 2008, which granted consent for the erection of an eight storey hotel at the northern end of the site, comprising 15,002 square metres of C1 hotel floorspace (see paragraph 4.15). Therefore, in the absence of an extant consent for residential use on the site, it is considered that the proposed hotel development would not compromise the supply of land for new homes.

- 8.19 It is also considered that the proposed development would not result in any significant adverse impact on residential amenity, which is discussed further in paragraphs 8.48 to 8.83 of this report. In addition, the proposed servicing, coach parking and vehicle setting down and picking up movements are considered to be acceptable subject to condition, which is discussed further in paragraphs 8.84 to 8.93 of this report.
- 8.20 In term of the concentration of hotels in the surrounding area, Table 1 below provides a summary of both the existing and approved hotels located in the surrounding area:

Table 1: Existing and Approved Hotels in the Surrounding Area

<b>Address</b>	<b>No of Rooms</b>	<b>Distance from Site</b>	<b>Existing/Approved</b>
Ibis London City, 5 Commercial Street	348	100m to east	Existing
City Hotel, 12-20 Osborn Street	110	340m to east	Existing
Travelodge London Central Aldgate East Hotel, 6-13 Chamber Street	69	520m to south	Existing
15-17 Lemn Street	251	270m to south-east	Approved
Former Goodmans Fields	250	400m to south	Approved
Challenger House, 42 Adler Street	187	490m to east	Approved

- 8.21 From Table 1 it can be seen that there are three existing hotels located within 520 metres of the application site, which together provide a total of 527 hotel bedrooms. In addition, there are three extant planning consents for new hotels located within 490 metres of the application site, which if implemented would provide an additional 688 hotel bedrooms.
- 8.22 Given that application site is located within the CAZ and City Fringe Activity Area, which Policy 4.5 of the London Plan (2011) identifies as a suitable location for strategically important hotel provision, and given the scale of surrounding uses and the Mayor's target for the delivery of 40,000 net additional hotel bedrooms in London by 2031, it is not considered that the proposal would result in an over-concentration of hotels in the surrounding area.
- 8.23 Taking into account the above, it is considered that the proposed hotel is an appropriate use within this location and accords with the requirements of Policy SP06 (4) of the Council's adopted Core Strategy (2010), Policy DM7 (1) of the Managing Development DPD (Submission Version May 2012 with modifications) and Policy 4.5 of the London Plan (2011). These policies seek to ensure that new hotel developments are appropriately located within the town centre hierarchy in areas with good access to public transport, with at least 10 per cent of rooms being wheelchair accessible, and not resulting in an overconcentration of hotel uses on the surrounding area, nor compromising the supply of land for new housing.

## **Design**

### *Scale, Height, Mass, Bulk and Design*

- 8.24 Policy 7.6 of the London Plan (2011) states that buildings should be of the highest architectural quality and be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm. In addition, buildings should comprise details and materials that complement, not necessarily replicate, the local architectural character, whilst incorporating best practice in resource management and

climate change mitigation and adaptation, together with providing high quality indoor and outdoor spaces.

- 8.25 Policy SP10 of the Council's adopted Core Strategy (2010) seeks to ensure that buildings and neighbourhoods promote good design principles to create buildings, spaces and places that are high-quality, sustainable, attractive, durable and well-integrated with their surrounds. Policy DM24 of the Managing Development DPD (Submission Version May 2012 with modifications) seeks to ensure that design is sensitive to and enhances the local character and setting of the development, taking into account: the surrounding scale, height, mass, bulk and form of the development; building plot sizes and street patterns; building lines and setbacks, rooflines and streetscape rhythm; design details and elements, and; the natural environment.
- 8.26 The proposal is for the demolition of the existing 1960s office and industrial building and the erection of a new hotel building at the northern end of the site. The proposed hotel building would have a footprint of approximately 1,600 square metres and would range from 6 storeys in height at its northern end to 8 storeys in height at its southern end, together with an additional roof storey comprising a plant enclosure located at the southern end of the roof. The proposed building comprises a single block that is broadly square in plan form and includes a central lightwell with a courtyard at ground floor level. The proposal would retain the existing private road located adjacent to the northern boundary of the site for servicing, coach parking and disabled car parking, and would also introduce a new east/west pedestrian walkway through the middle of the site, adjacent to the south elevation of the proposed building.
- 8.27 In terms of scale and height, it is noted that the existing building has a footprint of approximately 3,300 square metres and ranges from 3 to 9 storeys in height. In addition, the wider Aldgate area is home to a number of large floorplate office buildings, including Beaufort House, which is located immediately to the west of the application site on the opposite side of Middlesex Street, which has a footprint of approximately 5,800 square metres and rises to a maximum height of 11 storeys, together with Aldgate House, which is located immediately to the south-west of the site, which has a footprint of approximately 2,700 square metres and is 9 storeys in height.
- 8.28 The scale and height of surrounding buildings lessens to the north and east of the site, with the adjacent buildings to the north of the site being 4 storey terraces, whilst the adjacent London Metropolitan University campus to the east of the site ranges from 4 to 5 storeys in height. It is noted that the proposed hotel building will step down to 6 storeys in height at its northern end is set back a further 13 metres from the south (flank) elevation of the adjacent 4 storey building at 38 Middlesex Street. As such, it is considered that the proposed building, by way of its height, siting and stepped roofline, suitably responds to the scale of the surrounding built form and public realm.
- 8.29 The proposed building incorporates a contemporary architectural vernacular and high quality materials and finishes, with the façade of the building comprising two distinct elements. Specifically, the lower storeys of the building are faced in reconstituted stone with square set fenestration set within deep reveals set at regular intervals, together with double height glazing openings at ground floor level. The upper storeys of the building are faced in metal cladding panels of alternating hues, and on the north, east and west elevation, include off-set narrow fenestration set within deep reveals that align with the fenestration on the lower floors.

Figure 4: CGI Visualisation of the Proposed Building



- 8.30 The southern façade of the building includes a greater extent of metal cladding, which is to be used from 3rd floor to 7th floor level, with the guest bedroom windows on the upper floors being set at an angle behind a metal clad screens so as to prevent direct overlooking to the south, and thus not unduly constrain the future development potential of the remainder of the site. These windows are angled facing both south-eastwards and south-westwards, with the direction alternating between floors.
- 8.31 The proposals also include the introduction of a new east/west walkway through the middle of the site, providing a pedestrian link from the public highway on Goulston Street to the east to Middlesex Street to the west. The proposed walkway would incorporate hard landscaping together with the introduction of new trees. The walkway would improve permeability through the site and the introduction of trees would soften the appearance of the southern façade of the building at street level and would enhance the visual amenity of the area generally, which is supported.
- 8.32 Officers consider that the proposed development is of a high quality in terms of its architectural design, use of materials and that the building is appropriate within the context of the surrounding built form and public realm in terms of its scale, height and bulk. It should also be noted that the proposed development has been through the Council's formal pre-application procedure and the final design incorporates Officers' recommendations made at both the pre-application and application stages. As such, the design of the scheme is supported by the Council's Development Design and Conservation Officer.
- 8.33 Taking into account the above, it is considered that the proposed building incorporates good design principles and takes into account and respects the local character and setting of the development site and its surroundings in terms of scale, height, bulk, design details, materials and external finishes. The proposal therefore accords with the requirements of Policy SP10(4) of the Council's adopted Core Strategy (2010), saved Policy DEV1 of the

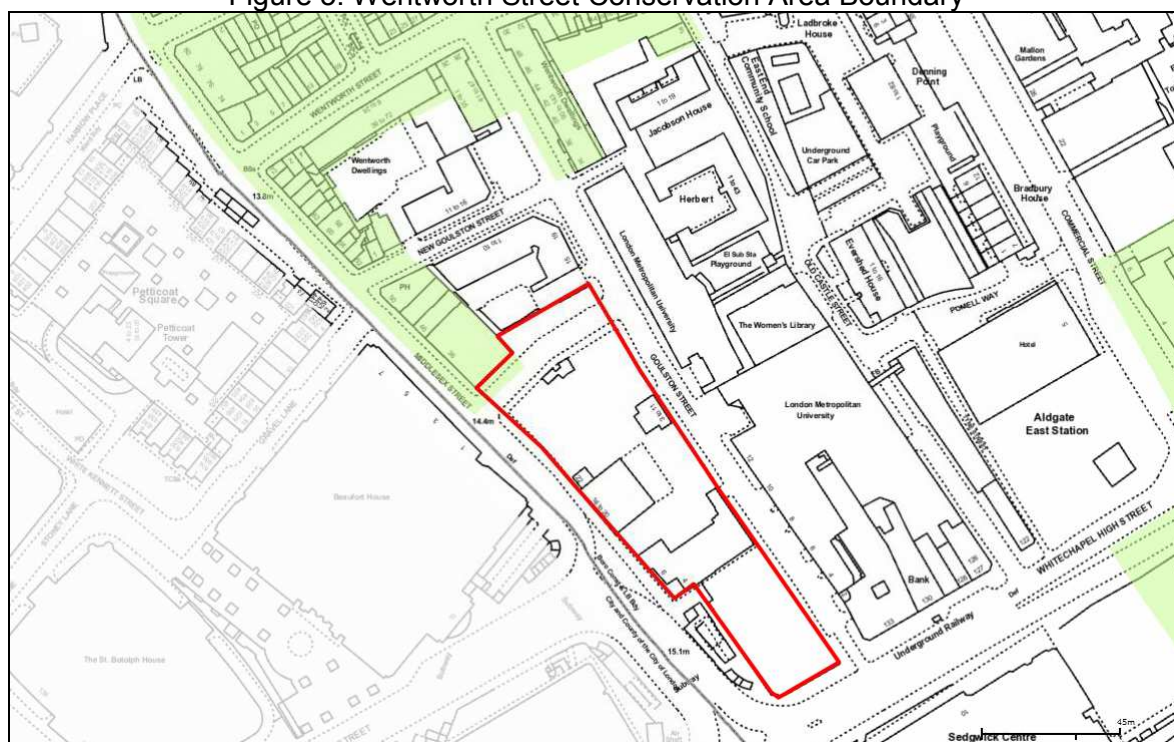


Unitary Development Plan (1998) Policy DM24 of the Managing Development DPD (Submission Version May 2012 with modifications), Policy DEV2 of the Interim Planning Guidance (2007), and Policy 7.4 of the London Plan (2011).

### Impact on the Wentworth Street Conservation Area

- 8.34 The north-east corner of the application site abuts the southern boundary of the Wentworth Street Conservation Area (see Figure 5). The heart of Conservation Area is centred around Wentworth Street, which lies approximately 100 metres to the north of the application site, although the boundary of the Conservation Area specifically extends southwards down Middlesex Street to include the terrace at 36-48 Middlesex Street, and whilst the terrace is not listed, the buildings are considered to positively contribute to the character and appearance of the wider Conservation Area.

Figure 5: Wentworth Street Conservation Area Boundary



- 8.35 In order to address the disparity in height and scale between the proposed hotel building and the adjacent terrace, the proposed building steps down to 6 storeys in height at its northern end, which together with the 13 metre physical separation distance provided by the service road, provides a suitable transition in height and scale between the buildings. In addition, the design of the west elevation of the building incorporates design queues from the front elevation of the terrace, including the use of double-height glazed openings with a strong vertical rhythm. As such, Officers consider that the proposed building would not adversely affect the setting of the adjacent terrace or wider Wentworth Street Conservation Area in views along Middlesex Street.
- 8.36 Taking into account the above, it is considered that the proposed building has been sensitively designed within the context of the historic built form and public realm and would preserve and enhance the setting of the Wentworth Street Conservation Area. The proposal therefore accords with Policy SP10(2) of the Council's adopted Core Strategy (2010), Policy DM27 of the Managing Development DPD (Submission Version May 2012 with modifications), Policy CON2 of the Interim Planning Guidance (2007), Policy 7.8 of the London Plan (2011) and government guidance set out in Section 12 of the National Planning Policy Framework (2012). These policies and government guidance seek to ensure that development proposals are sympathetic to their historic surroundings and preserve or

enhance the character and appearance of the Borough's Conservation Areas.

#### Treatment of the Southern (Cleared) Section of the Site

- 8.37 The proposal involves the demolition of the existing building, the clearance the site and the erection of a new hotel building at the northern end of the site. As such, whilst the proposed hotel development solely relates to the northern end of the site, consideration must therefore be given to the treatment of the remainder of the site pending any future proposals its separate redevelopment.
- 8.38 Given the size of the southern part of the site, which has a perimeter of approximately 240 metres, the boundary treatment for this part of the site will form a prominent part of the surrounding streetscape. It is further noted that the neighbouring authority of City of London are intending to carry out a range of public realm improvements to the Aldgate Gyratory and surrounding environs. Therefore, in order to ensure that the southern part of the site is of satisfactory appearance in the event that this part of the site does not come forward for development in the immediate future, consideration must therefore be given to the design and appearance of the boundary treatment for this part of the site.
- 8.39 In their email dated 25 January 2013, Rory McManus of DP9 proposes that the boundary treatment for the southern part of the site include a form of themed hoarding, which could in turn include information on the historic background of the area, together with images. Mr McManus also confirms that the applicant would consent to the inclusion of a condition to secure details of the treatment of the southern part of the site.
- 8.40 As such, if planning permission were to be granted, it is recommended that a condition be included to require the submission for approval of full details of the treatment measures for the southern part of the site, including the hoarding line as well as the interior of the site.

#### Accessibility and Inclusive Design

- 8.41 Policy 4.5 of the London Plan (2011) requires 10 per cent of hotel bedrooms to be wheelchair accessible. The proposed hotel would provide a total of 395 bedrooms, of which 39 would be wheelchair accessible, which equates to 10 per cent of bedrooms and thus accords with Policy 4.5. The majority of the wheelchair bedrooms are located a short distance from the lift core. Within the reception and bar/café areas at ground floor level, induction loops are provided for those with hearing impairment. In addition, an accessible WC is provided at ground floor level adjacent to the bar/café area. Furthermore, all internal signage will include Braille as well as visual lettering and numbering.
- 8.42 In addition, the proposal incorporates further inclusive access measures, including a single, easily identifiable main entrance for guests that is accessed from the public highway on Middlesex Street, which utilises electronically operated sliding glazed doors, with the hotel reception desk located within clear site of the entrance. Horizontal circulation within the building includes corridors ranging from 1.5 metres to 1.8 metres in width passing points and level access is provided to all wheelchair bedrooms, whilst all internal doors have an effective width of 800mm, which accords with the standards set out in BS 8300:2009.
- 8.43 Taking into account the above, it is considered that the proposed hotel includes adequate means of accessible and inclusive access, in accordance with saved Policy DEV1(4) of the Unitary Development Plan (1998), Policy DEV3 of the Interim Planning Guidance (2007) and Policy 7.2 of the London Plan (2011). These policies seek to ensure that development can be used safely, easily and with dignity by all persons regardless of disability, age, gender, ethnicity or economic circumstance.

## Energy and Sustainability

- 8.44 At a national level, the National Planning Policy Framework (2012) sets out that planning plays a key role in delivering reductions to greenhouse gas emissions, minimising vulnerability and providing resilience to climate change. The NPPF also notes that planning supports the delivery of renewable and low carbon energy and associated infrastructure. At a strategic level, the climate change policies as set out in Chapter 5 of the London Plan (2011), together Strategic Objective SO24 and Policy SP11 of the Council's adopted Core Strategy (2010) and Policy DM29 of the Council's Managing Development DPD (Submission Version May 2012 with modifications), require developments to make the fullest contribution to the mitigation and adaptation to climate change and to minimise carbon dioxide emissions.
- 8.45 The London Plan (2011) sets out the Mayor's energy hierarchy, which is for development to be designed to:
- Use Less Energy (Be Lean);
  - Supply Energy Efficiently (Be Clean); and
  - Use Renewable Energy (Be Green).
- 8.46 Policy DM29 of the Council's Managing Development DPD (Submission Version May 2012 with modifications) includes the target to achieve a minimum 35% reduction in CO<sub>2</sub> emissions above the Building Regulations 2010 through the cumulative steps of the Energy Hierarchy. Policy DM29 also requires sustainable design assessment tools to be used to ensure the development has maximised use of climate change mitigation measures. At present the current interpretation of this policy is to require all developments to achieve a minimum BREEAM Excellent rating.
- 8.47 Strategic Objective SO3 of the Council's adopted Core Strategy (2010) seeks to incorporate the principle of sustainable development, including limiting carbon emissions from development, delivering decentralised energy and renewable energy technologies and minimising the use of natural resources. Policy SP11 of the Core Strategy (2010) requires all new developments to provide a reduction of carbon dioxide emissions through on-site renewable energy generation.
- 8.48 The current application is accompanied by an Energy Strategy and Renewable Energy Report, prepared by Foreman Roberts, which follows the Mayor's energy hierarchy as detailed above. The strategy shows that the development would make use of energy efficiency and passive measures to reduce energy demand (Be Lean). The proposed development also includes the integration of a communal heating scheme incorporating a Combined Heat and Power (CHP) engine as the lead source of hot-water and space heating requirements, which accords with Policy 5.6 of the London Plan (2011) and will also reduce energy demand and associated CO<sub>2</sub> emissions (Be Clean).
- 8.49 The current proposals for delivering the space heating and hot-water are considered to be acceptable. However, it is recommended that an appropriately worded condition be applied to any permission to ensure that the development is supplied by the CHP (~70kWe) upon completion and prior to occupation.
- 8.50 A ~8.22kWp photovoltaic array is proposed to provide a source of on-site renewable energy (Be Green). The technologies employed would result in a 0.6% carbon savings over the regulated energy baseline. Through overshadowing constraints of the roof space and the maximisation of the communal system to deliver space heating and hot water it is acknowledged that achieving a 20% reduction in CO<sub>2</sub> emissions through renewable energy technologies is technically challenging and not feasible for all developments. Whilst the proposed development is not meeting the full requirements of Policy SP11 of the Council's adopted Core Strategy (2010), the Council's Sustainable Development Team support the application as the applicant has demonstrated that the design has followed the energy

hierarchy and sought to integrate renewable energy technologies where feasible.

- 8.51 The total anticipated CO2 savings from the development are 34.5%, through a combination of energy efficiency measures, a CHP power system and renewable energy technologies. The CO2 savings exceed the London Plan (2011) requirements and are only marginally short of the requirements of Policy DM29 of the Council's Managing Development DPD (Submission Version May 2012 with modifications). It is recommended that the strategy is secured by condition and delivered in accordance with the submitted Energy Strategy and Renewable Energy Report.
- 8.52 In terms of sustainability, the submitted information commits to achieving a BREEAM Excellent rating and a pre-assessment has been submitted to demonstrate how this level is deliverable. It is recommended that achievement of the excellent rating is secured through an appropriately worded condition with the final certificate submitted to the Council within 3 months of occupation. This is to ensure the highest levels of sustainable design and construction in accordance with Policy 5.3 of the London Plan (2011) and Policy DM29 of the Council's Managing Development DPD (Submission Version May 2012 with modifications).

#### Safety and Security

- 8.53 The application has been assessed by the LBTH Crime Prevention Officer, who raises no objections to the proposal in principle and recommends that any planning permission include a condition to require the development to accord with the Council's Secured by Design requirements. It is therefore recommended that such a condition be included if planning permission were to be granted, which should require the submission for approval of details including the design and specification of windows, doors and external lighting.

#### **Amenity**

- 8.54 Policy SP10 (4) of the adopted Core Strategy (2010), saved Policy DEV2 of the Unitary Development Plan (1998) Policy DM25 of the Managing Development DPD (Submission Version May 2012 with modifications) 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. Residential amenity includes such factors as a resident's access to daylight and sunlight, outlook, privacy and a lack of disturbance through noise and vibration.

#### Daylight and Sunlight

- 8.55 Daylight is normally calculated by two main methods, namely the Vertical Sky Component (VSC) and No Sky Line (NSL). Building Research Establishment (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 be no less than 20% of the former value, in order to ensure that sufficient light is still reaching windows. These figures should be read in conjunction with other factors, including NSL, which takes into account the distribution of daylight within the room, and figures should not exhibit a reduction beyond 20% of their former value.
- 8.56 Sunlight is assessed through the calculation known as the Annual Probable Sunlight Hours (APSH), which considers the amount of sunlight available during the summer and winter for each window facing within 90 degrees of due south (i.e. windows that receive direct sunlight). The amount of sunlight that a window receives should not be less than 5% of the APSH during the winter months of 21 September to 21 March, so as to ensure that such windows are reasonably sunlit. In addition, any reduction in APSH beyond 20% of its former value would be noticeable to occupants and would constitute a material reduction in sunlight.

- 8.57 It is noted that no letters of objection have been received from neighbouring residents on daylighting or sunlighting grounds.
- 8.58 The application is accompanied by a Daylight and Sunlight Report, prepared by GIA, which provides an assessment of the impacts of the proposed development on the daylighting and sunlighting conditions of nearby residential properties to the north and north-east of the site.

### **1-43 Herbert House**

- 8.59 Herbert House is a five storey block of flats located approximately 50 metres to the north-east of the proposed hotel building. The assessment has been carried out on windows and rooms on the south and west elevations of the building.

#### *Daylight*

- 8.60 The VSC and NSL results for all windows and habitable rooms show nominal impacts of less than 20%. As such, it is considered that the proposed development would not have any significant adverse impacts on the daylighting conditions within flats at Herbert House.

#### *Sunlight*

- 8.61 Of the 81 rooms in Herbert House that have been assessed, a total of 8 rooms would fail to meet BRE guidelines as they would suffer a reduction in APSH of more than 20% during the winter months, of which 3 rooms would suffer a reduction of 40% or more. It is noted that the impacts would be noticeably less over a full year, with only 3 rooms suffering a reduction in annual APSH of 20% or more.
- 8.62 It is also noted that all of the rooms that would suffer a material reduction in APSH face into the internal courtyard at the centre of Herbert House and as a result these receive very limited sunlight at the present time. As such, any small reduction in APSH would appear as a large reduction in percentage terms (e.g. a reduction of 1 APSH from 4 hours to 3 would be a 25% reduction, whilst a reduction from 20 hours to 19 hours would only be a 5% reduction). As such, Officers consider on balance that the sunlighting impacts on properties within Herbert House are not so significant so as to warrant refusal of planning permission on amenity grounds in this instance.

### **38-48 Middlesex Street (even)**

- 8.63 38-48 Middlesex Street is a four storey terrace that includes retail units at ground floor level and flats on the upper floors and is located to the north of the application site. This terrace includes Flats 1 to 18 Artisan House, which have the street address of 36 Middlesex Street and have been included in this assessment.

#### *Daylight*

- 8.64 The VSC and NSL results for all windows and habitable rooms show nominal impacts of less than 20%. As such, it is considered that the proposed development would not have any significant adverse impacts on the daylighting conditions within the flats at 46 Middlesex Street.

#### *Sunlight*

- 8.65 The affected windows at the rear of the building do not face within 90 degrees of due south and therefore receive no sunlight. A sunlight analysis is therefore not required.

### **1-10 New Goulston Street**

- 8.66 1-10 New Goulston Street is a four storey residential block located immediately to the north of the application site, which includes south facing windows that face towards the site.

#### *Daylight*

- 8.67 The VSC and NSL results for all windows and habitable rooms show nominal impacts of less than 20%. As such, it is considered that the proposed development would not have any significant adverse impacts on the daylighting conditions within the residential properties at 1-10 New Goulston Street.

#### *Sunlight*

- 8.68 Of the 16 rear facing habitable rooms, only 2 rooms would suffer a material reduction in APSH of over 20% during the winter months. However, it is noted that overall reduction in annual APSH would be less than 20% for all 16 habitable rooms. As such, whilst two habitable rooms within the building would suffer a perceptible reduction in sunlight as a result of the development, it is considered that these impacts would not be so severe as to have any significant adverse impacts on the amenity of the residential occupiers and thus should not warrant refusal of planning permission on amenity grounds in this instance.

### **21 Goulston Street**

- 8.69 21 Goulston Street is a four storey residential property located immediately to the north of the application site, which includes south facing windows that face towards the site.

#### *Daylight*

- 8.70 The VSC and NSL results for all windows and habitable rooms show nominal impacts of less than 20%. As such, it is considered that the proposed development would not have any significant adverse impacts on the daylighting conditions within the residential property at 21 Goulston Street.

#### *Sunlight*

- 8.71 Of the 6 rear facing habitable rooms, only 1 room would suffer a material reduction in APSH of 23.1% in the winter months, although this room would suffer a lesser reduction in APSH of 13.6% when calculated across the whole year. However, given that the 1 APSH failure is only slightly over the 20% BRE guidance threshold, and given that the overall APSH reduction for this room over a year would be under 20%, it is considered that the proposed development would not have any significant adverse impacts on the sunlighting conditions within the residential property at 21 Goulston Street.

### **19 Goulston Street**

- 8.72 19 Goulston Street is a four storey residential property located immediately to the north of the application site.

#### *Daylight*

- 8.73 The VSC and NSL results for all windows and habitable rooms show nominal impacts of less than 20%. As such, it is considered that the proposed development would not have any significant impacts on the daylighting conditions of the residential property at 19 Goulston Street.

*Sunlight*

- 8.74 The APSH results for all 6 rear facing habitable show nominal impacts of less than 20% at any time of year. As such, it is considered that the proposed development would not have any significant adverse impacts on the sunlighting conditions within the residential property at 19 Goulston Street.

**15 Goulston Street**

- 8.75 15 Goulston Street is a four storey residential property located immediately to the north of the application site.

*Daylight*

- 8.76 The VSC and NSL results for all windows and habitable rooms show nominal impacts of less than 20%. As such, it is considered that the proposed development would not have any significant adverse impacts on the daylighting conditions within the residential property at 15 Goulston Street.

*Sunlight*

- 8.77 Of the 6 rear facing habitable rooms, only 1 room would suffer a material reduction in APSH of 20.0% in the winter months, although this room would suffer a lesser reduction in APSH of 5.9% when calculated across the whole year. However, given that the 1 APSH failure is at the 20% BRE guidance threshold, and given that the overall APSH reduction for this room over a year would be significantly under 20%, it is considered that the proposed development would not have any significant adverse impacts on the sunlighting conditions within the residential property at 15 Goulston Street.

**13 Goulston Street**

- 8.78 13 Goulston Street is a four storey residential property located immediately to the north of the application site.

*Daylight*

- 8.79 The VSC and NSL results for all windows and habitable rooms show nominal impacts of less than 20%. As such, it is considered that the proposed development would not have any significant adverse impacts on the daylighting conditions within the residential property at 13 Goulston Street.

*Sunlight*

- 8.80 Of the 9 rear and side facing habitable rooms, 5 would suffer a material loss of APSH of over 20% during the winter months, 3 of which would suffer a loss of over 40%. However, all 9 habitable rooms would suffer BRE compliant APSH reductions of under 20% when calculated over the entire year. It is noted that the worst affected rooms all currently receive very limited levels of sunlight during the winter months, which results in a more significant reduction in percentage terms for each cumulative hour of daylight lost (over the six month 'winter' period). As such, given that the annual loss of APSH to all 9 habitable rooms is BRE compliant, it is not considered that the impacts on the sunlighting conditions during the winter months is so severe so as to warrant refusal on planning permission on amenity grounds in this instance.

Noise Disturbance (Impact on the Development)

- 8.81 The application site is situated in a central location adjacent to the Aldgate Gyratory and Whitechapel High Street, which carry large volumes of vehicular traffic. LBTH Environmental Health note that the Council's noise maps identify the site as falling within Noise Exposure Category (NEC) 'B' and 'C'. As such, the impact of environmental noise on the development is a material planning consideration in this instance.
- 8.82 Given that the proposed development is a hotel, the Council will require the development to include adequate noise mitigation measures to ensure that guests staying at the hotel are not subject to undue noise disturbance. The application is accompanied by a Noise Assessment, which includes the results of background noise surveys carried out at various locations around the site in both 2005 and 2007. The Noise Assessment also notes that the background noise levels exceed the bedroom noise levels required by the hotel operator and confirm that suitable noise mitigation measures will therefore need to be incorporated into the development.
- 8.83 The submitted Noise Assessment has been assessed by LBTH Environmental Health, who advise that the glazing will be required to meet BS 8233 (Sound Insulation and Noise Reduction for Buildings) in order to adequately protect the buildings occupants from undue noise disturbance. In their email dated 18 December 2012, Rory McManus of DP9 confirms that the applicant would consent to the inclusion of a condition to require the glazing specification to meet the requirements of BS 8233. LBTH Environmental Health confirm that this is acceptable. As such, if planning permission were to be granted, it is recommended that a compliance condition be included to require the glazing of the development to meet the requirements of BS 8233.

Noise Disturbance (Impact on Neighbouring Residents)

- 8.84 The proposals include the installation of plant on the roof of the hotel at 8<sup>th</sup> floor level, including multiple air handling units, a generator and the Combined Heat and Power (CHP) system for the site, all of which will generate noise when in operation. The application site lies immediately to the south of a number residential properties, including Flats 1-18 Artisan House, 36 Middlesex Street, 13-21 Goulston Street (odd) and 1-10 New Goulston Street to the north of the site. As such, consideration must therefore be given to the potential noise impacts of the development on neighbouring residents.
- 8.85 It is noted that the technical specifications for the proposed plant have not yet been finalised and as such the application and submitted Noise Assessment do not include any data on the projected noise emissions from the plant. However, given that the plant would be located at roof level, at a height significantly above nearby sensitive receptors (i.e. residential windows), and given the prevailing environmental noise levels at the site (NEC 'B/C'), it is considered that the potential noise impacts of the development on neighbouring residents can be adequately mitigated by condition. Such a condition should require the submission for approval of a detailed Plant Noise Assessment, to include a new background noise survey and calculations to demonstrate that the noise generated by the development would be at least 10 decibels [dB (A)] below the lowest background noise level [LA90] when received at the nearest sensitive residential façade.
- 8.86 Taking into account the above, subject to condition, it is considered that the proposal would adequately protect both users of the development and neighbouring residents from undue noise disturbance. The proposal therefore accords with the requirements of Policy SP10(4) of the Council's adopted Core Strategy (2010), saved Policies DEV2 and DEV50 of the Unitary Development Plan (1998), Policy DM25 of the Managing Development DPD (Submission Version May 2012 with modifications) and Policy DEV1 of the Interim Planning Guidance (2007). These policies 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.

## Highways

### Coach Parking and Servicing

- 8.87 The application site presently includes a private road that runs along the northern edge of the site, which provides access to and from the public highway at Goulston Street to the east of the site and Middlesex Street to the west of the site. The current proposals seek to retain and alter the existing private road, including the formation of a new service bay located adjacent to the service entrance to the building on the north elevation. The proposed service bay would be used both for servicing and coach parking.
- 8.88 The application is accompanied by a Transport Statement, which anticipates that the maximum size of servicing vehicles accessing the site will usually be a 7.5 ton box van with a length of 8 metres; although it is acknowledged that the use of larger 10 metre long servicing vehicles may be required on occasion. The Transport Statement also includes a vehicle swept path analysis plan at Figure 6, which that demonstrates that there is adequate width on both the public highway and the private service road for a 12 metre long coach to enter the site from the west, travelling north on Middlesex Street, to stop at the service bay, and to exit the site to the east, travelling southwards on Goulston Street.
- 8.89 Transport for London state in their consultation response that the Policy 6.13 of the London Plan (2011) requires the provision of 1 coach parking space per 50 guest bedrooms for hotels. As such, the proposed hotel, which comprises 395 guest bedrooms, would require the provision of 7 or 8 coach parking spaces in order to meet the London Plan's parking standards. However, TfL further state that given the location of the site and the type of hotel proposed, it is accepted that such amount is excessive. As such, TfL seek further clarification on the number of coaches that are likely to use the hotel and how on-site coach parking will be managed. It should be noted that the Council's parking standards in the Managing Development DPD (Submission Version May 2012 with modifications) require a lesser provision of 1 coach parking space per 100 guest bedrooms.
- 8.90 In their email dated 5 October 2012, Rory McManus of DP9 responds to TfL's request for clarification, stating that the proposed hotel operator, Travelodge; have advised that they have no requirements for coach parking. Notwithstanding this, the Council has been advised that Travelodge intend to implement a coach parking management system whereby any coach would need to be booked to use the coach bay and that it could only park for a limited time to embark or disembark hotel guests. TfL confirms that it is satisfied that the development will not impact on the capacity of the public transport network nearby.
- 8.91 The proposal as originally submitted included the formation of a new taxi layby on Middlesex Street. However, Officers raised concerns over potential impacts on pedestrian movements as the layby would reduce the effective width of the footway and the layby was subsequently removed from the proposal. In their email dated 27 March 2013, Rory McManus of DP9 confirms that taxi drop-off and pick-ups could take place on the private service road, which would ensure that stopped taxis would not adversely impact on the movement of vehicles on the public highway, which is supported.
- 8.92 The application site lies to the south of the Wentworth Street (Petticoat Lane) street market and is noted that there are road closures are in place on Sundays on both Middlesex Street and Goulston Street during the market trading period (9:00 to 14:00 hours) which would prevent servicing vehicles, coaches or cars accessing the service road at the northern end of the site, which can only be accessed (by vehicles) from Middlesex Street. It is further noted that the market set up period on Sunday morning and clear down period and subsequent street cleaning in the afternoon would further restrict vehicle movements on these streets outside of the road closure period. As such, servicing, coach parking and disabled parking

for the hotel would not be available for an extended period during the day on Sundays.

- 8.93 However, limited servicing on Sundays would still be possible outside of market trading / road closure hours and given the limited servicing requirements for the proposed hotel, which is anticipated to require approximately 15 servicing / waste collection trips per week, it is considered that the operation of the street market and associated road closures on Sundays would not significantly impact on the servicing of the proposed hotel.
- 8.94 It is also noted that Goulston Street is designated as a street market for its entire length from Monday to Saturday from 8:00 to 16:00 hours, although these are no road closures in place on these days. Market stalls are able to operate on designated pitches on the carriageway on Goulston Street, which are similar to on-street parking bays in terms of their size and location. It is noted that street market activity on Goulston Street during weekdays is predominantly located to the north of the site.
- 8.95 The applicant has submitted swept path analysis drawings which show that both a 10 metre long servicing vehicle and 12 metre long coach would be able to exit the service road onto Goulston Street and manoeuvre between the market stall and car parking bays on either side of the street. As such, whilst it is acknowledged that the street market could increase pedestrian and vehicular movements around the application site on weekdays, it is considered that sufficient evidence has been provided to demonstrate that coaches and servicing vehicles can safely enter and exit the site and proceed along the adjoining streets.
- 8.96 Both LBTH Transportation & Highways and LBTH Markets Team have assessed the proposals raise no objections, subject to the inclusion of a condition to secure a Servicing, Coach and Car Parking Management Plan. The plan must detail how on-site servicing and parking will be managed within the context of the street market and associated Sunday road closures.
- 8.97 Subject to condition, it is considered that the proposed servicing arrangements for the hotel are satisfactory and would not significantly impact on the capacity or safety or the road network, which accords with the requirements of Policy SP09(3) of the Council's adopted Core Strategy (2010), saved Policy T16 of the Unitary Development Plan (1998), Policy DM20(2) of the Managing Development DPD (Submission Version May 2012 with modifications) and Policy DEV17 of the Interim Planning Guidance (2007).

#### Car Parking

- 8.98 The application site presently includes an off-street car parking area at the northern end of the site at ground floor level, which is currently operated as a private car park and can accommodate approximately 100 cars. With the exception of a single off-street disabled parking space, located adjacent to the northern boundary of the site and accessed via the private service road, the current proposals do not include any provision of car parking spaces for guests or staff.
- 8.99 Given the central location of the site, together with its excellent access to public transport, with a Public Transport Accessibility Level (PTAL) of 6b, Transport for London welcome the 'car free' nature of the proposed development. However, LBTH Transportation & Highways do not consider the provision of a single disabled car parking space sufficient for a development of this type and scale, which they advise should include no less than 2 disabled car parking spaces, with one space for guests and the other for staff.
- 8.100 In their email dated 25 January 2013, Rory McManus of DP9 notes that a second disabled car parking space could be accommodated on-site, positioned perpendicular to the originally proposed disabled space. Mr McManus also confirms that the applicant would consent to the inclusion of a condition to secure a second disabled car parking space. As such, if planning permission were to be granted, it is recommended that a condition be included to require the

submission for approval of details of disabled car parking provision, to include plans showing the location of two spaces, together with autotrack drawings for the disabled bays, to take into account vehicle movements when the servicing / coach parking bay is occupied.

### Cycle Parking

- 8.101 The Council's cycle parking standards are set out in Appendix 2(1) of the Managing Development DPD (Submission Version May 2012 with modifications), which for Use Class C1 hotel use require the provision of 1 cycle space for every 10 staff and for every 15 guests.
- 8.102 The proposed hotel comprises 395 guest bedrooms and would employ 15 full-time staff and 42 part-time staff, with a total full-time equivalent of 36 staff. The proposal includes the provision of a total of 26 secure cycle parking spaces for guest, which equates to 1 space per 15 guest bedrooms, together with 5 secure cycle parking spaces for staff, which accords with the requirements of the Council's afore mentioned cycle parking standards.
- 8.103 The proposed guest cycle parking spaces would be provided in two separate locations adjacent to the south elevation of the building, positioned on the newly formed pedestrian walkway through the site, with 16 of the spaces being provided at the western end of the walkway, situated immediately adjacent to the main entrance to the hotel on Middlesex Street, whilst the remaining 10 spaces would be provided at the eastern end of the walkway, adjacent to the public highway on Goulston Street. All of the guest cycle parking stands would be covered, with possible design solutions for the cycle stands and shelters being shown on page 26 of the submitted Design and Access Statement.
- 8.104 The proposed staff cycle parking spaces would be located at the western end of the north elevation of the building, situated a short distance from the service entrance to the building. Secure cycle parking for staff would be provided in the form of fully enclosed cycle storage lockers, which include lockable roller shutters.
- 8.105 LBTH Transportation & Highways have assessed the proposed cycle parking arrangements and consider them to be acceptable, subject to the inclusion of a condition requiring the submission for approval of detailed plans and specifications for both the guest and staff cycle parking facilities, together with the inclusion of a compliance condition requiring the cycle parking facilities to be retained and maintained for use by guests and staff of the hotel for the life of the development. It is therefore recommended that such conditions be included if planning permission were to be granted.
- 8.106 Taking into account the above, subject to condition, it is considered that the proposal includes adequate secure cycle parking facilities, in accordance with Policy DM22(1) of the Managing Development DPD (Submission Version May 2012 with modifications), Policy DEV16 of the Interim Planning Guidance (2007) and Policy 6.9 of the London Plan (2011). These policies promote sustainable forms of transport and seek to ensure the developments include adequate provision of secure cycle parking facilities.

### Waste and Recyclables Storage

- 8.107 The proposed hotel includes an integral refuse and recyclables storage room measuring approximately 21 square metres, located at the northern end of the ground floor of the building, adjacent to the servicing bay. The proposed refuse and recyclables storage arrangements have been assessed by the LBTH Cleansing Officer, who notes that the waste storage arrangements are sufficient on the basis that collection takes place every day (i.e. seven times a week).
- 8.108 As such, if planning permission were to be granted, it is recommended that a condition be included to require the submission for approval of a Hotel Waste Management Plan, to

include details of the specific refuse and recyclables storage capacity at the site, together with confirmation that a contract has been entered into with a private waste management company and details of the frequency of collection. Such details should be approved prior to first occupation of the hotel.

- 8.109 In addition, given that there are road closures on Middlesex Street and Goulston Street on Sundays for the market, the Hotel Waste Management Plan must demonstrate that waste collection can be carried out on Sundays outside of the hours that the adjacent roads will be closed, or provide details on the increased waste and recyclables storage capacity that would be needed to accommodate two days' worth of refuse.
- 8.110 Subject to condition, it is considered that the proposal includes adequate facilities for the storage of waste refuse and recyclables, in accordance with Policy SP05 (1) of the Council's adopted Core Strategy (2010), saved Policy DEV55 of the Unitary Development Plan (1998), Policy DM14 of the Managing Development DPD (Submission Version May 2012 with modifications) and Policy DEV15 of the Interim Planning Guidance (2007). These policies require planning applications to be considered in light of the adequacy and ease of access to the development for waste collection and the adequacy of storage space for waste given the frequency of waste collections.

#### Anticipated Public Realm Improvement Works to the Aldgate Gyratory

- 8.111 The City of London are currently preparing a new strategy for environmental and transportation improvements within the Aldgate area, which are anticipated to include alterations and enhancements to the footway, carriageway and wider public realm around the Aldgate Gyratory, including the area of the gyratory adjacent to the south-west corner of the application site.
- 8.112 Whilst limited information has been provided by the City of London on the detail of the proposed improvement works as the strategy has yet to be adopted, City of London have raised concerns regarding the potential conflicts between the public realm improvement works and the proposed hotel development, if both works were to be carried out at the same time. Such conflicts could include road closures on the Aldgate Gyratory and southern end of Middlesex Street, which would have notable implications for the movement of demolition and construction vehicles to and from the application site. Fundamentally, it is important to note that the potential conflicts would only occur if both projects were being built at the same time. As such, Officers consider that there is no inherent conflict between the proposed hotel and wider public realm improvement works.
- 8.113 As such, if planning permission were to be granted, it is recommended that a condition be included to require the submission for approval of a Construction Environmental Management Plan, which must provide details of alternate routes for construction vehicles in the event road closures would prevent access to the site from the Aldgate Gyratory via Middlesex Street.

#### **Other Issues**

##### Archaeological Impacts

- 8.114 The application site lies within an area of Archaeological Importance or Potential as designated in the Proposals Map of the Unitary Development Plan (1998) and an Archaeological Priority Area as designated in the Proposals Map of the Managing Development DPD (Submission Version May 2012 with modifications). Accordingly, the application is accompanied by a Historic Environment Assessment, prepared by the Museum of London Archaeology, which includes a desktop study of the topography and geology of the site, together with an overview of past archaeological investigations that have been carried out within the site. The report also includes an assessment of the archaeological

potential of the site and the likely impact that the proposed development would have on archaeological assets.

- 8.115 The application and submitted Historic Environment Assessment have been assessed by English Heritage Archaeology, who note that the site lies just outside the City walls in an area used for human burials in the Roman period, which may be anticipated on the site depending on the degree of later truncation. It is further noted that the southern portion of the site was subject to an archaeological evaluation in 1999, when remains of a medieval chalk cellar were encountered. Of particular note is the Boar's Head Inn, which was converted into a Playhouse in the late 16th century, which is thought to be situated in the southern area of the site, although the evaluation did not identify any remains associated with the theatre within the trenches, although there is a possibility of contemporary features within the wider area. English Heritage Archaeology conclude that the proposed development may, therefore, affect remains of archaeological importance
- 8.116 Accordingly, English Heritage Archaeology advise that any planning permission should include a condition to secure the implementation of a programme of archaeological mitigation in accordance with a Written Scheme of Investigation, to be submitted to and approved in writing by the Local Planning Authority prior to the commencement of development or demolition works at the site.
- 8.117 Subject to condition, it is considered that the proposed development would not adversely affect any buried archaeological remains, in accordance with Policy SP10(2) of the Council's adopted Core Strategy (2010), saved Policy DEV43 of the Unitary Development Plan (1998), Policy DM27 of the Managing Development DPD (Submission Version May 2012 with modifications), Policy CON4 of the Interim Planning Guidance (2007) and government guidance set out in Section 12 of the National Planning Policy Framework (2012).

#### Contaminated Land

- 8.118 The application site and surrounding area have been subjected to former industrial uses, which have the potential to contaminate the area. Accordingly, the application has been assessed by LBTH Environmental Health (Contaminated Land), who consider the proposal acceptable subject to a condition requiring the developer to submit for approval a scheme to identify the extent of the contamination at the site, together with the measures to be taken to avoid risk to the public, buildings and environment when the site is developed. As such, subject to condition, it is considered that the proposal is acceptable in land contamination terms.

#### Air Quality

- 8.119 Policy DM9 of the Managing Development DPD (Submission Version May 2012 with modifications) requires applications for major developments to be accompanied by an Air Quality Assessment to demonstrate how the development will prevent or reduce associated air pollution during construction or demolition. In addition, Policy DM9 requires development located in the Tower Hamlets Clear Zone to demonstrate consideration of the Clear Zone objectives. The application site lies within the Tower Hamlets Clear Zone.
- 8.120 The application is accompanied by an Air Quality Assessment, prepared by Environmental Planning & Assessment Limited, which has been assessed by LBTH Environmental Health (Air Quality), who note that the submitted Air Quality assessment uses out-dated 2009 data, which is not in line with technical guidance, which requires the use of current data. In addition, given that the technical specification for the proposed plant has not yet been finalised, the modelled data for the plant is not included. LBTH Environmental Health will also require dust deposition monitoring at key receptor points during the demolition and construction phase, which can be agreed within the Construction Environmental Management Plan.

8.121 If planning permission were to be granted, it is recommended that a condition be included to require the submission for approval of an updated Air Quality Assessment, to include current data and modelling for all proposed plant.

Local Financial Considerations

8.122 Policy SP13 of the Council's adopted Core Strategy (2010), saved Policy DEV4 of the Unitary Development Plan (1998) and Policy IMP1 of the Interim Planning Guidance (2007) state that the Council will seek to enter into planning obligations with developers where appropriate and where necessary for a development to proceed.

8.123 The Community Infrastructure Levy Regulations 2010 state that any S106 planning obligations must be:

- (a) Necessary to make the development acceptable in planning terms;
- (b) Directly related to the development; and
- (c) Fairly and reasonably related in scale and kind to the development.

8.124 The general purpose of S106 contributions is to ensure that development is appropriately mitigated in terms of the impacts on existing social infrastructure such as education, community facilities and health care and that appropriate infrastructure to facilitate the development are secured. It is noted that objections to the proposed development have been received on the grounds that the uplift in residential population at the site will put a strain on local social infrastructure. However, it is considered that such impacts are mitigated through the contributions outlined below.

8.125 The S106 obligations for the scheme have been calculated using the formulae set out in the Council's adopted Planning Obligations Supplementary Planning Document (2012). The total financial contribution sought amounts to £157,384, and details of the breakdown are provided below.

Employment and Enterprise

8.126 The developer will be required to exercise endeavours to ensure that 20% of the construction phase workforce will be local residents of Tower Hamlets.

8.127 To ensure local businesses benefit from this development the Council will seek to ensure that 20% goods and services procured during the construction phase are achieved by businesses in Tower Hamlets.

8.128 The Council will seek to secure a financial contribution of £28,384 to support and/or provide the training and skills needs of local residents in accessing the job opportunities created through the construction phase of all new development. This contribution will be used by the Council to provide and procure the support necessary for local people who have been out of employment and/or do not have the skills set required for the jobs created.

8.129 The formulae for financial contributions towards construction phase skills and training is set out in the Council's Planning Obligations SPD (2012). The financial contributions for the current application have been calculated as follows:

$$\begin{array}{r} \text{Cost of Construction Training Placement (£2,605)} \\ \times \\ (\text{GIA of Development} \div 1000\text{sqm}) \\ = \\ \text{Required Financial Contribution} \end{array}$$

Thus

$$\begin{array}{r} 2,605 \\ \times \\ 10,896 \div 1,000 \\ = \\ \pounds 28,384 \end{array}$$

- 8.130 The council seeks a monetary contribution of £28,441 towards the training and development of unemployed residents in Tower Hamlets to access either:
- i) jobs within the hotel development in the end-phase
  - ii) jobs or training within employment sectors relating to the final development

- 8.131 The formulae for financial contributions towards end-user phase skills and training is set out in the Council's Planning Obligations SPD (2012). The financial contributions for the current application have been calculated as follows:

$$\begin{array}{r} \text{Employee Yield of Development(1 employee per 2 bedrooms for 3 star hotels)} \\ \times \\ \text{Employees Resident in Tower Hamlets (14\%)} \\ \times \\ \text{Employees in Tower Hamlets Requiring Training and Support (38\%)} \\ \times \\ \text{Cost of Training and Support Per Person (\pounds 2,700)} \\ = \\ \text{Required Financial Contribution} \end{array}$$

Thus

$$\begin{array}{r} 198 \\ \times \\ 0.14 \\ \times \\ 0.38 \\ \times \\ 2,700 \\ = \\ \pounds 28,441 \end{array}$$

- 8.132 It is important that local employment is maximised through the end-user phase as the development will result in a loss of employment floor space (-4604sqm). The Council will therefore require the developer to provide 1 apprentice per £1 million of the total project cost during the construction phase, and for the hotel operator to attend a meeting with LBTH Employment and Enterprise prior to occupation, and for the hotel operator to provide Skillsmatch with information on all non-technical hotel vacancies 72 hours prior to general release. The Council would expect that this would include roles such as receptionists, housekeeping, room attendants, bar/waiting staff, customer service and security. Monitoring of employment and enterprise obligations will be discussed and agreed with the developer prior to commencement of works.

- 8.133 The proposed heads of terms are:

Financial Contributions

- (a) Employment and Skills Training (£56,825)

- (b) Idea Stores, Libraries and Archives (£4,335)
- (c) Leisure Facilities (£13,867)
- (d) Public Open Space (£27,613)
- (e) Public Realm (£51,660)
- (f) Monitoring (£3,085)

Non-financial Contributions

- (g) Commitment to 20% local employment during construction and end user phase and procurement during the construction phase in accordance with the Planning Obligations SPD.
- (h) Commitment to providing 1 apprenticeship per £1 million total project cost during the construction phase, and for the hotel operator to attend a meeting with LBTH Employment and Enterprise prior to occupation, and for the hotel operator to provide Skillsmatch with information on all non-technical hotel vacancies 72 hours prior to general release.

8.134 It is considered that the package of contributions being secured is appropriate, relevant to the development being considered and in accordance with the relevant statutory tests.

Localism Act (amendment to S70(2) of the TCPA 1990)

8.135 Section 70(1) of the Town and Country Planning Act 1990 (as amended) entitles the local planning authority (and on appeal by the Secretary of State) to grant planning permission on application to it. From 15th January 2012, Parliament has enacted an amended section 70(2) as follows:

8.136 In dealing with such an application the authority shall have regard to:

- a) The provisions of the development plan, so far as material to the application;
- b) Any local finance considerations, so far as material to the application; and
- c) Any other material consideration.

8.137 Section 70(4) defines “local finance consideration” as:

- a) A grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown; or
- b) Sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy.

8.138 These issues now need to be treated as material planning considerations when determining planning applications or planning appeals.

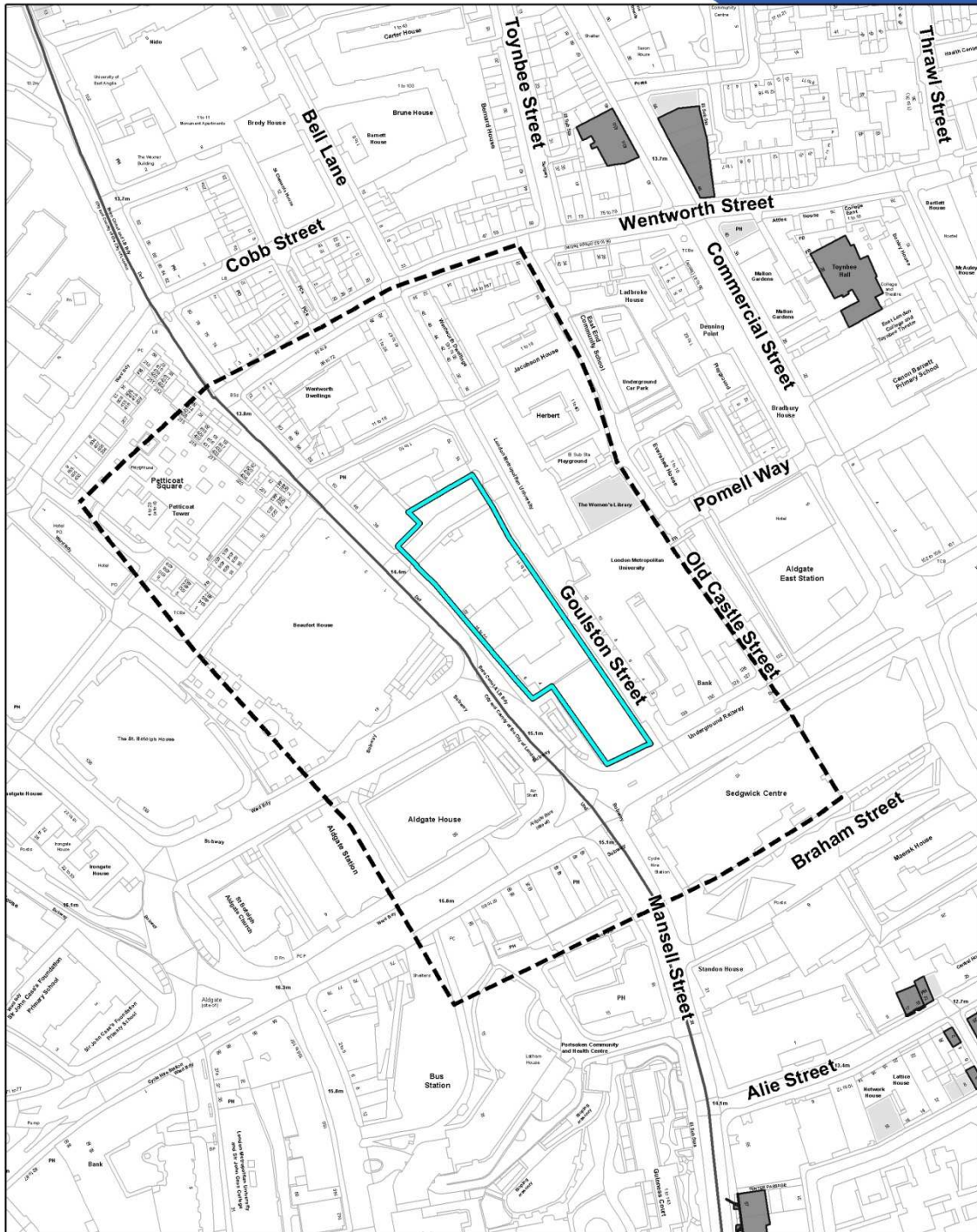
8.139 Regarding Community Infrastructure Levy considerations, following the publication of the London Mayor’s Community Infrastructure Levy, Members are reminded that the London Mayoral CIL is now operational, as of 1 April 2012. The likely CIL payment associated with this development would be approximately £380,000. It is noted that this is only an initial estimation of the CIL charge at this stage. The amount of the CIL payment may change when planning permission is issued, and final calculations for the scheme are carried out and any applicable exemptions are taken into account. The Council will issue a CIL Liability Notice as soon as possible after a decision notice is issued.

**9.0 CONCLUSIONS**

9.1 All other relevant policies and considerations have been taken into account. Planning Permission should be granted 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.

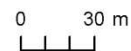


# Planning Application Site Map PA/12/02045



-  Planning Application Site Boundary
-  Consultation Area

-  Locally Listed Buildings
-  Statutory Listed Buildings



This Site Map displays the Planning Application Site Boundary and the neighbouring Occupiers / Owners who were consulted as part of the Planning Application process.  
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