



# REGULATORY SERVICES COMMITTEE

6 April 2017

# REPORT

**Subject Heading:**

P0092.17  
25-29 Market Place, Romford

Part change of use and conversion of ground, first and second floor retail floorspace; third floor extension; and elevational changes to accommodate an 85 bedroom hotel including restaurant (ground floor retail to be retained) (Application received 20<sup>th</sup> January 2017)

**Ward:**

Romford Town

**Lead Officer:**

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Planning Manager

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**Policy context:**

Local Development Framework  
The London Plan  
National Planning Policy Framework  
National Planning Policy Practice  
Guidance

**Financial summary:**

Not relevant

The subject matter of this report deals with the following Council Objectives

Havering will be clean and its environment will be cared for	[x]
People will be safe, in their homes and in the community	[x]
Residents will be proud to live in Havering	[x]

## SUMMARY

This is an application for a part change of use and conversion of ground, first and second floor retail floorspace; third floor extension; and elevational changes to accommodate an 85 bedroom hotel including a restaurant at 25-29 Market Place, Romford. This application, as alluded, seeks planning permission for a third floor extension to the building which together with the existing first and second floor is proposed to be used as a hotel inclusive of public restaurant. A retail use on the ground floor of the building would be maintained as part of the proposals.

This is a re-submission of a previous application which was refused planning permission. The applicant has sought to review the scheme in an attempt to overcome the reasons for refusal and in doing so has revised the proposed cladding and façade treatment, undertaken further transport assessments and provided additional information on proposed servicing arrangements.

## RECOMMENDATIONS

That the Committee notes that the development proposed is liable for the Mayor's Community Infrastructure Levy (CIL), in accordance with policy 8.3 of the London Plan, and that the applicable levy, based on the creation of 606m<sup>2</sup> new floorspace, would be £12,120.

That the proposal is unacceptable as it stands but would be acceptable subject to the applicant entering into a legal agreement under Section 106 of the Town and Country Planning Act 1990 to secure the following obligations by 6 October 2017 and in the event that the s106 agreement is not completed by such date the item shall be returned to the committee for reconsideration:

- A financial contribution of £10,000 towards local pedestrian dropped kerb improvements and the provision of a loading bay in Ducking Stool Court, to be paid prior to the commencement of development.
- All contribution sums shall include interest to the due date of expenditure and all contribution sums shall be subject to indexation from the date of completion of the Section 106 agreement to the date of receipt by the Council.
- The Developer/Owner to pay the Council's reasonable legal costs associated with the legal agreement, prior to the completion of the agreement, irrespective of whether the agreement is completed; and
- Payment of the appropriate planning obligations monitoring fee prior to the completion of the agreement.

It is therefore recommended that the Director of Neighbourhoods Assistant Director of Regulatory Services be authorised to enter into a legal agreement to secure the above and upon completion of that agreement, grant planning permission subject to the conditions set out below:

1. The development to which this permission relates must be commenced not later than three years from the date of this permission.

Reason:-

To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 (as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).

2. The development hereby permitted shall not be carried out otherwise than in complete accordance with the approved plans (as set out on page one of this decision notice).

Reason:-

The Local Planning Authority consider it essential that the whole of the development is carried out and that no departure whatsoever is made from the details approved, since the development would not necessarily be acceptable if partly carried out or carried out differently in any degree from the details submitted. Also, in order that the development accords with Policy DC61 of Development Control Policies Development Plan Document.

3. No works shall take place in relation to any of the development hereby approved until samples of all materials to be used in the external construction of the building are submitted to and approved in writing by the Local Planning Authority and thereafter the development shall be constructed with the approved materials.

Reason:-

Insufficient information has been supplied with the application to judge the appropriateness of the materials to be used. Submission of samples prior to commencement will ensure that the appearance of the proposed development will harmonise with the character of the surrounding area and comply with Policies DC61 and DC68 of the Development Control Policies Development Plan Document.

4. The building shall be constructed so as to provide sound insulation of 43 DnT, w + Ctr dB (minimum value) against airborne noise and 64 L'nT, w dB (maximum value) against impact noise to the satisfaction of the Local Planning Authority.

Reason:-

To prevent noise nuisance to adjoining properties in accordance with Policy DC55 of the Development Control Policies Development Plan Document.

5. No building shall be occupied or use commenced until a scheme for any new plant or machinery is submitted to and approved in writing by the Local Planning Authority to achieve the following standard - Noise levels expressed as the equivalent continuous sound level LAeq (1 hour) when calculated at the boundary with the nearest noise sensitive property shall not exceed LA90 - 10dB. Plant and machinery shall be maintained thereafter in accordance with the approved scheme.

Reason:-

Insufficient information has been supplied with the application to assess the noise levels of the plant or machinery to be used on site. Submission of this detail prior to occupation in the case of new building works or prior to the use commencing in the case of changes of use, will prevent noise nuisance to adjoining properties in accordance with Policies DC55 and DC61 of the Development Control Policies Development Plan Document.

6. No works shall take place in relation to any of the development hereby approved until an Air Quality Assessment has been submitted to and agreed in writing by the Local Planning Authority. The assessment shall detail how the development may impact upon local air quality, model the future impact, identify mitigation measures, provide full details of measures that will be implemented (or continue to be implemented) to protect both the internal air quality of the building and ensure that there is no adverse impact on air quality in the vicinity of the development. The use hereby permitted shall not commence until all measures identified in the Air Quality Assessment have been implemented to the satisfaction of the Local Planning Authority.

Reason:-

Insufficient information has been supplied with the application to assess the potential impact of the construction phase of the development and the use on the local air quality environment. The assessment required, together with the mitigation (as appropriate), will prevent undue air quality impacts in accordance with Policies DC52 and DC61 of the Development Control Policies Development Plan Document.

7. Before the use hereby permitted commences suitable equipment to remove and/or disperse odours and odorous material should be fitted to the extract ventilation system in accordance with a scheme to be designed and certified by a competent engineer and after installation a certificate to be lodged with the Local Planning Authority. Thereafter, the equipment shall be properly

maintained and operated within design specifications during normal working hours.

Reason:-

Insufficient information has been supplied with the application to judge the technical specifications of the extract ventilation system. Submission of this detail prior to commencement of the use will protect the amenity of occupiers of nearby premises and ensure that the development accords with Policy DC61 of the Development Control Policies Development Plan Document.

8. No works shall take place in relation to any of the development hereby approved until details of surface and foul water drainage works have been submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details.

Reason:-

Insufficient information has been supplied with the application to demonstrate how foul and surface water drainage would be managed. Submission of such details prior to the commencement of the development will ensure that sewage flooding does not occur, that sufficient capacity is made available to cope with the development and to ensure that the development accords with Policies DC49 and DC51 of the Development Control Policies Development Plan Document.

9. No works shall take place in relation to any of the development hereby approved until a scheme/details of how principles and practices of the Secured by Design award scheme are proposed to be adopted within the development. The scheme shall include, but not be limited to, details on proposed site security measures including CCTV cameras and the scheme shall be submitted to the Local Planning Authority for approval in writing. The development shall be implemented in accordance with the approved details.

Reason:-

Insufficient information has been supplied with the application to determine whether the proposals meet Secured by Design standards. Submission of such details is in the interest of crime prevention and community safety and guidance contained in Policies DC49, DC61 and DC63 of the Development Control Policies Development Plan Document.

10. Before the use hereby permitted commences a detailed scheme for the servicing arrangements of the hotel and retail unit shall be submitted to the Local Planning Authority for approval in writing. The scheme shall include details of vehicles proposed for servicing, timings and co-ordination, together with any measures proposed to ensure that vehicles do not pose an undue

safety risk to pedestrians or other vehicles. The arrangements shall be adopted and maintained for the life of the development hereby approved.

Reason:-

Details of the proposed servicing arrangements have only been submitted in draft/framework form. Requirement to submit details of exact measures will allow the Local Planning Authority to ensure measures suggested are implemented in the interests of highway and pedestrian safety and to comply with Policies DC32, DC36, DC61 and DC63 of the Development Control Policies Development Plan Document.

11. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015, no window or other opening (other than those shown on the submitted and approved plan) shall be formed in the flank wall(s) of the building(s) hereby permitted, unless specific permission under the provisions of the Town and Country Planning Act 1990 has first been sought and obtained in writing from the Local Planning Authority.

Reason:-

In order to ensure a satisfactory development that will not result in any loss of privacy or damage to the environment of neighbouring properties which exist or may be proposed in the future, and in order that the development accords with Policy DC61 of the Development Control Policies Development Plan Document.

12. All building operations in connection with the construction of external walls, roof, and foundations; site excavation or other external site works; works involving the use of plant or machinery; the erection of scaffolding; the delivery of materials; the removal of materials and spoil from the site, and the playing of amplified music shall only take place between the hours of 8.00am and 6.00pm Monday to Friday, and between 8.00am and 1.00pm on Saturdays and not at all on Sundays and Bank Holidays/Public Holidays.

Reason:-

To protect residential amenity, and in order that the development accords with Policy DC61 of the Development Control Policies Development Plan Document.

13. No works shall take place in relation to any of the development hereby approved until a Construction Method Statement to control the adverse impact of the development on the amenity of the public and nearby occupiers is submitted to and approved in writing by the Local Planning Authority. The Construction Method statement shall include details of:

- a) parking of vehicles of site personnel and visitors;
- b) storage of plant and materials;
- c) dust management controls;
- d) measures for minimising the impact of noise and ,if appropriate, vibration arising from construction activities;
- e) predicted noise and, if appropriate, vibration levels for construction using methodologies and at points agreed with the Local Planning Authority;
- f) scheme for monitoring noise and if appropriate, vibration levels using methodologies and at points agreed with the Local Planning Authorities;
- g) siting and design of temporary buildings;
- h) scheme for security fencing/hoardings, depicting a readily visible 24-hour contact number for queries or emergencies;
- i) details of disposal of waste arising from the construction programme, including final disposal points. The burning of waste on the site at any time is specifically precluded.

And the development shall be carried out in accordance with the approved scheme and statement.

Reason:-

Insufficient information has been supplied with the application in relation to the proposed construction methodology. Submission of details prior to commencement will ensure that the method of construction protects residential amenity. It will also ensure that the development accords with Policy DC61 of the Development Control Policies Development Plan Document.

14. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015, the building shall only be used for the purposes specified in the application and for no other purpose as defined within the Town and Country Planning (Use Classes) Order 1987 (as amended) or any provision equivalent to that use in any Statutory Instrument revoking and/or re-enacting that Order.

Reason:-

This application has been assessed on the basis of a specified use and it is considered appropriate to restrict this as alternative uses may have differing impacts on the town centre designation. This restriction is to comply with Development Control Policies Development Plan Document Policies CP4 and DC16 and Romford Area Action Policy ROM10. Applications for alternative uses would be considered on their individual merits.

#### Informative

1. A fee is required when submitting details pursuant to the discharge of conditions. In order to comply with the Town and Country Planning (Fees for

Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012, which came into force from 22.11.2012, a fee of £97 per request or £28 where the related permission was for extending or altering a dwellinghouse, is needed.

2. The Applicant is advised that planning approval does not constitute approval for changes to the public highway. Highway Authority approval will only be given after suitable details have been submitted, considered and agreed. Any proposals which involve building over the public highway as managed by the London Borough of Havering, will require a licence and the applicant must contact StreetCare, Traffic & Engineering on 01708 433750 to commence the Submission/ Licence Approval process.

Should this application be granted planning permission, the developer, their representatives and contractors are advised that this does not discharge the requirements under the New Roads and Street Works Act 1991 and the Traffic Management Act 2004. Formal notifications and approval will be needed for any highway works (including temporary works) required during the construction of the development.

The developer is advised that if construction materials are proposed to be kept on the highway during construction works then they will need to apply for a license from the Council.

3. Before occupation of the residential/ commercial unit(s) hereby approved, it is a requirement to have the property/properties officially Street Named and Numbered by our Street Naming and Numbering Team. Official Street Naming and Numbering will ensure that that Council has record of the property/properties so that future occupants can access our services. Registration will also ensure that emergency services, Land Registry and the Royal Mail have accurate address details. Proof of having officially gone through the Street Naming and Numbering process may also be required for the connection of utilities. For further details on how to apply for registration see: [www.havering.gov.uk/Pages/Services/Street-names-and-numbering.aspx](http://www.havering.gov.uk/Pages/Services/Street-names-and-numbering.aspx)
4. In promoting the delivery of safer, stronger, sustainable places the Local Planning Authority fully supports the adoption of the principles and practices of the Secured by Design Award Scheme and Designing against Crime. Your attention is drawn to the free professional service provided by the Metropolitan Police Designing Out Crime Officers for North East London, who can be contacted via email on: [DOCOMailbox.NE@met.police.uk](mailto:DOCOMailbox.NE@met.police.uk) or via telephone on: 0208 217 3813.
5. Due to the presence of National Grid apparatus in proximity to the application site, the applicant is advised to contact National Grid before any works are carried out to ensure that the aforementioned apparatus is not affected by the development.

6. The planning obligations recommended in this report have been subject to the statutory tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010 and the obligations are considered to have satisfied the following criteria:-
  - 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.
7. The proposal is liable for the Mayor of London Community Infrastructure Levy (CIL). Based upon the information supplied with the application, the CIL payable would be £12,120 (this figure may go up or down, subject to indexation). CIL is payable within 60 days of commencement of development. A Liability Notice will be sent to the applicant (or anyone else who has assumed liability) shortly and you are required to notify the Council of the commencement of the development before works begin. Further details with regard to CIL are available from the Council's website.
8. Statement Required by Article 35 (2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015: No significant problems were identified during the consideration of the application, and therefore it has been determined in accordance with paragraphs 186-187 of the National Planning Policy Framework 2012.

## REPORT DETAIL

### **1.0 Background**

- 1.1 This is a re-submission of a previously refused application (ref: P0489.16). The previous application which was for the same development/use as proposed by this application was refused planning permission for three reasons:
  - The proposed development would, by reason of its height, result in a unsympathetic, visually intrusive addition to the building. The proposed design, appearance and materiality of the development would not preserve or enhance the special character of this part of Romford Conservation Area and accordingly it is considered that the development is contrary to policies CP17, CP18, DC61, DC67 and DC68 of the Core Strategy and Development Control Policies Development Plan Document; and policies 7.4, 7.6 and 7.8 of the London Plan.
  - The proposed development would, as a result of the lack of drop-off facility, result in vehicles parking and waiting on Market Link to the detriment of traffic flow and highway safety, contrary to policies DC32, DC33 and DC61 of the Core Strategy and Development Control Policies Development Plan Document; and policies 6.1, 6.3 and 6.13 of the London Plan.

- The proposed servicing arrangements would result in vehicles reversing from Market Link into Ducking Stool Court which would be hazardous to highway and pedestrian safety, contrary to policies DC32, DC36 and DC61 of the Core Strategy and Development Control Policies Development Plan Document; and policies 6.1 and 6.3 of the London Plan.

1.2 The applicant has as part of this re-submission sought to review the cladding and façade treatment of the building; undertake further assessments in terms of traffic flow and highway safety; and further detail the servicing arrangements. The revisions made are assessed in the below sections of the report in context of planning policy and the original reasons for refusal.

## **2.0 Site Description**

2.1 The application site comprises 25-29 Market Place, which is located on the corner of Market Link and extends to Ducking Stool Court. The property was previously occupied by TJ Hughes (the department store) however the building is now occupied by B&M Bargains on the ground floor only. The upper floors of the building (the first and second floors) are vacant.

2.2 With regard to the building itself, dating from the 1960's, the building is located prominently on the corner of Market Place and Market Link. The building is clad in ceramic and is Art Deco in style and appearance, with narrow window details. The Market Link elevation of the building is constructed in red stock bricks and similarly has narrow window details over all floors. The building is currently serviced to the rear, from Ducking Stool Court, with roller shutters to a loading bay.

2.3 In terms of the locality, given the sites town centre location, the surrounding land uses are principally retail in character. Immediately adjacent to the building, to which this application relates, is a four storey development comprising ground floor retail units and residential development on the first to third floors. On the opposite side of Market Link are two and three storey commercial units, next to which is St Edward the Confessor's Church. The Church is Grade II\* Listed. Ducking Stool Court to the rear, as previously referred, provides servicing access to the property, Romford Shopping Mall and access to the Romford Shopping Mall multi-storey car park. On the opposite side of Ducking Stool Court is a five storey apartment block (Hazeleigh House) and this adjoins the Travelodge Hotel.

2.4 In terms of designations, the Market Place elevation of the building forms the boundary of the Romford Conservation Area and the building in its entirety forms part of Romford Town Centre.

## **3.0 Description of Proposal**

3.1 This application seeks planning permission for the part change of use, refurbishment (including elevation changes) and a part extension to 25-29 Market Place to accommodate an 85-bedroom hotel and restaurant to be

operated by Premier Inn. In respect of the above, planning permission is sought to construct a third floor extension to the building. The extension would comprise 1,202m<sup>2</sup> floorspace.

- 3.2 The existing ceramic clad façade to Market Place and Market Link would, in addition to the extension, be over clad with a metallic effect cladding system. Following the previous refusal, the applicant has sought to review the colour scheme of this cladding and has now proposed the cladding in two red tones to complement rather than contrast the existing contextual palette.
- 3.3 The existing red brick elevations along Market Link and Ducking Stool Court are proposed to be retained but enhanced with improved window design. In respect of this, windows have been designed, generally, with louvred grills. The first floor windows to Market Place are nevertheless proposed deeper and omit the louvres to enhance activity and enhance the visual presence of the restaurant as a public element.
- 3.4 In terms of access, the hotel is proposed to be accessed via the Market Link elevation. This would provide access to an entrance lobby, stair core and two lifts to the first floor. On the first floor is the proposed main reception and restaurant area. The restaurant would be open to the public, not just customers of the hotel. 18 rooms would also be located on the first floor of the building with 67 rooms proposed on the second and proposed third floor of the building.
- 3.5 No car parking is proposed as part of the development with it suggested that guests could either utilise public transport (the site has a PTAL of 6a) or public car parks in close proximity of the site.

#### **4.0 Relevant History**

P0872.08 - Re-clad external facade and alterations to entrance doors to alter appearance - Refused 25/06/2008

A0041.04 - Internally illuminated shop sign - Approved with conditions 07/07/2004

A0042.01 - Shop signs - illuminated - Approved with conditions 15/06/2001

A0035.01 - Rectangular banner sign displayed on lamp column - Approved with conditions 08/05/2001

P0489.16 - Part change of use and conversion of ground, first and second floor retail floorspace; third floor extension; and elevational changes to accommodate an 85 bedroom hotel including restaurant – Refused 06/09/2016. Appeal submitted.

The Local Planning Authority also has an open enforcement case relating to this building and the provision of unauthorised advertisement signs. Whilst some signs were removed from the building in 2015, investigations are still on-

going with regard to one remaining sign on the south-west elevation of the building.

## **5.0 Consultations/Representations**

5.1 475 properties were directly notified of this application. The application was also advertised by way of site notice and press advert. No letters of public representation have been received.

5.2 Consultation has also undertaken with the following:

Anglian Water - No comments received.

EDF Energy - No comments received.

Essex and Suffolk Water - No objection.

Highway Authority - No objection subject to a £10,000 financial contribution for local pedestrian dropped kerb improvements and the provision of a loading bay in Ducking Stool Court.

Historic England - Offer no comment. The application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.

London Borough of Havering Environmental Health - No objection. It is however recommended, given the former use of the site, and uses nearby, that consideration should be given to the requirement for contamination surveys, should additional foundations be required to support the extension. It is also recommended that an Air Quality Assessment inclusive of details of equipment proposed to remove and/or disperse odours and odorous material as part of the extract ventilation system; a scheme for any new plant or machinery to ensure that no such plant or machinery is installed to exceed LA90 -10dB at the nearest noise sensitive premises; and a scheme for sound insulation be secured by condition.

London Fire Brigade - No objection.

Metropolitan Police (Designing Out Crime) - No objection although it is recommended that measures demonstrating how the principles and practices of Secured by Design are proposed to be incorporated into the development be secured by condition.

National Grid - National Grid has identified that it has apparatus in the vicinity of the development site. The contractor should contact National Grid before any works are carried out to ensure that our apparatus are not affected.

Romford Civic Society - No comments received.

Thames Water - No objection. It is the responsibility of the developer to make proper provision for drainage to ground, water courses or a suitable sewer. Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the planning application.

UK Power Networks - No comments received.

## **6.0 Relevant Policies**

- 6.1 LDF Core Strategy and Development Control Policies Development Plan Document (LDF): CP3 - Employment, CP4 – Town Centres, CP9 - Reducing The Need To travel, CP15 – Environmental Management, CP17 – Design, CP18 – Heritage, DC13 – Access To Employment Opportunities, DC14 - Hotels, DC15 – Locating Retail and Service Development, DC16 – Core and Fringe Frontages in District and Local Centres, DC32 - The Road Network, DC33 - Car Parking, DC36 - Servicing, DC40 - Waste Recycling, DC49 - Sustainable Design and Construction, DC50 - Renewable Energy, DC51 - Water Supply, Drainage and Quality, DC52 – Air Quality, DC53 - Contaminated Land, DC55 - Noise, DC56 – Light, DC61 - Urban Design, DC62 – Access, DC63 - Delivering Safer Places, DC67 Buildings Of Heritage Interest, DC68 Conservation Areas, DC72 - Planning Obligations
- 6.2 The Council's Designing Safer Places SPD, Heritage SPD, Landscaping SPD, Sustainable Design and Construction SPD, Planning Obligation SPD, Romford Area Action Plan and Romford Town Centre Development Framework
- 6.3 London Plan: 2.6 - Outer London: Vision and Strategy, 2.7 - Outer London: Economy, 2.8 - Outer London: Transport, 2.15 – Town Centres, 4.5 – London's Visitor Infrastructure, 4.7 – Retail and Town Centre Development, 5.3 – Sustainable Design and Construction, 5.13 - Sustainable Drainage, 5.21 - Contaminated Land, 6.1 - Strategic Approach, 6.3 - Assessing Effects Of Development On Transport Capacity, 6.9 - Cycling, 6.13 - Parking, 7.2 - An Inclusive Environment, 7.3 - Designing Out Crime, 7.4 - Local Character, 7.5 - Public Realm, 7.6 - Architecture, 7.7 - Location and Design Of Tall And Large Buildings, 7.8 - Heritage Assets and Archaeology, 7.14 - Improving Air Quality, 7.15 - Reducing And Managing Noise, Improving And Enhancing The Acoustic Environment And Promoting Appropriate Soundscapes, 8.2 - Planning Obligations and 8.3 - Community Infrastructure Levy
- 6.4 Government Guidance: National Planning Policy Framework and National Planning Practice Guidance

## **7.0 Mayoral CIL Implications**

- 7.1 In consideration of the net amount of non-residential accommodation which would be created (606m<sup>2</sup>) by this development, a Mayoral CIL contribution of £12,120 would be required should planning permission be granted.

## **8.0 Appraisal**

- 8.1 It is considered that the key issues in the determination of this application are the principle of the development; the proposed design of the extension and re-cladding and the impact of this on the street-scene and conservation area; any potential impact on near-by residential amenity; and any potential impact on local infrastructure and congestion. With in-particular consideration being given to the changes made to the scheme following the previous reasons for refusal.

### **Principle of Development**

- 8.2 Policy DC14 of the Core Strategy states that Romford is the preferred location for large scale hotel development. The supporting text to the policy states that hotels strengthen the wider role of the town centre and provide a range of employment opportunities. The present trend of increasing numbers of tourists visiting London is expected to continue and the Greater London Hotel Demand Study (2006) estimated that the hotel stock in Havering represented just 0.3% of the total London supply. The Study estimated that between 2007 and 2026, an additional 330 new hotels rooms would be required in Havering and with regard to this it is even suggested that additional demand may exist following the completion of major infrastructure projects such as Crossrail.
- 8.3 Policy 4.5 of the London Plan states that Boroughs should support London's visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors, seeking to improve the range and quality of provision, especially in outer London. In respect of this, and planning decisions, development should contribute towards the hotel provision target (40,000 net additional hotel rooms by 2036) and ensure that 10% of rooms are wheelchair accessible. Decisions should furthermore seek to ensure that hotels are located in areas consistent with strategic location principles.
- 8.4 This site is located within Romford town centre. Policy DC16 of the Core Strategy and policy ROM10 of the Romford Area Action Plan both state that in district centres or retail cores (such as Romford) planning permission for non-retail uses will only be granted in certain instances. Both policies nevertheless relate to just the ground floor of buildings and whilst changes would be required to facilitate access to the hotel, the A1 retail use of the ground floor would be maintained in this instance.
- 8.5 The main entrance to the hotel, proposed off Market Link, would have an active frontage and would be open during shopping hours and as such it is not considered that the use *per-se* would significantly harm the character, function and vitality and viability of the town centre. The Romford Town Centre Development Framework, with regard to this, suggests that opportunities to provide additional activity in the form of residential uses (including hotels) above retail areas should furthermore be encouraged.
- 8.6 Noting the above and the policy position portrayed in respect of the preferred location for hotels, no principle objection is raised to this development coming forward. This site is located in an area with an excellent PTAL rating (6a) and

is considered highly accessible by a number of different methods of public transport.

### **Design and Impact on the Street Scene and Conservation Area**

- 8.7 Policy DC61 states that planning permission will only be granted for development which maintains, enhances or improves the character and appearance of the local area. Development must (only criteria relevant to this application have been detailed) harness the topographical and ecological character of the site; respond to distinctive local building forms and patterns; compliment or improve the amenity and character of the area; reinforce, define and embrace the street; create or enhance and clearly define public and private realms; and be durable, flexible and adaptable.
- 8.8 Expanding on this Policy ROM7 of the Area Action Plan states that any new development with a frontage to the Market Place will be required to respect the scale and massing of existing buildings in the Market Place, to reinforce the sense of enclosure and emphasise its civic importance in line with ROM20. Policy ROM20 details that development will be required to:
- respect the scale and massing of existing buildings in the Market Place;
  - reinforce Romford's traditional street layout;
  - preserve or enhance the view of the spire of St Edward the Confessor along South Street from Romford Station and other local views which enhance the centre's legibility;
  - reinforce the prominence and importance of the High Street/North Street axis; and
  - increase civic pride by creating a sense of place.
- 8.9 As detailed in the 'Site Description' section of this report, this site is partially located within the Romford Conservation Area and also in close proximity to St Edward the Confessor's Church which is Grade II\* Listed. The statutory duty applied to Local Planning Authorities in the exercise of their planning function in respect of listed buildings and conservation areas is set out in Section 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Expanding and to some degree replicating that detailed in the Act, the NPPF suggests that when determining planning applications, local planning authorities should take account of:
- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - the desirability of new development making a positive contribution to local character and distinctiveness.

- 8.10 The Character Appraisal and Management Proposals for Romford Conservation Area notes that most of the later 20<sup>th</sup> century buildings in the Market Place (the building to which this application relates included) are a mix of bland frontages alongside Edwardian facades and 1930s buildings. It is suggested that there is not a predominant local material but most 19<sup>th</sup> century buildings are constructed in stock and dark red brick, with commercial buildings employing freestone for cladding and decorative work.
- 8.11 Policy DC67 of the Core Strategy states that planning permission involving listed buildings or their setting will only be allowed where:
- it does not involve the demolition of a listed building; and
  - it does not adversely affect a listed building or its setting.
- 8.12 Policy DC68 goes on to state that the character and appearance of conservation areas will be preserved or enhanced. Planning permission for development within conservation areas will only be granted where:
- it does not involve the demolition of a building that makes a positive contribution to the character or appearance of the area;
  - it preserves or enhances the character or appearance of the conservation area and is well designed;
  - it does not involve the loss of trees which contribute towards the character or appearance of the conservation area; and
  - in the case of Gidea Park Conservation Area, it ensures that all subdivision of plots particularly within the 1911 Exhibition and Competition housing areas result in plot sizes similar to those of surrounding properties.
- 8.13 Staff acknowledge, as noted in many adopted Council documents, that this building is made up of a number of largely 'blank' façades that do not positively contribute to the local environment. This impact is compounded by the location and prominence of the building, which by default plays a significant part in the perceived character of the area. On review of the proposed development and design, staff have considered the immediate context, the scale and form of the adjoining and adjacent buildings and that (development) to which planning permission exists for at 17-19 Market Place and within the Market Place itself.
- 8.14 It is accepted that the additional storey would be at contrast to that on the other side of Market Link and this impact/concern was raised as one of the reasons for refusal previously. However, staff note that since this decision was issued, as alluded above, there has been a resolution to grant planning permission (ref: P1483.16) for an extension to 17-19 Market Place to create six flats, which will increase this building to three storeys, plus ground, with residential accommodation also contained within a fully pitched roof. Mindful of this staff do not consider the extension would be overly incongruous or of a scale to significantly detract from the setting of Conservation Area.
- 8.15 The Romford Town Centre Development Framework details that buildings in the 'Historic Core' of the town centre (which includes Market Place) are generally between two and five storeys. Expanding on this, it is nevertheless

suggested that, as this is the most distinct area in the town centre, future development should seek to reinforce the historic character and contribute to the vitality of the area. Noting previously comments provided in this report with regard to the principle of a hotel in the town centre, staff turn to the design of the development. In respect of this, it is considered that the additional and enlarged windows, proposed as part of this application, would add to the architectural merit of the building and, overall, improve the street appeal of the building. The metallic effect cladding roof, visible along Market Link and Ducking Stool Court, furthermore would give the building a cleaner roof line.

- 8.16 Looking at the proposed material palette, and re-cladding of the building, the applicant has sought to review this, following the previous refusal and concerns about the colours chosen and impact on the conservation area. In respect of this, the applicant now proposes to clad the building in two tones of red, whereas previously it has been proposed in ceramic colouring. As an over clad the new cladding would sit slightly forward of the existing façade and commence above the re-clad canopy of the first floor, terminating at roof level, with a 150mm deep formed aluminium capping. The red shading now proposed follows discussions with staff and the review of a number of options/colourings suggested. Staff consider the red colouring to better reflect the neighbouring brick façade and better preserve the special character of this part of the Conservation Area. The pattern of cladding, with darker shades towards the bottom and a general vertical formation furthermore in staffs view helps define the building and reduce its bulk and mass.
- 8.17 On balance, staff therefore consider the revised scheme an improvement over the previous application. It is considered the proposal, in general, would improve the overall appearance of the building and in doing so the conservation area, subject to appropriate conditions requiring the submission of material samples to ensure the cladding and colouring are of sufficient quality and representative of that shown on the submitted drawings.

### **Impact on Amenity**

- 8.18 Policy DC61, in addition to that detailed above, states that planning permission will not be granted should development result in an unacceptable amount of overshadowing, loss of sunlight/daylight, overlooking or loss of privacy to existing and new properties.
- 8.19 Staff acknowledge that there are a number of residential properties (flats) in close proximity to the site. Staff however note that this site does form part of the Romford town centre designation, and planning policies seek to promote hotels in such locations. Whilst it is accepted that a hotel use would give rise to different amenity impacts than a retail unit, it is not considered that the use *per se* is so unneighbourly as to warrant refusal on its own. Appropriate conditions, as suggested by the Council's Environmental Health officer, could be imposed, should planning permission be granted, with regard to sound insulation, maximum noise levels from plant and machinery and odour extraction equipment and with these suitably secured it is not considered the impacts from the hotel use would be so significant to warrant refusal.

- 8.20 In terms of overlooking, loss of privacy and the relationship between bedrooms at the rear of the hotel facing out onto Ducking Stool Court, staff note that the four windows where views would be most prominent are proposed with a fixed hardwood timber louver. In consideration of this, although it is accepted that the use would likely give rise to some overlooking it is not considered that any such impact would severely impact on privacy at a level to be deemed contrary to policy DC61 of the Core Strategy.
- 8.21 With regard to the construction phase of the development, limited details have been provided on how vehicles would access the site during construction and furthermore, in general, how the construction phase would be managed. Although such impacts are not considered sufficient enough to warrant refusal, it is considered that conditions could be imposed, in terms of the requirement for a construction management plan to effectively ensure that the procedures proposed are acceptable and do not adversely impact on the day to living conditions of the occupiers of the adjacent development.

### **Highway Impact & Car Parking Provision**

- 8.22 Although no car parking provision is proposed as part of this application, this site has a PTAL rating of 6a (excellent) with the closest bus stops to the site located approximately 250m (westbound) and 440m (eastbound) from the site on A118 St Edwards Way. Romford rail station is approximately 650m from the site and there are also a number of public car parks open 24 hours a day, seven days a week, in the vicinity of the site.
- 8.23 With regard to above, the applicant, as part of the submitted Transport Assessment, has undertaken a survey of public car parks and demonstrated that sufficient capacity exists to meet the likely demand from the hotel use.
- 8.24 In terms of the specific highway related reasons for refusal previously, the applicant's transport consultant and the Highway Authority agree that the provision of a drop-off facility is not possible on Market Link given the existing extent of the built form and the size of the road and pavement. In respect of this, the applicant's transport consultant has nevertheless sought to review whether the lack of facility will give rise to any highway impacts in terms of safety and efficiency.
- 8.25 Following assessment undertaken it has been suggested that the hotel would result in circa 25 drop-offs and/or collections per day, at full occupation. In respect of this, and road capacity, the applicant has found that the two-way capacity of Market Link is circa 1500 vehicles per hour. In terms of the hotel use, the absolute worst case would be to assume that a vehicle dropping off or collecting would halve the capacity for a short period. Taking a hypothetical scenario where there are 10 drop-offs or collections in an hour, lasting two minutes each, the overall capacity of Market Link would be reduced to 1250 vehicles per hour. During non-market days, Market Place is most active with the area providing a car park for 160 vehicles. Assuming a 45 minute average stay, which is considered relatively short, a total of 400 hourly movements

would result (200 in, 200 out). This is therefore below the theoretical capacity (1250) with the 10 drop-offs or collections in an hour resulting from the hotel use. In fact, even with a stationary vehicle permanently on Market Link, capacity would only reduce to 750 which again is sufficient to support the 400 movements associated with the Market Place car park at peak without significant congestion resulting. Accordingly, whilst a drop-off facility may be considered ideal or necessary by Members, it has been demonstrated by the applicant that the proposed level of drop-offs and collections would not jeopardise the free movement of traffic on Market Link to a level to support a reason for refusal.

- 8.26 Expanding on this, whilst Market Link is subject to part time waiting and loading highway restrictions, the applicant's consultant has sought to confirm that the Highway Code does allow vehicles to stop while passengers board or alight on single yellow lines and single yellow kerb markings.
- 8.27 With regard to manoeuvres, it is expected that the majority of vehicle drop-offs and collections would take place on Market Link where the hotel entrance would be located. On days when the market is not open, Market Place is used as a short stay car park and accordingly it is suggested that after drop-off/collection vehicles would enter Market Place to turn around. On market days when Market Link is in effect a cul-de-sac, vehicles could either after drop-off or collection, turn in the road; or reverse into Ducking Stool Court. Surveys undertaken by the applicant's consultant have confirmed this to be common practice, as existing and it is not considered the level of activity generated from the hotel use would result in significant implications. No reason has however been found why the barrier on Market Link could also not be moved further towards Market Place, on market days, to allow drop-offs and collections right in front of the hotel entrance.
- 8.28 In terms of the servicing arrangements, and the second highway related reason for refusal, it is proposed that servicing vehicles would travel south along Market Link and enter Ducking Stool Court and park in the proposed loading bay. After unloading/loading the vehicle would then reverse back into Market Link and travel north, thus not entering Market Place. Alternatively, vehicles would travel past Ducking Stool Court on arrival and reverse back around the corner into Ducking Stool Court and the loading bay. After unloading/loading, vehicles would depart in forward gear, turning right out of Ducking Stool Court and onto the Ring Road. The proposed operator typically has the following weekly delivery schedule:
- seven linen deliveries / collections, which have a typical duration of 30 minutes;
  - three food deliveries, which have a typical duration of 40 minutes;
  - one beer / wine delivery, which has a typical duration of 45 minutes; and
  - four refuse collections, which have a typical duration of 20 minutes.

- 8.29 Noting the above, the proposed hotel use would likely result in circa 15 service vehicle arrivals and 15 service vehicle departures per week. These would take place between 06:30am and 18:00pm. In terms of the retail unit, the aforementioned would be additional vehicle movements to the approximately seven (14 vehicle movements) associated with deliveries to the retail use.
- 8.30 The Highway Authority, as part of the previous application, reviewed these figures, in context of potential vehicle movements that would result from full retail occupation of the building as existing and accept that the number of vehicle movements associated with a hotel use, when compared to a retail use, is similar. Accordingly, subject to a financial contribution towards local pedestrian dropped kerb improvements and the provision of a loading bay in Ducking Stool Court to facilitate the arrangements propose, it is not considered that the proposed hotel use would give rise to congestion at a level that would be deemed significant in context of paragraph 32 of the NPPF and contrary policy DC32 of the Core Strategy.
- 8.31 Staff, mindful of the previous reason for refusal in terms of pedestrian safety, note that the applicant has also now submitted a draft service management plan which seeks to ensure that servicing would be undertaken efficiently without undue disruption. In this regard additional safety measures including directional reversing warning sounders; CCTV; and the provision of on-site trained banksperson at arrival and departure of a vehicle are all proposed. Such measures, as part of a final management plan could be secured by condition and enforced during the life of the use to ensure that the arrangements do not give rise to undue highway and pedestrian safety concerns and staff have included this as an additional condition to the recommendation.

## **9.0 Other Considerations**

### Employment

- 9.1 As noted in the supporting text of policy DC14, hotels provide a range of employment opportunities. The applicant has suggested that the hotel proposed by this application would create in the order of 29 full and part-time jobs. Premier Inn, as a company, has a target of ensuring that 50% of jobs offered are taken up by those not either in employment, education or training aged 16-24. Premier Inn in this regard offers training and development programmes and apprenticeships to aid on-site learning. Although it is accepted that any formal use of the building would likely give rise to employment opportunities, the initiatives employed by the applicant are considered noteworthy and of a further social and economic benefit to the development coming forward.

### Land Contamination

- 9.2 Given that this site is noted as potentially contaminated, request has been made by the Council's Environmental Health officer that consideration be given to the need for a land contamination assessment. With regard to this, it is noted

that no excavation works would however be necessary to facilitate the proposals and as such it is not considered that a land contamination assessment is necessary as the ground would not be disrupted by the development.

## **10.0 Conclusion**

- 10.1 Planning policies aim to direct hotels towards town centre locations. Both the London Plan and the Core Strategy suggest that such locations are suitable for such development as they support visitor economies, stimulate growth and provide employment opportunities. Town centre locations are also normally highly accessible and therefore allow potential uses/occupants to access the facility via a number of transport methods.
- 10.2 Staff in view of the policy position portrayed in the London Plan and Core Strategy have no principle land-use objection to the provision of a hotel in this location, especially as a retail ground floor use would be maintained. That being said, it is noted that the front façade of the building in question does form part of a conservation area and the building is also close to a number of listed buildings.
- 10.3 With regard to this, and the previous version of this development, the building to which this application relates is not considered of high intrinsic value and it is not considered that it enhances the conservation area. Staff consider that the development proposed by this application an improvement on that submitted previously and more in keeping with the existing appearance of the conservation area. Whilst concerns were previously raised about the third floor extension, and the impact of this on the Conservation Area, staff mindful of the scale of development adjacent and that recently approved, do not consider that the extension would be over-bearing and it is not considered that the development or use would give rise to amenity impacts at a level to warrant refusal.
- 10.4 Whilst no designated car parking provision is proposed, in consideration of the PTAL level, the number of public car parks in the vicinity and the assessments undertaken by the applicant in terms of the existing road capacity it is not considered that the lack of such of a provision and/or a drop-off would result in significant impacts on highway safety or efficiency to be deemed contrary to policy and warrant refusal. Staff are furthermore content that the site can be serviced without undue impact subject to the provision of a loading bay being secured on Ducking Stool Court.
- 10.5 Subject to the imposition of appropriate planning conditions and the completion of the section 106 planning agreement, staff therefore consider that the development, on balance, complies with relevant planning policy and recommend that planning permission be granted.

## IMPLICATIONS AND RISKS

**Financial implications and risks:** None

**Legal implications and risks:** Legal resources would be required to prepare and complete the required Section 106 legal agreement. The s106 contribution is required to mitigate the harm of the development, ensure appropriate mitigation measures and comply with the Council's planning policies. Staff are satisfied that the contribution and obligations suggested are compliant with the statutory tests set out in the CIL Regulations relating to planning obligations.

**Human Resources implications and risks:** None

**Equalities implications and risks:** The Council's planning policies are implemented with regard to equality and diversity.

## BACKGROUND PAPERS

1. Application form, plans and associated documents received 20/01/2017.