

SOW/16-00972

17 October 2019

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LONDON
BIRMINGHAM
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Dear Aleksandra

Re: Planning Application PA/19/00804 for the demolition of existing building and erection of a building of up to five-storeys and two set back floors plus a lower ground floor to provide 109 rooms for short-term hostel and HMO accommodation at Panda House, 628-634 Commercial Road, London, E14 7HS

Further to the letter sent to the Council on 03 October 2019, it was indicated through email correspondences on 04, 07 and 10 October 2019 that a change to full hostel use could not be accepted under the current planning application. As a result, a new planning application would be required, with a new application fee. Whilst we do not agree with this stance, the Applicant wishes to continue with the current application.

A full package of information on the basis of the originally submitted tenured hostel/HMO use is enclosed as agreed at the meeting held with the Council's Planning, Housing, Design and Conservation Officer's on 16 August 2019. In the meeting, the proposed use, design and daylight and sunlight were raised as potential planning concerns that have now been responded to in full. Of particular importance, the proposal will remain a mix of hostel and HMO units: 31no. hostel units and 78no. HMO units and the building has also been set back to reduce the impact on the adjacent Church.

Supporting Documentation

Alongside this letter, the following documents have been submitted as part of a formal amendment and clarifying/supporting information for planning application PA/19/00804:

- Proposed Plans and Elevations;
- Design Response Document;
- Daylight and Sunlight Internal Assessment;
- Daylight and Sunlight BRE Rebuttal Statement;
- Heritage Appraisal, dated September 2019;
- Building Management Plan, dated September 2019, and
- Bat Appraisal, dated September 2019.

Revised Proposal

The scheme seeks to replace the existing building with a five-storey building, with two set back floors, representing two additional storeys of hostel development, as previously proposed.

The amended scheme comprises the following:

- The whole building has been set back from Commercial Road in line with the current building line and the previously consented scheme;
- Improved design and visibility of the entrance facing Commercial Road;
- Active frontage provided across the whole Ground Floor facing Commercial Road;
- Improved public realm along Island Row, and
- Improve servicing and cycle access arrangements.

Amenity spaces, kitchens and lounges on the ground floor are more visible, along with the entrance being more prominent.

Planning Considerations

Design

The proposal is of a similar (or less) massing compared to the neighbouring buildings; with its set back from Commercial Road and Mill Place's curb lines enhancing the breathing space to the adjacent, local listed Church. When seen in the context of the building to the west of the site, the proposals are broadly of a similar height and sit comfortably alongside. The elevations CGIs and photos provided in the supporting Design Response Document demonstrate that the proposed development will have no adverse impact on the Church in terms of loss of any views or overall setting. The proposed building and the Church can only be seen together from a limited part of Commercial Road, in one direction (east looking west), with the proposed building being hidden by the Church in the opposite direction. The increased set back means that there is no material impact on views toward the Church along either side of Commercial Road.

The supporting Heritage Appraisal concludes that the proposals can be regarded as preserving the character and appearance of the Conservation Area and the setting of nearby listed buildings, and further is a considerable enhancement over the existing Panda House.

Public realm improvements are proposed to extend to the cobbled street surface along Island Row and expand on the existing character of the surrounding area. New public space has been created in accordance with the initial landscaping proposed at the site, to further improve and connect the building to the surrounding streets - this is not the case at present at the existing building or its surrounding buildings.

The proposed café and open façade is to increase activity at Ground Floor level. At present there is a lack of positive street activity on Commercial Road. With High Street style retail that both occupants of the proposed development and neighbouring residents can use, the Applicant hopes to improve the connection of Panda House to the locale. This is the case given the area is predominately residential in nature, particularly the buildings opposite the site that have limited access to "leisure spots".

Daylight and Sunlight

The habitable rooms on the ground floor to the sixth floor would receive good access to daylight. The habitable rooms within the lower ground floor will receive lower levels of daylight. They will however still be acceptable for transient hostel and HMO occupiers.

The supporting Daylight and Sunlight and BRE Rebuttal documents provide detailed information on the above. The main conclusion drawn from the reports is that the proposed development provides good daylight and sunlight amenity.

Building Management

The site will operate as a hostel and HMO with short tenancies in mostly single occupancy rooms. A maximum of 181 bed spaces will be provided, whereby short-term licenses will be offered of up to three months at a time. Rents will vary depending on market and length of stay, with the strategy being to provide affordable rents below the current market rates.

The building will have a full-time Building Manager at the site, who will be responsible for the day-to-day management of the property, including reactive maintenance. Security, cleaning and maintenance will be dealt with in-house, by approved contractors and handymen, and the current method of deliveries will continue as existing.

Affordable Housing (HMO)

The Council's Housing Officer commented that "The applicant needs to confirm whether the HMO units would be affordable for people on low incomes." In response to this (and as explained at the previous meeting with the Council):

- The entire building product is lost cost housing.
- The HMO product is providing high quality accommodation compared to affordable one-bed flats in the E14 area.
- There is no adopted policy for affordable housing and HMO (policy DM3 of the Development Management Plan) – the policy referred to by the Housing Officer is for conventional residential accommodation (Use Class C3).
- The affordable one-bed flat in the E14 is more expensive than the Panda House offering (see appendix 1 and supporting Building Management Plan).
- Emerging policy D.H7(c) from the Council's draft Local Plan does not apply to this proposal – we are low cost housing, so no affordable housing is required.
- Emerging policy H18 from the Draft London Plan (July 2019 update) relates to large-scale shared living (co-living). It is clear from paragraph 4.18.1 that this policy does not relate to HMO and therefore does not apply to this proposal.

In our view, the proposal meets requirements for both adopted and emerging local policy, and London Plan policy, and affordable housing should not be implementable for the HMO product.

Other Matters

A preliminary bat survey was undertaken in September 2019 and it was considered that the site and building structure offered negligible opportunities for roosting bats. Following a detailed review of the site in terms of its structure, build type and condition together with the availability of roosting opportunities it was considered highly unlikely by an instructed Ecologist that any population would utilise the site for roosting. To this effect, no further survey work is required as part of the proposed demolition and redevelopment of the site.

A number of comments were provided to the Council from consultees that did not object to the proposal, subject to a number of planning conditions being adhered to. Planning conditions were recommended by Environmental Health Air Quality, Transport for London, Thames Water, Crossrail and the Metropolitan Police, and these planning conditions have been accepted on various dates by way of email correspondences with the Case Officer.

Conclusion

The proposed provisions accord with national and local policy in relation to social, economic and environmental factors and are therefore considered acceptable in planning terms. The revisions have responded fully to the comments received from the Council. We therefore respectfully request that the planning application be positively determined.

If you require any further information or have any queries in respect of the submitted documentation, please contact me on the details provided below.

Yours sincerely,

Silas Willoughby

Silas Willoughby (Oct 17, 2019)

Silas Willoughby

BSc (Hons) MA

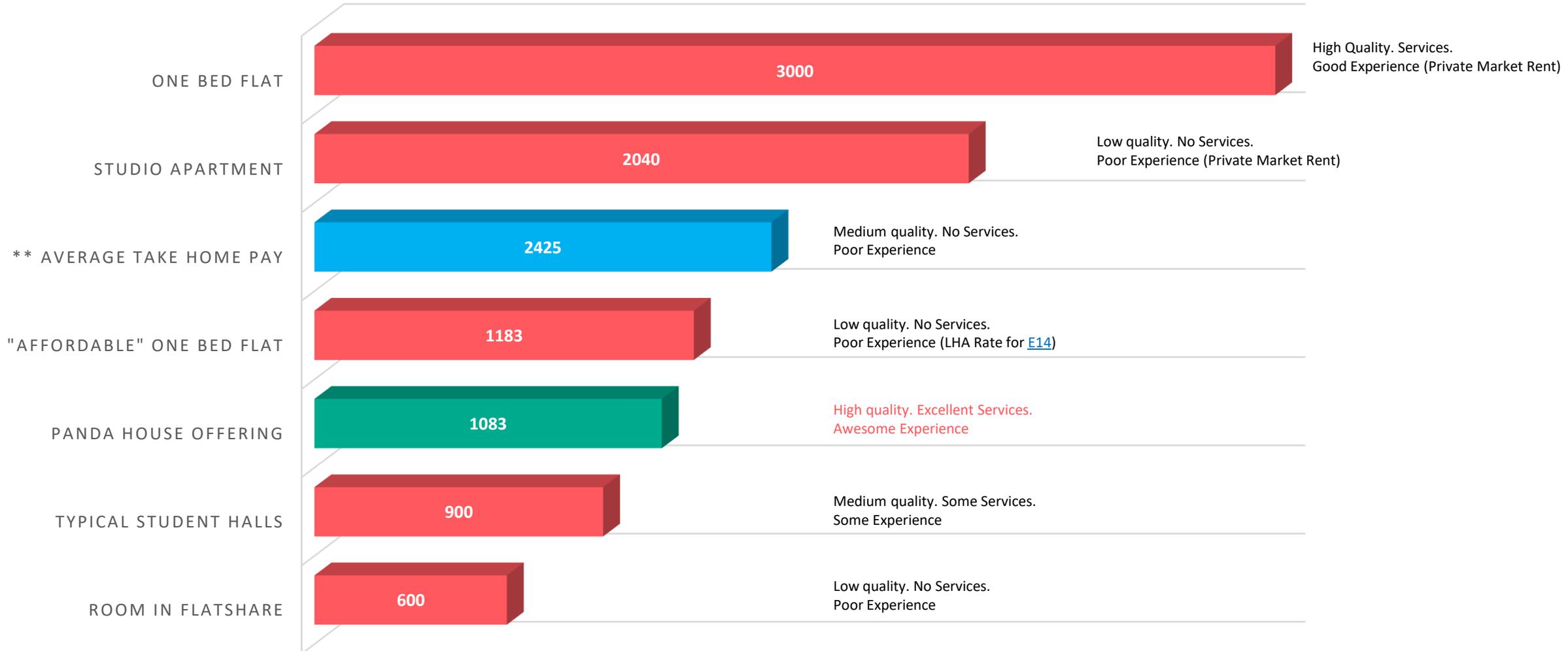
Planner

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E14 Rental Prices Per Calendar Month

PRICE IN £



** The average income in Tower Hamlets is £39,000. * Based on Tower Hamlet Evidence Pack.