
Appeal Decision

Hearing held on 21 March 2017

Site visit made on 21 March 2017

by Graham Chamberlain BA MSc MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 29th March 2017

Appeal Ref: APP/V5570/W/16/3165171

EasyHotel House, 80-86 Old Street, Islington, London EC1V 9AX

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by easyHotel UK Ltd against the decision of the Council of the London Borough of Islington.
 - The application Ref P2015/2680/FUL, dated 1 July 2015, was refused by notice dated 15 June 2016.
 - The development proposed is a change of use of part of ground floor to hotel (use Class C1) to provide a further 12 hotel rooms, and change of use of 3rd and 4th floors from office (use class B1) to hotel (use class C1) to provide a further 66 rooms (158 in total).
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Decision

1. The appeal is dismissed.

Preliminary Matters

2. At the hearing it was agreed by the Council and appellant that the appeal building currently includes 25 bedrooms on the ground floor, 32 and 35 on the first and second floors and 33 on each of the third and fourth floors. This gives a total of 158 bedrooms. It was therefore established that I should use the above description for the purposes of my assessment. The post code of the appeal site was also confirmed as EC1V 9AZ and the precise name of the appellant as easyHotel UK Ltd. During my site inspection I observed that the development has commenced and is broadly implemented.
3. An agreed Statement of Common Ground was submitted before the hearing opened. This document confirms that in light of the additional information submitted¹ with the appeal the Council were content to remove its objections articulated in the second limb of its second reason for refusal² as well as those in the third³ and fourth⁴ reasons. The Council qualified this by reinforcing the need to secure the additional details through the planning conditions appended to the Council's statement and agreed by the appellant. The Council also removed its objections in respect of its fifth reason for refusal in light of the submission of agreed planning obligations, in the form of a sealed legal agreement, before the hearing opened.

¹ I accepted the additional information as it did not significantly alter the proposal and interested parties were afforded an opportunity to provide representations

² Noise and general disturbance from an intensification of the hotel use

³ Inadequate provision of wheel chair accessible bedrooms

⁴ The effect on highway safety in respect of service vehicles

Main Issues

4. The main issues in this appeal, as agreed at the hearing, are:

- The effect of the proposal on the primary business role of the area and the function of the Central Activity Zone (CAZ); and
- Whether an intensification of the hotel use is appropriate at the appeal site.

Planning Policy

5. Policy 2.10 of The London Plan 2016 (LP) sets out the strategic priorities for the CAZ, which is to support and promote its role as a unique international, national and London-wide economic hub, including its important business services. The Policy seeks to promote a mixture of uses but especially seeks to support business related office development by removing any strategic constraints. This is because office based business activity underpins much of the capital's economic activity and appeal. Business uses can also provide high employment densities and this is necessary to achieve the substantial employment growth planned in the LP for the CAZ.
6. The strategy for the CAZ is supplemented by the Central Activities Zone Supplementary Planning Guidance 2016 (SPG). The SPG explains the importance of the office market to the success of the CAZ, including the generally more affordable existing office stock.
7. Policy 2.10 of the LP also seeks to sustain and manage the attraction of the CAZ as a leading visitor destination. This latter point is supported by Policy 4.5 of the LP which seeks to achieve 40,000 net additional hotel bedrooms by 2036. Part of the strategy outlined in Policy 4.5 is to shift the focus of hotel provision towards outer London. In respect of visitor accommodation, the SPG states in Section 2.3 that tourism is very important to the capital and should be supported. This includes business tourism.
8. Nevertheless, to ensure there is not a conflict between the business role of the CAZ and the provision of hotel accommodation, Paragraph 2.3.5 of the SPG explains that *'when considering potential impacts of new hotel development on the balance of local land uses, boroughs should consider whether additional hotel provision would negatively impact the availability of local employment and commercial floor space in the area (taking into account demand and viability)'*.
9. Although Policy CS7 of the Islington Core Strategy 2011 (CS) pre dates the LP it is nevertheless consistent with its aims as it seeks to support employment development within the Bunhill and Clerkenwell area. Employment development in this context includes office floor space and hotels. This is an overarching aim which the CS distils further in subsequent policies.
10. Policy CS13 seeks to encourage employment floor space with a particular emphasis on the provision of business floor space and space for Small and Medium Enterprises (SMEs). It also seeks to safeguard existing business space as well as employment space more generally, particularly when located in the primary employment location. The policy confirms that further guidance will be set out in development management policies. Policy CS14 of the CS suggests the appropriate location for visitor accommodation is in town centres. There is

nothing before me to suggest the policies in the CS are inconsistent with the National Planning Policy Framework. I therefore afford them significant weight.

11. Policy DM5.2 of the Islington Local Plan: Development Management Policies 2013 (DMP) flows from the relevant policies in the CS and LP and applies a greater level of detail to the broad strategic aims outlined within them. It states that proposals that would result in the loss or reduction of business floor space⁵ will be refused unless exceptional circumstances can be demonstrated, including through the submission of clear evidence that there is no demand for the business floor space. The evidence must demonstrate a period of marketing. In exceptional circumstances, the submission of a market demand analysis may be acceptable. Policy BC8 of the Finsbury Local Plan 2013 (FLP) effectively reiterates this requirement. Policy 4.11 of the DMP sets out those locations where hotel development is likely to be appropriate.
12. In the context of Policy DM5.2 of the DMP and Policy DC8 of FLP it is important to note the findings of the Council's Employment Land Study 2016 (ELS)⁶, which states that there is a net loss in B1 floor space across the borough and this needs to be viewed against the significant growth forecasts for employment and thus the subsequent demand for office floor space. The ELS recommends that low specification office space should be made available for the vibrant small business sector. Moreover, the study recommends that there should be a focus on intensifying office use in the CAZ area of the Borough and that planning policy should afford strong protection of all types of business floor space.
13. In light of the above, I do not share the appellant's view that the planning policy context underpinning the assessment of the appeal scheme is 'muddled', especially so as the DMP and FLP were found to be 'sound' by an examining Inspector. When the development plan is read as a whole there is a clear strategy for, and focus on, the provision and retention of business floor space, as a component of employment floor space, due to its important contribution to the CAZ. This is underpinned by evidence in the ELS. Visitor accommodation is supported through the development plan but not at the expense of business floor space. In the context of the development plan, visitor accommodation should only displace business floor space if the loss of that business floor space is justified by exceptional circumstances and if the visitor accommodation is in one of the locations specified in Policy 4.11 of the DMP.

Reasons

The effect of the proposal on the primary business role of the area and the function of the Central Activity Zone (CAZ)

14. From the above planning policy context it is clear to me that the regional and local strategy for development in the CAZ is one that seeks to support its business role by promoting new office floor space and safeguarding existing office floor space. As such, there would be material cumulative harm to the business role of the area and the function of the CAZ if business floor space was displaced by non-business uses when there was a reasonable prospect that

⁵ Business floor space is defined in the DMP as uses falling within a B1 use class, including office accommodation. Employment uses have a more general definition and includes offices, hotels and employment generating uses

⁶ By Ramidus Consulting Limited - The appellant has not disputed the methodology or findings of the ELS, which posts dates the submission of the planning application and is a comprehensive report drawing on many data sources. I therefore afford the findings of the ELS significant weight.

the business floor space could be occupied. Therefore it is incumbent on the appellant to demonstrate that there are exceptional circumstances that justify the proposed change of use.

15. At the hearing there was a discussion regarding the meaning of the term 'exceptional circumstances' as set out in Policy DM5.2 and Policy BC8. The Council was of the view it had a narrow definition, being a policy test that would permit a change of use of business floor space in an economic downturn when there was suppressed demand for office space. On the other hand the appellant considered the phrase should have its common meaning and this would include circumstances that were unusual or not typical. In this instance, and having considered the examining Inspector's report, I favour the appellant's approach as a policy test linked solely to the cyclical economic cycle would not give a sufficient degree of flexibility for considering local circumstances that might justify moving away from a business use.
16. The appellant has advanced a number of circumstances that together form a case for 'exceptional circumstances'. In summary these are that the building would be in an impractical and undesirable dual use, historically there were high vacancy levels when the floor space was in a business use, demand for the type of floor space that would be on offer is low, supply for office space is high and the existing hotel use provides a number of benefits. Taken together the appellant considers these are the exceptional circumstances necessary to justify the change of use when applying the relevant development plan policies. I have considered each in turn.

Dual use of the building

17. The appellant submits that business floor space on the third and fourth floors could not practically operate in the appeal building because of the presence of a hotel on the lower floors. This, it was suggested, is because the appeal building has a single entrance, reception and core and therefore hotel guests would be sharing the reception and lifts with office workers. This would discourage business operators from wanting to occupy the upper floors and could result in significant constraints on the safe and smooth operation of the hotel. In particular, the 'tail gating'⁷ of hotel guests as well as hotel guests inadvertently entering the office floors. In support of this proposition, the Crime Prevention Officer considers a single use of the building would be safer.
18. The above view was endorsed by Mr Parsons, an experienced hotelier. From my site inspection I was able to appreciate that there would be some clear disadvantages from the hotel sharing a reasonably small reception area with office based businesses on the third and fourth floors. This is because a large number of workers would need to pass through the reception and it would be difficult to distinguish hotel guests from office workers and their visitors. The Council were unable to provide examples of other sites where this situation was evident. This would suggest the circumstances would be unique.
19. The Council submitted that the appellant's argument is undermined by the original application⁸, when the compatibility of a hotel with upper floor offices was not seen as an inherent problem. However, Mr Parsons' explanation that this was down to the inexperience of the staff at the time has some plausibility

⁷ Hotel guest being 'tail gated' by non-guest as they move through secure doors

⁸ Ref. P101847 20 August 2010

in the absence of evidence that similar dual uses exist elsewhere. The Council also submitted a London Development Brochure prepared by Travelodge, which indicates hotels will often operate from within mixed use buildings. However, Mr Parsons explained that mixed use buildings with a hotel use would normally have separate entrances and a clear internal subdivision⁹. I have no reason to disagree, especially as Mr Parsons was formally a senior manager at Travelodge.

20. However, Mr Parsons confirmed that to his knowledge there was no evidence of any incidents of 'tail gating' when the building was in a dual use as a hotel with upper floor offices. This is an indication that this may not be a significant problem or could be managed or prevented. Moreover, simple security measures could be put in place to secure the offices from hotel guests and vice versa. Such measures are in place on the fifth floor with lockable doors that require a pin to enable entrance. It is also conceivable that this could be employed on the third and fourth floors if these were given over to offices and that receptions could be provided on these floors as a means of affording a greater sense of separation from the hotel. Moreover, there is also no substantive evidence before me that demonstrates the existing ground floor and reception area could not be reconfigured to provide more circulation space and a separate reception desk/area to serve the office floor space.
21. The appellant's argument is also somewhat undermined by their offer to provide affordable office space on the fifth floor. This could still result in 20-40¹⁰ office employees moving through the reception and lift. Whilst this would be a lower number than if the third and fourth floors were also occupied and thus easier to manage, it is still a noteworthy number that would compound the dual use of the building.
22. In summary, the dual use of the building could discourage some businesses from seeking to occupy the third and fourth floors. On balance, I consider the dual use of the building is likely to suppress the demand for a business use on the third and fourth floors. However, the critical point in respect of the dual use is the extent to which it would suppress the demand for office space on the upper floors. The most appropriate way to test this is through marketing/market research that would provide a realistic picture of the demand for the floor space. Without such evidence, this important aspect of the appellant's case is hard to quantify. Therefore, in the absence of robust marketing data, which I consider below, I cannot give the dual use sufficient weight as a determinative factor in establishing exceptional circumstances.

Historic vacancy levels

23. The third and fourth floors of the appeal building were marketed for a period by easyOffice following the previous planning application. In some respects the marketing adhered to Appendix 11 of the DMP in that advertising boards were displayed, information was placed online, easyOffice functioned as the commercial property agent and particulars were dispensed. In spite of this, the marketing only resulted in a 50% vacancy rate in an expanding serviced office market.

⁹ A point supported in a letter provided by architectural practice Axiom

¹⁰ This range was agreed at the hearing

24. The appellant suggested that the marketing was public and genuine and from the evidence before me this seemed to be the case. However, I have not been presented with a detailed analysis setting out the terms that the floor space was offered at, including the price. Nor has a schedule been provided setting out the number of viewings, the level of interest or any themes that came out of the marketing, which could have indicated, amongst other things, that a dual use of the building was a significant drawback. Moreover, the marketing is somewhat dated now given the changes in the commercial market and the economy.
25. In the absence of this information I cannot be satisfied that the 50% occupancy rate was predominately a result of the dual use of the building or any other supposed flaw, including the buildings external appearance or the quality of its internal fit out. Nor can I be confident the floor space would be wholly unattractive to SMEs due to its size and rental level. On the contrary, the 50% vacancy could be attributed to the easyOffice business model and the floor space could be desirable to firms on a more restricted budget or with a business model that does not require the office space they occupy to be an important component of their brand.
26. As a result, the historic marketing is not conclusive evidence that the provision of office floor space on the third and fourth floors would be inherently undesirable. Consequently, the lack of clear and robust marketing is a significant omission in the appellant's case that there are exceptional circumstances that justify the proposal.

The supply and demand of office space

27. Through the submission of a Market Demand Analysis¹¹ (MDA) the appellant has attempted to define the likely tenant profile for the appeal floor space were it in a business use. The MDA suggests the tenant profile for the area has moved from the service sector, such as accountancy and solicitor firms, to Media and Technology (TMT) firms. The argument is advanced that the building would be unsuitable for this tenant profile due to its appearance, fit out and from an association with a budget hotel operator. Moreover, the MDA gives examples of modern offices that have been constructed in the area which better cater for this tenant profile.
28. Whilst there appears to be a strong local demand for high quality office floor space from TMT firms, I have not been presented with substantive evidence that there is little or no demand from other firms seeking 'secondary' more affordable floor space¹², such as could be provided at the appeal site, or that these SME firms could not afford City Fringe rents. It is also unclear whether the quality of the appeal floor space could be viably improved. In this respect I note that the MDA indicates that standard office space can be leased to TMT firms when they are refurbished¹³.
29. The local demand also needs to be seen in the context of regeneration plans for the area, including a cycle route. This may increase the desirability of Old Street for the users of business floor space in the medium to long term.

¹¹ 80-86 Old Street, London EC1V 0AZ – Updated Marketing Report 2016 – Paul Goodsir BSc (HONs) MRICS

¹² The ELS suggests this space is still important to the local market

¹³ 3rd Floor 23-24 Baltic Street, London and 1-4 Floors 101 Turnmill Street, London EC1

Moreover, evidence supplied in relation to a reduction in the average deal size of lets¹⁴ could be construed as evidence to suggest demand is increasing for smaller office spaces such as the appeal site.

30. Whilst the updated MDA was prepared by Mr Goodsir, an experienced local commercial agent, I share the Council's concerns that the MDA focussed on an assessment of 'Grade A' office space, a category the appeal site is unlikely to fall within. The supply and demand of 'secondary' office floor space along Old Street is more difficult to ascertain from the information supplied. In this respect the appellant has suggested that similar office space, such as 60-64 Old Street has proved difficult to let. However, this is not determinative in the absence of evidence setting out how it was marketed and whether the vacancy was typical. Without evidence that the appeal floor space was comprehensively marketed without success, it is difficult to conclude with any certainty that there is no local demand, especially from SMEs, for secondary office floor space in the part of Old Street in which the appeal site is located.
31. Another component of the appellant's case for 'exceptional circumstances' is that at a broader level demand for office space in the area is falling whilst supply is increasing. The appellant refers to Co-star data, net absorption rates and the quantum of new office floor space nearby to support this proposition. The appellant suggests that vacancy levels in the area have increased from 4% to 8%, which is an indication that supply is outstripping demand.
32. However, the Council have referred me to its ELS, which states that 8% is the target for frictional vacancy rates as this allows sufficient capacity for natural turnover that retains rent levels at reasonable levels. A harmful oversupply would not be occurring until the vacancy rate significantly surpasses 8%. I afford this significant weight as it is not disputed by the appellant¹⁵. The evidence does not suggest the 8% vacancy threshold has been surpassed and it is too early to conclude that factors such as 'Brexit' and the elections in the USA will alter this.
33. In fact when applying the data in the ELS, the evidence suggests that the supply of office floor space is well below the demand when projected growth levels are factored in as well as the loss of office space outside the CPZ¹⁶, particularly changes of use granted through the GPDO¹⁷. Therefore, in a broader sense I am satisfied supply is not outstripping demand to such an extent that the loss of business floor space at the appeal site has had negligible consequences on the function of the CAZ, particularly when the loss is considered cumulatively with the other business floor space losses elsewhere in the Borough.

Benefits of the hotel use

34. Data from visitor surveys suggests that the hotel has a varied customer base with visitors staying at the hotel when away on business, when visiting the capital's attractions or when visiting friends and family. The appellant infers that this supports local business as the super budget nature of the hotel means visitors need to take meals away from the hotel. Moreover, the hotel provides

¹⁴ Reference was made to this in an Estate Gazette article provided by the appellant

¹⁵ As a wider point, the appellant has failed to robustly address the ELS in their submissions, which undermines the weight I can afford the MDA given the comprehensive nature of the ELS

¹⁶ Referenced by the Council through monitoring data

¹⁷ The Town and Country Planning (General Permitted Development) (England) Order 2015 as amended

accommodation for business tourism and supports the local community by providing space for friends and relatives to stay at an affordable price. The appellant therefore opines that the hotel use complements, and contributes towards, the function of the CAZ.

35. I am in no doubt that the hotel makes a positive contribution to the local economy and area, which is identified as having some deprivation. Nevertheless, the extent of this contribution is unclear, especially as the visitor survey data is unsupported by details of the scope and methodology of the survey, evidence of the local spend of visitors or comparative evidence with a business use. Therefore, I am unable to ascertain whether a hotel use of the third and fourth floors of the appeal building is a benefit that is materially greater than a business use would be.
36. If the floors were occupied as business floor space this could result in a higher employment density¹⁸ and thus greater local spend. Office workers are less likely to spend money locally on the weekend but business workers are likely to spend locally in shops, restaurants and hotels during the week. There is no evidence before me to suggest the local residential population cannot help to sustain the local weekend trade. Moreover, some of the 'visitor spend' from hotel guests is likely to be outside the Islington area given the site's excellent access to public transport. As such, the benefits may not be as great as suggested.
37. As part of the proposal, the appellant has entered into planning obligations that would commit the hotel business to local training and employment. Long term affordable workspace would also be provided on the fifth floor, which is a significant investment. These would be notable benefits of the proposal but the fifth floor is already occupied as an office so the proposal would not be creating new business floor space. It is also unclear how many local jobs the use of the third and fourth floors as visitor accommodation has created or would sustain. As such, these benefits are not determinative factors in favour of the proposal.

Whether there are exceptional circumstances that justify the loss of the business floor space

38. The question before me is whether, given the factors above, it is likely that the office floor space would be occupied. If this is the case then the hotel has displaced office floor space and this has harmed the primary business role of the CAZ. I accept that a dual use of the building would depress the demand for the office floor space but without evidence from robust marketing I cannot conclude this is a determinative matter.
39. Likewise, the absence of robust marketing means I can place little reliance on the design, appearance and layout of the building as the principal explanation for the historic 50% vacancy rate or, when considering the likely tenant profile, that there would be inadequate market interest in the space if refurbished to a reasonable standard. The MDA has not conclusively demonstrated that supply is significantly exceeding demand, both generally and locally, or that in the medium to long term the 'office pipe line' will be so great as to render the loss

¹⁸ The appellant suggested that there are around 50 jobs at the hotel. 16 of these were related to the head office. It is unclear how many jobs are linked to the use of the third and fourth floors but I am in no doubt a business use would likely result in a high jobs density. For example, it was agreed at the hearing that the fifth floor alone could provide up to 40 jobs. Of course, this is dependent on the floors being occupied for a business use but the appellant has not demonstrated with a sufficient degree of certainty that this would be an unlikely prospect.

of the appeal site as negligible. This is particularly so as the quantum of business floor space lost is not insignificant. Nor has the MDA demonstrated that an office use would be unviable.

40. The appeal scheme has resulted, and would result, in some benefits but these are hard to quantify and therefore I am unable to say with any confidence that the benefits of the hotel are/would be materially greater than the benefits that could materialise from a business use of the same floor space. This is especially so as there does not appear to be a shortage of visitor accommodation in Islington¹⁹ and the overarching strategy for London is to move hotel provision away from the city centre.
41. This balance also needs to be considered in the context of Policy BC8 of FLP, which seeks to maximise the provision of business floor space. I am not satisfied from the evidence before me that the maximum amount of business floor space that can reasonably be provided in the appeal building is the fifth floor alone. This is because there is a general absence of substantive evidence the third and fourth floors are/would be inherently unsuitable for business use.
42. I therefore conclude that the hotel use has displaced office floor space and it has not been demonstrated that this displacement is justified by exceptional circumstances, including a lack of demand for business floor space. Consequently, the loss has undermined and thus harmed the primary business role of the area and the function of the CAZ. The proposal is therefore contrary to Policies CS 13 of the CS, DM5.2 of the DMP and Policy BC8 of the FLP.

Whether an intensification of the hotel use is appropriate at the appeal site with particular reference to the hotel's location and accessibility

43. Policy DM4.11 of the DMP sets out the locations where hotel accommodation is appropriate. These are town centres and areas within the CAZ that are within the designated City Fringe Opportunity Area (CFOA) or are close to national railway hubs. The appeal site is outside a town centre and the CFOA and the Council does not consider the appeal site is in close proximity to a national railway hub.
44. The DMP gives a distance of 300m or less as a measurement of what constitutes a site being close to a national rail hub. At the hearing the Council explained that this distance was derived from Planning Policy Statement 4 (PPS4). Nevertheless, I share the appellant's doubts as to whether PPS4 stated that hotels should be within 300m of a rail station. Notwithstanding this, the 300m distance is a guide rather than a set figure as it is qualified by the term 'generally considered'.
45. The appeal site is approximately 375m – 400m from two rail stations. As such, its position does not exceed the threshold by a significant level. Additionally, the walk from the stations is level and along wide pavements. In my view the hotel is highly accessible from public transport and rail stations. The appeal site has a Public Transport Accessibility Level rating of 6A, which would support such a conclusion. As a consequence, I conclude that the hotel occupies a position in the CAZ that is in close proximity to a national railway hub. As such, the proposal is not contrary to Section A of Policy DM4.11 of the DMP.

¹⁹ The Council's Hotels In Islington 2016 study found that there is a pipeline of 1600 beds consented or under construction

Other Matters

46. At the hearing I was presented with a legal agreement pursuant to s106 of the Act²⁰. However, given my findings above it is not necessary for me to consider this further, including an assessment as to whether the obligations are consistent with Regulations 122 and 123 of the Community Infrastructure Levy Regulations 2010.
47. I have carefully considered the representations submitted by third parties who raised, amongst other things, concerns in respect of noise and disturbance. Nevertheless, I am satisfied that the additional measures submitted by the appellant, which could have been secured through a planning condition had the proposal been otherwise acceptable, would satisfactorily address the concerns raised. This is especially so when the proposal is considered in the context of the existing land users permitted in the building.
48. My attention has been drawn to a previous appeal decision²¹, which granted the use of the ground, first and second floors as a hotel. In this decision the Inspector weighed a number of factors and ultimately reached a conclusion that the hotel would provide a positive overall outcome. However, the planning policy context has moved on significantly since this decision was made with the adoption of the DMP and FLP. Furthermore, the ministerial statement dating from 23 March 2011 has been superseded and the economy has improved. As such, the Inspector's findings draw limited weight as a matter in favour of the proposal given the significant interceding changes.

Conclusion

49. I have concluded that the proposal adheres to aspects of Policy DM4.11 of the DMP as the appeal building is located close to national railway hubs. However, the proposal must be considered against the development plan as a whole and the site's accessibility to rail stations does not mitigate for the harmful impact it has on the primary business role of the CAZ. The proposal is therefore contrary to the development plan taken as a whole. Thus, it does not amount to sustainable development. Accordingly, for these reasons and the reasons given above, and having regard to all other matters raised, I conclude the appeal should be dismissed.

Graham Chamberlain
INSPECTOR

²⁰ Town and Country Planning Act 1990

²¹ APP/V5570/A/11/2149827

APPEARANCES

FOR THE APPELLANT

Richard Harwood QC	of 39 Essex Chambers
Liz Loughran	Director, Line Planning
Guy Parsons	Chief Executive, easyHotel
Paul Goodsir	Goodsir Commercial

FOR THE LOCAL PLANNING AUTHORITY

Matt Duigan	Senior Planner, London Borough of Islington
Ben Johnson	Planning Policy Advisor, London Borough of Islington
Ed Telepneff	Planning Solicitor, London Borough of Islington

DOCUMENTS

1. Travelodge London Development Brochure
2. Revised drawing lists agreed by the appellant and the Council