

Sara Chiong

From: Kenworthy, Justin [REDACTED] >
Sent: 18 September 2024 13:52
To: Local Plan
Cc: [REDACTED]
Subject: Important - Representations (THESET LTD) - Regulation 19 Consultation Draft Local Plan
Attachments: 240917 - Letter to LBNewham (Reg 19 Local Plan) - THESET.pdf
Follow Up Flag: Follow up
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Dear LBN's Policy Team,

Please find attached important representations prepared on behalf of the landowners of 190 High Street, Stratford, Newham, in respect of the Regulation 19 Consultation Draft Local Plan.

We would welcome the opportunity to discuss the attached before LBN submits the Draft Local Plan to the Secretary of State for examination in public. To enable further discussions to take place, please feel free to get in contact to arrange an MS Teams meeting at your convenience.

Kind regards

Justin Kenworthy
Planning Director

Direct: [REDACTED]
Mobile: [REDACTED]
[REDACTED]

Stantec
7 Soho Square
London W1D 3QB



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UNITED KINGDOM

17th September 2024

Our Ref: 333109592/A3/JK

Delivered by email to: LocalPlan@newham.gov.uk

London Borough of Newham
Planning Policy Team
Newham Dockside
1000 Dockside Road
London
E16 2QU

Dear Sir / Madam,

RE: DRAFT SUBMISSION LOCAL PLAN (REGULATION 19) June 2024 - REPRESENTATIONS

We write on behalf of the THESET LTD to submit representations on the contents of London Borough of Newham's (LBN) Draft Submission Local Plan (Regulation 19) June 2024 which comprise:

- Local Plan – Part 1 (Introduction, Vision and Objectives and policies);
- Local Plan – Part 2 (Neighbourhoods and Appendices); and
- Evidence base documents.

THESET LTD has an interest in 190-194 High Street, Stratford, E15 2NE (the "Site") which consists of a pair of mid-twentieth century three-storey brick-built terraced buildings with commercial uses at ground level, including an estate agent, a dental clinic and beauty salon. The surrounding area is varied, with built form being a mix of uses including commercial, residential and hotel accommodation ranging from 7 to 27-storeys in heights.

Summary

These representations demonstrate to LBN that:

- a. The Site is located in an area that is appropriate for a hotel-led, mixed-use scheme and is supported by strategic policy; and
- b. LBH has not identified enough deliverable sites to meet the needs of hoteliers and visitors to Stratford, contrary to London Plan policy.

THESET LTD therefore conclude that the Draft Submission Local Plan (Regulation 19) June 2024:

- Does not currently accord with Policy E10 of the London Plan, which is the most recently adopted development under the Section 38(3B)(5) of the Planning and Compulsory Purchase Act 2004; and
- Does not meet the 'soundness' test set out in paragraph 35 of the National Planning Policy Framework (NPPF, 2023).

THESET LTD seeks LBN's agreement to revise the draft policies discussed in these representations.

These representations set out objections to the Draft Local Plan. By not objecting to other parts of the Draft Local Plan and its evidence base does not mean that THESET LTD support or endorse these other parts.

THESET LTD would welcome the opportunity to discuss their representations before LBN publishes and submits its Draft Local Plan to the Secretary of State (SOS) for examination in public. Should you have any queries in relation to the above, please do not hesitate to contact the writer.

Yours sincerely,



JUSTIN KENWORTHY

Planning Director

STANTEC UK LIMITED

C.C.



1. Introduction to Representations

- 1.1 Set out below are the detailed representations prepared on behalf of THESET LTD.
- 1.2 These presentations are structured as follows:
 - Into the sub-headings based on the names of each document published by LBN; then
 - Underneath each sub-heading will be the representations (in support or objection to) which draw reference to the specific subject / document matter, page and paragraph; then
 - Each representation will explain why an objection (or support) is given and, if appropriate, explain how the document or policy should be revised or deleted to make it 'sound'.
- 1.3 These representations should be considered under the background context set out in Section 2.

2. Background Context

- 2.1 Hotel proposals that are located in 'opportunity areas', even if they are located outside of a town centre, are supported by Policy E10 (Visitor Infrastructure) of the London Plan (2021) which is the most up-to-date policy document in the context of Section 38(3B)(5) of the Planning and Compulsory Purchase Act 2004. LBN's emerging policy should, therefore, be consistent with London Plan policy.
- 2.2 An extract from Part G of Policy E10 is set out below:

"In outer London and those parts of inner London outside the CAZ, serviced accommodation should be promoted in town centres and within Opportunity Areas (in accordance with the sequential test as set out in Policy SD7 Town centres: development principles and Development Plan Documents) where they are well-connected by public transport, particularly to central London" [our emphasis].

- 2.3 In terms of applying Policy E10 of the London Plan, it supports hotel proposals in opportunity areas and therefore negates the need for a sequential test. This matter was specifically discussed with the Inspector responsible for testing the soundness of the London Plan on 20th March 2019 (as explained in the recording link below¹). At 5.11.15 on the recording the Inspector says, in terms of Policy E10, it gives 'equal weight to town centres and opportunity areas'. The expert witness then agrees with the Inspector, bearing in mind it was the Inspector's point. When the Greater London Authority's (GLA) barrister responds, he doesn't discuss this matter any further. This was explained to LBN in a planning advice note issued to them on 4th June 2024.
- 2.4 Stantec have recently undertaken discussions with the GLA in relation to the hotel-led, mixed-use proposals in a similar location. The GLA's formal pre-application response (see **Appendix 1**) confirms that a hotel use on the Site is supported by Policy E10 of the London Plan. An extract of this response is set out below:

"London Plan policy E10 supports the provision of hotel uses in town centres and opportunity areas, where they are well-connected by public transport, particularly to central London. This site is just outside of the Metropolitan town centre boundary but is highly accessible to public transport, and is within an Opportunity Area with close access to visitor attractions within the Queen Elizabeth Park. The hotel use in this location is appropriately located and would not raise strategic objections, therefore"

- 2.5 Stantec also followed up the GLA's response with email to the GLA containing a clarification query. The GLA confirmed by reply email (see **Appendix 2**) that a hotel-led proposal on a site located within an Opportunity Area, but outside a town centre boundary, would not need to be supported by a 'sequential test' in order to accord with the objectives of Policy E10 of the London Plan.
- 2.6 The London Plan, adopted March 2021, is the 'most up-to-date' development plan document. Section 38(3B)(5) of the Planning and Compulsory Purchase Act 2004 explains that where there is a 'conflict' between different documents in the development plan, the latest plan prevails. In this case, the London Plan E10 policy prevails over other visitor-related spatial policies previously adopted by the London Legacy Development Corporation (LLDC).

¹ <https://www.dropbox.com/scl/fi/9487ej2w0e6hxr8yxe8o/EiP-20-March-2019-4.wav?rlkey=juc983cqb6eleh5m96d4e4k4i&dl=0>

2.7 Attached is a legal opinion (see **Appendix 3**) prepared by Victoria Hutton of 39 Essex Chambers which concludes:

- I consider that it is of note that the GLA (whose policy E10 is) agrees with the interpretation of applying Policy E10. I have also been provided with an audio recording of the examination into the London Plan. It is equally of note that the Inspector examining the plan agreed that policy E10G placed Opportunity Areas and Town Centres on an equal footing;
- The London Plan, adopted March 2021, is the most recent development plan document. In this case, conflict between policy E10G of the London Plan and policy B2 of the LLDC Local Plan should be resolved in favour of policy E10G;
- It is incorrect to treat a draft allocation as having the same force, in law, as an allocation within an adopted development plan. Section 38(6) Planning and Compulsory Purchase Act 2004 ('PCPA 2004') states that decisions should be taken in accordance with the development plan unless material considerations indicate otherwise;
- It is therefore clear to me that LBN cannot ignore evidence that the site allocation is not viably deliverable. This is an issue which goes to soundness and viability and deliverability is an issue which the Planning Inspectorate's (PINS) guidance explicitly states should be paid careful attention to; and
- I would expect that LBN will want to consider the potential impact of continuing to pursue a local plan which significantly over-provides for housing when considered against the Government's latest housing need figures. This is likely to include the viability of delivering so much housing and whether, in practice, it will be difficult to defend many of the housing allocations if they are, in fact, not required to meet housing needs.

2.8 The representations set out in Sections 3 and 4 below should be considered under the above context. This context will be referred to as the '**background context**' when relevant, rather than re-writing this context for each representation.

3. Draft Local Plan (Part 1) - Representations

A Page 70 – Policy D4: Tall Buildings

Objection:

- Contrary to the objectives of paragraph 3.9.3 of the London Plan
- Contrary to paragraph 35 (a) – not justified – of the NPPF

Amendments required: Yes, as suggested below.

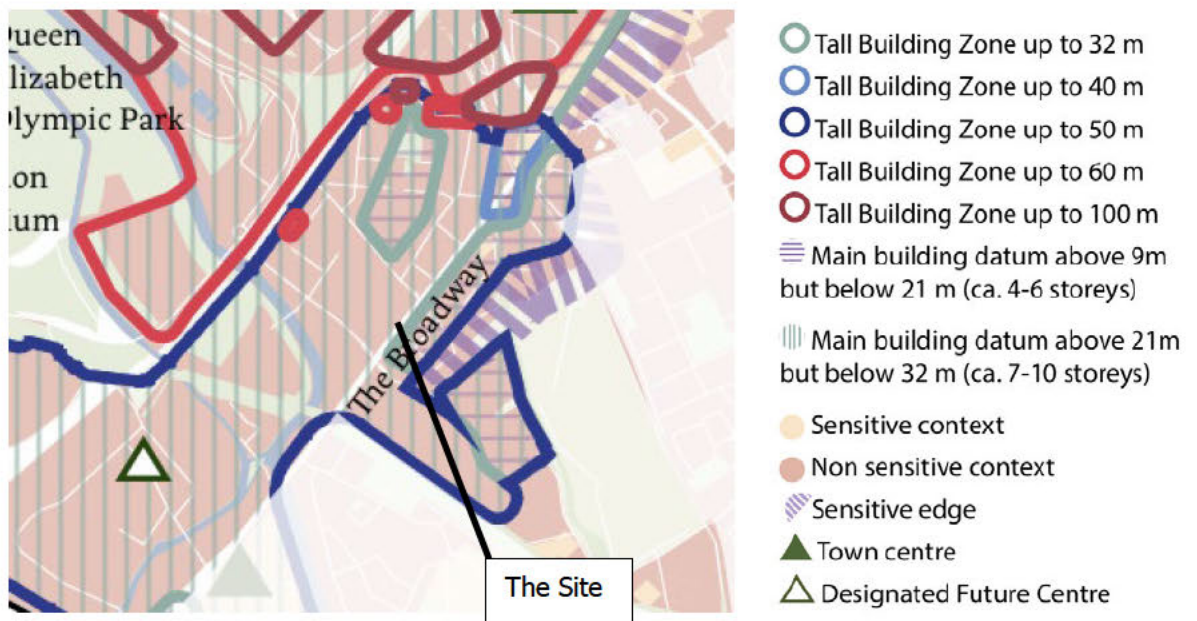
3.1 Paragraph 3.9.3 of the London Plan explains as follows:

3.9.3 Tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline. Boroughs should define what is a 'tall building' for specific localities, however this definition should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. This does not mean that all buildings up to

3.2 This text recognises that tall buildings are:

- Substantially taller than their surroundings; and
- There will be different building heights in different localities which would adjust the definition of a 'tall building' in each broad location [rather than using a borough-wide application].

3.3 However, Part 1 of Policy D4 defines a tall building across Newham as those at or over 21m, measured from the ground to the top of the highest storey of the building (excluding parapets, roof plants, equipment or other elements). THESET Ltd is aware that page 220 of Newham's Characterisation Study 2024 identifies the 190-194 High Street site within an area where the main datum of building height is already above 21m. This is identified in the extract below:



- 3.4 As such, any proposal for a new building(s) on the northside the High Street in Stratford (The Broadway) which is above 22m will automatically fall into the definition of a 'tall building' even if it is lower in height to neighbouring buildings. In this scenario, the new proposal would not be regarded to be substantially taller than its surroundings, as defined by the London Plan.
- 3.5 In light of the context, THESET LTD conclude that part 1 of Policy D4, as set out on page 70 of the Draft Submission Local Plan (Regulation 19) June 2024:
- Does not accord with 3.9.3 of the London Plan; nor
 - Does not meet the 'justified' test set out in paragraph 35 of the NPPF.

THESET LTD's Suggested Amendments:

- 3.6 THESET LTD seeks LBN's agreement to revise draft Policy D4 by
- 3.7 "1. *Outside of tall buildings zones*, tall buildings in Newham are *normally* defined as those that are at or over 21, measured from the ground to the top of the highest storey of the building (excluding parapets, roof plants, equipment or other elements). *In tall building zones, tall buildings are defined as those that are substantially taller than the prevailing heights identified under the heading of 'further guidance' in Table 1 below.*"

B Pages 149 to 151 – Policy HS8 (Visitor accommodation)

Objection:

- **Contrary to the objectives of Policy E10 and paragraph 6.10.02 of the London Plan**
- **Contrary to paragraph 35 (a) – positively prepared – of the NPPF**

Amendments required: Yes, as suggested below.

- 3.8 Please refer to the Background Context in Section 2 above, particular in relation to the fact that Policy E10 supports hotel proposals in opportunity areas and therefore negates the need for a sequential test.
- 3.9 In addition, the THESET LTD are aware that:
- Paragraph 6.10.2 of the London Plan highlights:
 - The importance of tourism to London's economy and that London needs to ensure that it is able to meet the accommodation demands of tourists who want to visit the capital; and
 - It is estimated that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, which is an average of 2,230 bedrooms per annum.
 - Policy E10 of the London Plan seeks to strengthen London's visitor economy and associated employment by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure, particularly to parts of outer London well-connected by public transport, taking into account the needs of business as well as leisure visitors.

- 3.10 THESET LTD have concluded that LBN has failed to consider the needs of hoteliers and visitors and has not therefore adequately planned for its needs in the draft Local Plan and its evidence base, as required by Policy E10 and paragraph 6.10.2 of the London Plan.
- 3.11 The hotel demand assessment found in **Appendix 4** demonstrates that there is a high-level of demand in the High Street, Stratford area. By allowing more hotel development in this area, this will help to support the other town centre uses and will attract more visitors to London and the adjacent Stratford Metropolitan Town Centre.
- 3.12 In light of the above, THESET LTD conclude that draft Policy HS8 (Visitor accommodation) of the Draft Submission Local Plan (Regulation 19) June 2024:
- Does not currently accord with Policy E10 and paragraph 6.10.2 of the London Plan; and
 - Does not currently accord meet the 'positively prepared' test set out in paragraph 35 of the NPPF.

THESET LTD's Suggested Amendments:

- 3.13 THESET LTD seeks LBN's agreement to revise draft Policy HS8 by adding a new bullet point, as follows, to ensure it is consistent with Policy E10 of the London Plan and to meet the needs of hoteliers and visitors in this location:

"Hotels and other forms of visitor accommodation will be supported in:

a. Town and Local Centres outside of the Primary Shopping Area, and principally within centres in Stratford and Maryland Neighbourhood as a key tourist destination; ~~and~~ or

b. Parts of Opportunity Areas where they are well-connected by public transport; or

~~b.c.~~ Areas within 15 minutes walking distance to the Excel conference centre".

4 Draft Local Plan (Part 2) - Representations

C Pages 468 to 470 – N8 Stratford and Maryland (Vision)

Objection:

- Contrary to the objectives of Policy E10 and paragraph 6.10.02 of the London Plan
- Contrary to paragraph 35 (a) – positively prepared – of the NPPF

Amendments required: Yes, as suggested below.

- 4.1 Please refer to the background context in Section 2 above.
- 4.2 In light of the context, THESET LTD conclude that draft 'Vision' for the Stratford and Maryland area, as set out on pages 468 to 470 of the Draft Submission Local Plan (Regulation 19) June 2024:
- Does not accord with Policy E10 of the London Plan; nor
 - Does not meet the 'positively prepared' test set out in paragraph 35 of the NPPF.

THESET LTD's Suggested Amendments:

- 4.3 THESET LTD seeks LBN's agreement to revise draft Vision by adding a new bullet point, as follows, to ensure it is consistent with Policy E10 of the London Plan:

"The vision for Stratford and Maryland will be achieved by:

15. supporting hotel development within centres in Stratford and Maryland Neighbourhood as a key tourist destination or parts of Opportunity Areas where they are well-connected by public transport.

5 Evidence Base Documents - Representations

5.1 There are several evidence base documents to be considered. Set out below are THESET's comment on one of these documents.

a) **Newham's Characterisation Study 2024**

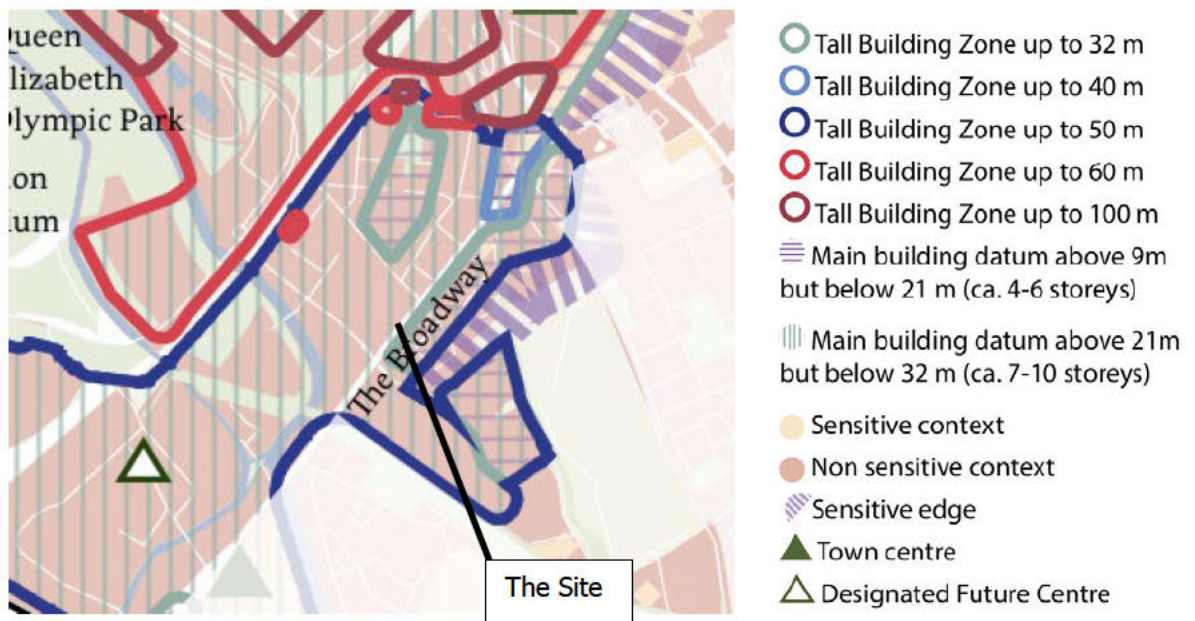
Chapter 8, Page 220, Tall Buildings Illustration

Support

- **Contrary to paragraph 35 (c) – effective – of the NPPF**

Amendments required: Yes, as suggested below.

4.4 THESET Ltd is aware that page 220 of Newham's Characterisation Study 2024 identifies the 190-194 High Street site within a tall building zone (up to 50m). This is identified in the extract below:



4.5 This Site's inclusion in the 50m tall building zone is supported by THESET Ltd.

Appendix 1

Buzz Bingo Hall, Stratford

in the London Borough of Newham

The proposal

Redevelopment of existing site to deliver a mixed-use development comprising hotel, co-living, market sale and affordable homes, workspace, community space and associated landscape and car parking/servicing arrangements.

The applicant

The applicant is **Forward Trustees Limited** and the agent is **Stantec**

On 23 July 2024 a pre-application "in principle" meeting was held online to discuss the above proposals with the following attendees:

Meeting attendees

GLA

- [REDACTED], Head of Development Management
- [REDACTED], Team Leader (East) – Development Management

Applicant team

- [REDACTED] - Assael
- [REDACTED] – Assael
- [REDACTED] – QSquared
- [REDACTED] – Applicant
- [REDACTED] – DS2
- Justin Kenworthy - Stantec

Summary of meeting discussions

1 The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Scheme overview:

2 The application site comprises a two storey building in use as a bingo hall, with associated car park, on the southern side of Stratford High Street between Cam Road and Burford Road. Stratford High Street DLR station is adjacent to the north. The site is currently within the administrative boundaries of the London Legacy Development

Corporation (LLDC), which will soon transfer responsibility back to the London Borough of Newham.

3 The site is within the Olympic Legacy Opportunity Area, and lies just outside the boundary of Stratford town centre (a metropolitan town centre), which is approximately 75m to the north east. This also marks the boundary of the Stratford St Johns Conservation Area which runs along the high street to the north. Due to the highly accessible nature of the site which is served by several frequent bus routes and access to the DLR, with underground and national rail services at Stratford, the site records the highest PTAL of 6b.

4 No strategic planning history exists on the site. It is not currently allocated, although the draft Newham Local Plan (Regulation 19) allocates it for residential led mixed-use development with light industrial employment use, in buildings up to 13 storeys.

5 The current proposals are to redevelop the site to provide hotel and serviced apartments (Class C1), co-living (sui generis) and market and affordable housing (Class C3), and workspace/light industrial space, within buildings up to 16 storeys.

Key comments and considerations

Land use principles

6 The site is in use as a bingo hall and car park. The redevelopment of a low-density brownfield site within an Opportunity Area to make optimal use of land is supported in principle by Good Growth Objective 2 and Policy SD1 of the London Plan. The principle of redevelopment is also supported by Newham Council's draft site allocation N8.SA4, although the draft site allocation envisages redevelopment for residential and employment use, rather than being led by hotel use.

Hotel use

7 London Plan policy E10 supports the provision of hotel uses in town centres and opportunity areas, where they are well-connected by public transport, particularly to central London. This site is just outside of the Metropolitan town centre boundary but is highly accessible to public transport, and is within an Opportunity Area with close access to visitor attractions within the Queen Elizabeth Park. The hotel use in this location is appropriately located and would not raise strategic objections, therefore. However, noting the Council's draft site allocation requirements and desire for this site to provide a contribution to much-needed housing and affordable housing, it should be demonstrated why this site could not provide a greater amount of Class C3 residential accommodation. The applicant explained viability constraints including the high existing use value of the bingo hall, which should be further explained and quantified. It is noted that the submitted documentation explains that the existing bingo hall is underused and no longer viable given the rise of online bingo, so this would need to be factored in to any assessment of the existing use value.

8 A mixture of hotel rooms and serviced apartments would be provided. It should be demonstrated how the Class C1 accommodation, especially the serviced apartment use, is distinct in nature and operation from the proposed co-living accommodation, as

the two uses have different requirements in terms of the size and space standards, and the need for an affordable housing contribution. Maximum stay lengths of up to 90 days would be expected to be secured, for instance, to confirm the use as a hotel.

Workspace

9 The provision of workspace is supported as a means of providing activity at ground level. There is no strategic requirement for this site to provide light industrial uses, but Newham's draft site allocation specifies this. The provision of light industrial uses would be supported in line with these requirements, and to provide employment opportunities for small businesses. The workspace should be designed and fitted to occupier requirements to ensure that fit-for-purpose and lettable space is provided.

Co-living

10 London Plan Policy H16 states that proposals for large scale purpose built shared living (LSPBSL/co-living) must be located within areas that are well connected to local services by active travel means. This site is highly accessible and can therefore be supported as a location for co-living development under Policy H16. Any proposals should respond to the requirements of the policy and the benchmarks and guidance set out in the LSPBSL LPG, particularly in terms of its design, management arrangements, size and amenities of private rooms, and the quantum and convenience of shared amenity spaces.

11 Whilst Policy H16 expects a payment in lieu contribution towards affordable housing, the principle of providing the required affordable housing contribution on-site, as Class C3 affordable housing, is accepted and supported. It is strongly encouraged that the threshold level of affordable housing is provided, which is 35% in this case. As set out within the draft Affordable Housing LPG, the percentage of affordable housing from co-living is calculated on a floorspace basis (rather than counting co-living units as one habitable room).

Housing and affordable housing

12 A mixture of market and affordable homes are currently proposed within the Class C3 element of the proposals (52 units). As such, the level of affordable housing is currently unlikely to meet the threshold level of affordable housing required from the combination of the c.200 unit co-living element and the market housing element, and the overall percentage contribution is likely to be very small. The applicant is strongly encouraged to engage early with a Registered Provider to gauge interest in the accommodation, their requirements in terms of quantum and tenure, and their access to grant funding to increase the affordable housing level. Consideration should be given to providing all of the C3 accommodation as affordable, which can have a positive impact on viability by de-risking this element of the scheme.

13 The tenure of the C3 affordable housing is expected to comply with Newham Council's strategic tenure split target (noting the Council's emerging strategic target of 60% affordable housing including 50% social rent and 10% affordable ownership).

14 If the scheme cannot follow the threshold approach, then early engagement with the GLA's viability team is strongly advised in a further pre-application meeting, to discuss the inputs and assumptions for the viability assessment.

Design considerations

15 Whilst detailed design matters were not discussed at this pre-application in principle meeting, key initial points are set out below.

Tall buildings

16 The site is not identified as suitable for tall buildings in an adopted development plan document. Proposals for tall buildings on this site would not therefore currently comply with the locational requirements of London Plan Policy D9 (Part B). Newham Council's draft site allocation N8.SA4 identifies the site as suitable for taller buildings up to a maximum height of 13 storeys, which the current proposal would exceed.

17 The acceptability of the building height and design would also depend on assessment against the qualitative criteria outlined in London Plan Policy D9, Part C (including its visual, functional, environmental and cumulative impacts), and local policy. In this respect, it is noted that this part of Stratford High Street contains a number of tall and very tall buildings, and in terms of its visual and cumulative impact, a building of the proposed height could sit comfortably within its context. The stepping down of massing to address sensitive heritage context is supported, although the localised impact of the 10 and 13 storey buildings fronting on to Burford Road would need to be tested further.

Layout and public realm

18 The replacement of the existing poorly activated building and surface level car park with a building which fully addresses each street frontage is supported in principle. The location of building services beneath a podium level creates greater opportunity for active frontages, which is supported. The opportunity to make improvements to the public realm outside of the red line boundary (e.g. resurfacing, improved crossings, planting, wayfinding etc) should be fully explored.

19 The proposed residential entrance is set into the site rather than being accessed from a street frontage, and is accessed through a parking and vehicle servicing area. It should be ensured that the residential entrance is safe and legible, and that a segregated route is provided so that pedestrians do not come into conflict with vehicles.

20 Regarding internal building layouts, the co-living elements and Class C3 residential accommodation would need to take into account relevant policy and guidance regarding internal layouts, space standards and access to external amenity space. The C3 housing will also produce a requirement for child playspace, with at least doorstep play for under 5s required onsite. If any required playspace is proposed to be located off-site, it must be shown that the playspace exists at a suitable walking distance (with safe travel routes), and should make financial contributions towards improvements to the playspace and/or the travel routes as required.

Other considerations

21 As a referable scheme, the application must be accompanied by a Circular Economy statement and a Whole Life Carbon assessment, and should respond to the energy and sustainability policies within the London Plan, including the minimising and reporting of carbon emissions, connecting to district heat networks where available, or connection to communal heat networks serving the whole development in line with the GLA's hierarchy, and incorporation of low carbon and renewable energy technology.

22 A car free development (with blue badge parking) is strongly supported. Detailed transport discussions with TfL will be required, particularly around Healthy Streets/ active travel, improvements to local connectivity including potential connections to Channelsea Path, vehicle access and servicing, any public transport mitigation, and cycling. Given the proximity to DLR line and Jubilee line applicant may also need to seek advice from TfL Infrastructure Protection for any significant construction works.

23 TfL also advises that it is working in partnership with Newham Council to develop and model numerous bus priority interventions along Stratford High Street. The A118 Stratford High Street Future Bus corridor runs from the junction of Stratford High Street / A12 Blackwall Tunnel Northern Approach to the junction of Stratford High Street / Great Eastern Road. The corridor forms part of the Strategic Road Network (SRN) within the London Borough of Newham and is approximately 1.5km in length. As the site is adjacent to this corridor, the proposed development should be aligned with emerging corridor work to improve the public realm and opportunities for any works in kind or contributions to further feasibility work and delivery.

Conclusion

24 The principle of redevelopment to optimise the use of this well-connected brownfield site is supported. While there would be no strategic objections to the location of a hotel in this location, in view of the draft site allocation requirements for residential use, and the pressing need for homes, it should be demonstrated why this site could not viably provide more housing. The provision of co-living accommodation and an element of market and affordable housing is supported in principle, but the proposals should make its fullest contribution towards affordable housing, with the threshold level being the target. Proposals that do not meet this level will be rigorously tested by GLA officers. The proposed 16 storey building would not comply with the locational requirements for tall buildings as set out in the London Plan, however initial indications are that the tallest building proposed could have acceptable visual and cumulative impacts. Further consideration may need to be given to greater stepping down to address the lower rise and heritage context towards the rear of the site.

24 The applicant is advised that this is in-principle advice only. A full pre-application meeting with the GLA will be necessary to fully discuss land use, viability, design (scale, massing, layout, public realm and playspace), heritage, energy and sustainability matters, and transport.

Appendix 2

From: [REDACTED]
To: [Kenworthy, Justin](#)
Cc: [REDACTED]
Subject: RE: Buzz Bingo, Stratford - Comments on the GLA's Pre-App Response Letter
Date: 16 August 2024 15:15:43

Hi Justin,

Sorry for the delay in response whilst I was on leave.

Policy E10 states that outside of CAZ, hotels will be supported in town centres and in opportunity areas, where well connected by public transport. The policy references Policy SD7, which requires a town-centre-first approach for town centre uses, and seeks to apply a sequential test for proposals outside of town centres. In this case, the site is just outside the boundary of the town centre. Whilst it is not technically within the town centre, given the very close proximity to a Metropolitan town centre, and the fact that the site complies with the locational requirements of Policy E10 by being within an Opportunity Area, with the highest level of public transport accessibility, and also given that the proposal is for a hotel use rather than (for instance) a large scale edge-of-centre retail use, it is not considered that a sequential test would be required under the London Plan.

Local Plan policy requirements are also relevant, of course. The potential conflict between the proposed land uses and the draft site allocation has been highlighted, and would need to be resolved using suitable evidence, and as advised by the borough.

I hope this is of assistance.

Kind regards,

[REDACTED]

[REDACTED]

Team Leader (East), Development Management

GREATER LONDON AUTHORITY

Union Street, London, SE1 0LL

www.london.gov.uk/what-we-do/planning

[REDACTED]

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From: Kenworthy, Justin [REDACTED]
Sent: Wednesday, August 14, 2024 3:00 PM
To: [REDACTED]

Cc: [REDACTED]

Subject: RE: Buzz Bingo, Stratford - Comments on the GLA's Pre-App Response Letter

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Hi [REDACTED],

Further to my email of 2nd August in relation to the above site and in respect of the GLA's Pre-Application Response Letter.

We about to undertake further pre-application discussions with LB Newham and think it would be helpful if you could kindly confirm, via return email, that a sequential test is not required by Policy E10 of the London Plan to support our client's hotel proposals, as the principle of a hotel is considered to be acceptable in this location?

We look forward to hearing from you and undertaking continuing pre-application discussions with the GLA team in due course.

Kind regards,

Justin Kenworthy

Planning Director

Direct: [REDACTED]

Mobile: [REDACTED]

Stantec
7 Soho Square
London W1D 3QB



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From: Kenworthy, Justin

Sent: Friday, August 2, 2024 2:49 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: Buzz Bingo, Stratford - Comments on the GLA's Pre-App Response Letter

Hi [REDACTED]

We are now in receipt of the GLA's Pre-Application Response Letter in relation to the above site. Thank you so much for preparing this positive response.

It is great to see that the GLA recognises the benefits of our client's hotel, residential (including affordable homes), co-living, workspace and community use proposals in this opportunity area and in the context of supporting the adjacent Metropolitan Town Centre.

We have two quick comments that are connected to your response:

1. Unless otherwise advised, we assume that a sequential test is not required to support our client's proposals, as the principle of a hotel is considered to be acceptable in this location and otherwise you would have mentioned this in your response; and
2. In terms of the existing use value, it was mentioned at our meeting that our client had received a new significant offer from the Bingo operator. This will be 'evidenced' and factored into the financial viability assessment. However, in view of the possibility of optimising this PDL site to deliver planning benefits, this offer will not be taken up at this stage but remains a legitimate 'fall-back' option. Notwithstanding this, we are aware of the GLA's target of seeking to deliver the maximum amount of affordable housing on site.

We look forward to undertaking continuing pre-application discussions with the GLA team in due course.

Kind regards,

Justin Kenworthy

Planning Director

Direct:

Mobile:

Stantec

7 Soho Square

London W1D 3QB



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Appendix 3

OPINION

INTRODUCTION

1. I am instructed by Stantec UK Ltd on behalf of Forward Group Trustees (**‘the Client’**) to give an opinion on a number of questions largely relating to a proposed draft allocation at Buzz Bingo Hall 341-351 High Street, Stratford (**‘the Site’**).

BRIEF FACTUAL BACKGROUND

2. The Site is situated within the London Legacy Opportunity Area where the London Legacy Development Corporation (**‘LLDC’**) is currently the local planning authority. However, the LLDC is in the process of handing back its planning powers to London Borough of Newham (**‘LBN’**) who will start receiving legacy planning applications from October 2024. Thus, at the point of deciding a planning application for the site, the LBN will be the local planning authority (**‘LPA’**).
3. Until LBN has adopted a new plan (the process for which is ongoing) LLDC’s Local Plan policies will, alongside the London Plan, form the Development Plan for the purposes of s38(6) Planning and Compulsory Purchase Act 2004 (**‘PCPA 2004’**).
4. The Client owns the Site and wishes to develop it for mixed use purposes. It has been discussing proposals with the London Borough of Newham (**‘LBN’**).
5. LBN consulted on its Regulation 18 Draft Local Plan in December 2022. That draft set out the following allocation for the Site:

“Residential development with employment and industrial floorspace. The employment and industrial floorspace should provide space for light industrial uses and business workspaces and complement the offer at Stratford Workshops on Burford Road”.

6. I understand that those instructing me have had pre-application discussions with LBN for mixed-use proposals at the Site including hotel, build to rent (**‘BTR’**), co-living uses, conventional residential, workspace and community floorspace. LBN has not been supportive of the inclusion of hotel floorspace on the Site. Page 3 of LBN’s pre-application response (July 2023) states:

“... there is no intention to support Hotel uses on this site. Current and emerging policy seeks to concentrate these uses in the Town Centre boundaries rather than encouraging spread further down the high street. They [LBN’s Policy Team] note that several hotels already exist along this area of the high street and there is no desire to further encourage a concentration of such uses in this location.

In the meeting it was discussed that the hotel use would enable a higher level of affordable housing that [is] otherwise possible. Whilst this is acknowledged, the policy position remains that Hotel use is not supported on this site and you are strongly encouraged to consider other options in line with the site allocation ...”

7. A follow-up pre-application meeting was held with LBN on 27th February 2024. I understand that LBN’s officers continued to question the appropriateness of a hotel use on the site, because it would be beyond the town centre boundary and would need to be supported by a sequential assessment. LBN has maintained this position in subsequent correspondence.
8. In June 2024 LBN published its regulation 19 local plan. Pages 484-5 of that draft detail that the Council continues to expect that the form of development on the site is ‘Residential development with employment and industrial floorspace’. I am instructed that such a scheme could not be viably provided at the Site.
9. The Client undertook pre-application discussions with the Greater London Authority (**‘GLA’**) on 23 July 2024. In those discussions the GLA agreed that policy E10 of the London Plan supports hotel use on the Site as it is within an opportunity area and there is no need for a sequential test.

10. I am informed that the Client is now preparing representations in relation to the Regulation 19 draft Local Plan (consultation closes on 20 September 2024) and I understand that the Client also intends to continue with pre-application discussions with LBN in relation to its mixed-use proposal.

11. In light of that factual background, I am asked for my opinion on the following questions:

- a. What is the proper interpretation of London Plan policy E10G, namely in relation to whether Policy E10G supports the principle of hotel accommodation in Opportunity Areas (to the same extent as Town Centres) and also whether a Sequential Test is required for a hotel within an Opportunity Area?
- b. If there is a conflict between London Plan policy E10G and other development plan policies, which should prevail?
- c. LBN appears to be treating the draft allocation at the Site as an allocation and requiring any scheme to accord with it, is that the correct approach in law?
- d. LBN's obligation under paragraph 35 of the NPPF (tests of soundness) is to ensure that the plan must be effective, which includes that it is deliverable over the plan period. Can LBN ignore evidence presented to it that demonstrates that the site allocation is not viably deliverable?
- e. The relevance of the draft NPPF and the likely change in Newham's housing targets and how the Council should consider this in relation to the draft Site Allocation and emerging Local Plan?

12. Before going on to address each question in turn, I set out the policy context for the Site.

POLICY CONTEXT

Adopted policies relating to hotel use at the Site

13. Part G of London Plan policy E10 states:

‘In outer London and those parts of inner London outside the CAZ, serviced accommodation should be promoted in town centres and within Opportunity Areas (in accordance with the sequential test as set out in Policy SD7 Town centres: development principles and Development Plan Documents) where they are well-connected by public transport, particularly to central London.’

14. London Plan policy SD7 states (at parts A and B):

A. When considering development proposals, boroughs should take a town centres first approach, discouraging out-of-centre development of main town centre uses in accordance with Parts A1 - A3, with limited exceptions for existing viable office locations in outer London (see Policy E1 Offices). Boroughs should:

1) apply the sequential test to applications for main town centre uses, requiring them to be located in town centres. If no suitable town centre sites are available or expected to become available within a reasonable period, consideration should be given to sites on the edge-of-centres that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport. Out-of-centre sites should only be considered if it is demonstrated that no suitable sites are (or are expected to become) available within town centre or edge of centre locations. Applications that fail the sequential test should be refused

2) require an impact assessment on proposals for new, or extensions to existing, edge or out-of-centre development for retail, leisure and office uses that are not in accordance with the Development Plan. Applications that are likely to have a significant adverse impact should be refused

...

B Boroughs should support the town centres first approach in their Development Plans by:

1) assessing the need for main town centre uses, taking into account capacity and forecast future need

2) allocating sites to accommodate identified need within town centres, considering site suitability, availability and viability, with limited exceptions for existing viable office

locations in outer London (see Policy E1 Offices). If suitable and viable town centre sites are not available, boroughs should allocate appropriate edge-of-centre sites that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport

3) reviewing town centre boundaries where necessary

4) setting out policies, boundaries and site allocations for future potential town centres to accommodate identified deficiencies in capacity (having regard to Policy SD8 Town centre network and the future potential town centre classifications in Annex 1).

15. Policy B2 for the LLDC Local Plan states:

‘Main town centre uses shall be focused according to the scale, format and position in the retail hierarchy identified in Table 4. In addition to the comparison floorspace requirements, Centres should contribute towards the identified need for convenience floorspace phased by 2036. The identified function for each Centre will be protected by:

...

3. The sequential assessment of sites for main town centre uses and subject to paragraph (1) of this policy, providing support for existing and proposed cultural and night time economy uses

...

5. Allowing edge-of-centre development supporting cultural, sporting and visitor growth associated at the Metropolitan Centre, subject to (3) above, and

6. Promoting complementary residential development in all Centres to optimise housing delivery.

NPPF

16. Paragraph 89 of the NPPF states:

‘Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.’

17. The glossary to the NPPF makes clear that main town centre uses include hotels.

18. The draft allocation for the Site (ref N8.SA4) provides for:

‘Residential development with employment and industrial floorspace. The employment and industrial floorspace should provide space for light industrial uses and business workspaces and complement the offer at Stratford Workshops on Burford Road.’

19. Draft policy HS8 states:

‘1. Hotels and other forms of visitor accommodation will be supported on sites in:

a. Town and local centres where the function of the primary shopping area is protected in line with Local Plan Policy HS2, and principally within centres in Stratford and Maryland Neighbourhood as a key tourist destination; and

b. Areas within 15 minutes walking distance to the ExCel conference centre.

2. The scale of development should be proportionate to the scale of the centre and/or the tourism or employment function of the area it services, as relevant to the site, justified by market demand testing and a Sequential Test if proposed in an out of centre location. The development should be supported by a Visitor Accommodation Management Plan outlining:

a. How amenity and safety will be managed and maintained through the day and at night.

b. A servicing plan.’

20. The explanatory text includes the following:

‘3.113 The ‘Building Newham’s Creative Future’ Cultural Strategy (2022) seeks to put Newham on the map and promote it as a visitor destination, with a growing visitor economy and encourage footfall from beyond the borough boundaries. It recognises the importance of well-known anchor institutions that can unlock an area by attracting visitors who may spend their time exploring the borough, as well as encouraging inward investment into revitalizing cultural infrastructure in nearby areas. Such institutions are increasingly establishing themselves in Newham as part of ongoing regeneration activity. These include large education, culture and leisure institutions in Stratford, and conference facilities at Royal Victoria Dock. Improving the availability and accessibility of visitor accommodation in line with the London Plan (2021) will support Newham’s developing visitor economy. More broadly, the Council will continue to support Newham’s economic growth and develop the tourism and leisure offer, cultural uses, and the evening/nighttime economy, and generally develop and improve

the business environment of town centres. Visitor accommodation will be an important part of the local offer to support the diversification of town centres.

3.114 However, the delivery of visitor accommodation must be balanced against need for other forms of development, not least housing. The London Plan (2021) estimates that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, delivered primarily within the Central Activity Zones, but also increasingly in town centres more broadly. The study allocates a share of the need to Newham equating to 5.2 per cent or 3,031 net rooms. Latest monitoring indicates that 1,373 rooms have already been delivered, with a further 483 in the pipeline as of 2021/22. The policy therefore requires market demand testing to ensure there is not an over delivery of visitor accommodation and land is protected for other priority uses.’

21. The draft NLP currently includes delivery targets for housing of: 2,974pa in the short term, 3,836pa in the medium term and 3,475pa in the long term (p208).
22. As stated above, a regulation 19 consultation on the draft plan is ongoing.

Draft NPPF

23. The new government published a draft NPPF for consultation on 30 July 2024. This includes a new method for calculating housing needs. A spreadsheet published with the consultation draft shows a drop in housing numbers by c45% (from 4188pa to 2178pa).

OPINION

What is the proper interpretation of London Plan policy E10G, namely in relation to whether Policy E10G supports the principle of hotel accommodation in Opportunity Areas (to the same extent as Town Centres) and also whether a Sequential Test is required for a hotel within an Opportunity Area?

And

If there is conflict between London Plan policy E10G and other development plan policies, which should prevail?

24. I start with the proper interpretation of policy E10G. There are two competing interpretations of policy E10G. The first, held by the Client and the GLA is that policy E10G supports hotel use within Opportunity Areas without the conduct of a sequential test. The second

interpretation, held by LBN, is that the policy requires a sequential test even where the Site is within an Opportunity Area.

25. It is useful to re-state the wording of policy E10G:

‘In outer London and those parts of inner London outside the CAZ, serviced accommodation should be promoted in town centres and within Opportunity Areas (in accordance with the sequential test as set out in Policy SD7 Town centres: development principles and Development Plan Documents) where they are well-connected by public transport, particularly to central London.’

26. I note that policy E10G relates solely to serviced accommodation as opposed to all main town centre uses which are addressed by policy SD7.

27. Planning policies are to be interpreted objectively in accordance with the language used (*Tesco Stores v Dundee CC* [2012] UKSC 13).

28. Supporting/explanatory text is relevant to the interpretation of a policy, though it does not form part of the policy (see *R(oao Cherklely Campaign Ltd) v Mole Valley District Council* [2013] EWHC 2582 (Admin)).

29. At paragraph 6.10.3 the explanatory text to policy E10 states:

‘**Boroughs in the CAZ** are encouraged to direct strategically-significant serviced accommodation (defined as more than 20,000 sq.m. in the CAZ) towards the CAZ Opportunity Areas. Concentrations of serviced accommodation within parts of the CAZ that might constrain other important strategic activities and land uses (for example offices and other commercial, cultural and leisure uses) or erode the mixed-use character of an area should be avoided. **Boroughs in outer and inner London beyond the CAZ** are encouraged to plan proactively for new serviced accommodation in town centres to help spread the benefits of tourism to the whole of the capital.’

30. In my view the explanatory text is not terribly helpful as to ascertaining the true interpretation of the policy and, in particular, on the issue of the phrase ‘and within Opportunity Areas’ in the second line. The explanatory text does not address that text.

31. In my opinion, whilst I consider that the argument made by LBN as to the interpretation of E10 is arguable, the interpretation of the Client and the GLA is to be preferred. LBN relies upon the bracketed text in policy E10G as having the effect that policy E10G is subject to the requirements of policy SD7. Policy SD7 requires a sequential test for applications for main town centre uses where they are outside of town centres.
32. In my view, the problem with LBN's interpretation is that it renders the phrase 'and within Opportunity Areas' redundant. I consider that an objective interpretation of the text is that serviced accommodation is to be promoted (i.e. positively encouraged) within Opportunity Areas where they are well-connected by public transport. Opportunity Areas are not co-incident with town centres. The promotion of serviced accommodation in Opportunity Areas is to be understood, in my view, as an exception to the positive discouragement which London Plan policy SD7 gives for main town centre uses out-of-centre (requiring a sequential test to be undertaken for such uses). If policy E10G is to be read as requiring a sequential test for all out-of-centre serviced accommodation applications then there would have been no need to include the statement 'and within Opportunity Areas'.
33. Further I note that the bracketed text: 'in accordance with the sequential test....' does not state that policy E10G is 'subject to' policy SD7. I consider a credible interpretation of that text is that the sequential test set out in policy SD7 must be complied with where the development proposal is not either within a town centre and well connected by public transport and/or within an Opportunity Area and well connected by public transport. Such an interpretation would mean that the phrase 'and within Opportunity Areas' is not redundant and would enable policies E10G and SD7 to sit together.
34. Although the proper interpretation of policy is a matter for the court. I consider that it is of note that the GLA (whose policy E10 is) agrees with the Client's interpretation. I have also been provided with an audio recording of the examination into the London Plan. It is equally of note that the Inspector examining the plan agreed that policy E10G placed Opportunity Areas and Town Centres on an equal footing.

35. The Local Plan is made up of the London Plan as well as the LLDC Local Plan. The LLDC Local Plan requires a sequential assessment to be conducted for main town centre uses outside of the town centre. As such, there appears to be a conflict between London Plan E10G and LLDC policy B2. Section 38(5) of the Planning and Compulsory Purchase Act 2004 explains that where there is a ‘conflict’ between different documents in the development plan, the latest plan prevails. The London Plan, adopted March 2021, is the most recent development plan document. In this case, conflict between policy E10G of the London Plan and policy B2 of the LLDC Local Plan should be resolved in favour of policy E10G.

LBN appears to be treating the draft allocation at the Site as an allocation and requiring any scheme to accord with it, is that the correct approach in law?

36. The short answer is that it is incorrect to treat a draft allocation as having the same force, in law, as an allocation within an adopted development plan. Section 38(6) Planning and Compulsory Purchase Act 2004 (**‘PCPA 2004’**) states that decisions should be taken in accordance with the development plan unless material considerations indicate otherwise. In short, the development plan has statutory status and a decision maker must follow it unless material considerations indicate that it should not be followed (see *City of Edinburgh Council v Secretary of State for Scotland* [1997] 1 WLR 1447).

37. The National Planning Policy Framework (‘NPPF’) is a material consideration in planning decisions. With regards to draft policy it states:

‘48. Local planning authorities may give weight to relevant policies in emerging plans according to:

- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).’

38. Thus, following national policy, when attributing weight to a draft allocation LBN should take into account the fact that the draft plan is at Regulation 19 stage (i.e. not yet submitted for examination) and also whether there are unresolved objections to that allocation.

LBN's obligation under paragraph 35 of the NPPF (tests of soundness) is to ensure that the plan must be effective, which includes that it is deliverable over the plan period. Can LBN ignore evidence presented to it that demonstrates that the site allocation is not viably deliverable?

39. Paragraph 35 of the NPPF sets out the tests of soundness against which plans are to be examined. It states:

‘Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

40. Whether or not a particular type of development can viably be delivered (i.e. whether it will actually come forward during a plan period) is, in my opinion, highly relevant to all four tests, namely: (a) whether the plan is ‘positively prepared’, i.e. will it actually meet needs, (b) whether it is an appropriate strategy and therefore ‘justified’, (c) whether it is ‘effective’, i.e. deliverable over the plan period, and (d) whether the plan is ‘consistent with national policy’ i.e. whether it will enable the delivery of sustainable development.

41. Section 20(2) of the PCPA 2004 states that a local planning authority must not submit a development plan document for independent examination unless they think the document is ready for independent examination.

42. The Planning Inspectorate's ('PINS') Procedure Guide for Local Plan Examinations (updated 28 August 2024) states:

'1.1. The LPA should rigorously assess the plan before it is published under Regulation 19 to ensure that, in their view, it is sound and meets all the necessary legal requirements. In particular, they should ensure that it takes full account of all relevant policies in the NPPF and relevant guidance in the PPG. The plan should identify all the matters which need to be planned for, and provide policies to address them, paying careful attention to deliverability and viability. This approach may raise uncomfortable questions but the purpose of preparing a plan is to address all the necessary matters as far as possible, and not defer them to future updates or rely on the Inspector to deal with them, or to 'fix' deficient plans at examination.

1.2. Section 20(2) of the PCPA specifically states that the LPA must not submit the plan unless they think it is ready for independent examination. Having considered the Regulation 19 consultation responses, the LPA should only submit a plan if they consider it to be sound and there will not be delays of over 6 months during the examination because significant changes or further evidence work are required. It must not be assumed that examinations can always rectify significant soundness or legal compliance problems, which would require more than limited additional work to address. Before submission, the LPA must do all it can to resolve any substantive concerns about the soundness or legal compliance of the plan, including any raised by statutory undertakers and government agencies. Particular attention should be given to the duty to cooperate. Statements of Common Ground can be very helpful in this regard.' (my emphasis)

43. It is therefore clear to me that LBN cannot ignore evidence that the site allocation is not viably deliverable. This is an issue which goes to soundness and viability and deliverability is an issue which the PINS guidance explicitly states should be paid careful attention to.

The relevance of the draft NPPF and the likely change in Newham's housing targets and how the Council should consider this in relation to the draft Site Allocation and emerging Local Plan?

44. The Government is currently consulting on some proposed amendments to the NPPF and PPG. This includes a revised method for calculating housing need. In the event that the

proposed amendments are adopted, Newham's housing requirements would drop by c45% (from 4188pa to 2178pa). Whilst the text of the PPG amendments is indicated in the consultation document, the Government has not published the full proposed text to the PPG amendments.

45. The regulation 19 draft of the NLP provides for a delivery target of 2974dpa in the short term, 3,836dpa in the medium term and 3,475 in the long term (page 208). The consultation into the draft NPPF ends this month and any amendments are to be expected soon after that. In the event that the revised method becomes adopted national policy then LBN will need to decide how to react to this.

46. Annex 1 to the consultation draft of the NPPF sets out proposed transitional provisions to apply to local plans which are at an advanced stage of preparation. Draft paragraph 226 states:

'The policies in this Framework (published on ...) will apply for the purpose of preparing local plans from [publication date + one month] unless one or more of the following apply:

- a. The emerging annual housing requirement in a local plan that reaches or has reached Regulation 19 (pre-submission stage) on or before [publication date + one month] is no more than 200 dwellings below the published relevant Local Housing Need figure...

Where a, b or c applies, the plan will be examined under the relevant previous version of the Framework.;

47. If the draft NPPF is eventually adopted, it appears that because LBN's draft plan provides for more housing than would be required under the relevant Local Housing Need figure, it would be examined under the previous version of the NPPF (i.e. that which is currently in force). It is not explicit from the consultation documents as to whether this would include what would then have become the old method of calculating housing needs (i.e. the current housing need figure for LBN).

48. However, even if the plan were to be examined against an old housing need figure, I would expect that LBN will want to consider the potential impact of continuing to pursue a local

plan which significantly over-provides for housing when considered against the Government's latest housing need figures. This is likely to include the viability of delivering so much housing and whether, in practice, it will be difficult to defend many of the housing allocations if they are, in fact, not required to meet housing needs.

CONCLUDING REMARKS

49. I trust that I have addressed all of the matters asked of me. Please don't hesitate to contact me if I can be of any further assistance.


39 Essex Chambers

5 September 2024

Appendix 4



WHITE
BRIDGE



THESET LTD

Needs Assessment for an Aparthotel Development at 190-194 High Street in
Stratford, London

March 2024

Private & Confidential



██████ Auditor
Operations Manager
Theset Ltd
190 High Street
Stratford
London
E15 2NE

Whitebridge Hospitality Limited
5 Merchant Square
London
W2 1AY
United Kingdom

15 March 2024

Dear ██████,

In accordance with your instructions, we are pleased to submit this report in respect of the Needs Assessment you have requested in relation to the proposed redevelopment of 190-194 High Street in Stratford, London, into an aparthotel concept.

This document is based on our present knowledge and information with respect to the relevant trends in the relevant tourism and hotel sectors in London and the London Borough of Newham on completion of our research and analysis in July 2023.

The work we have undertaken to date has addressed the issues agreed in the Engagement Letter dated 13 July 2023 and signed by you on 14 July 2023. It is not suitable for any other purpose or for use by any other person.

Accordingly, we stipulate that this report is for your sole use and must not be disclosed in whole or in part to any other party without our prior written agreement on a hold harmless basis with any such third-party.

We would be pleased to hear from you should you have any comments regarding the research undertaken to date and the findings arising.

Yours sincerely,

██████████
Director
Whitebridge Hospitality Limited
M: ██████████
E: ██████████

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3.	Tourism Overview	14
4.	GLA and Mayoral Serviced Accommodation Context	17
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Background

- We understand that Theset Ltd (the Applicant) owns the buildings at 190-194 High Street, E15 2NE, London. This site is located within the London Legacy Development Corporation's (LLDC) planning boundaries.
- The Applicant would like to redevelop the existing buildings into a mixed-use scheme, incorporating an aparthotel (C1 Class Use) and residential units (C3 Class Use). The hotel component of the project will be operated by a reputable aparthotel operator.
- In order to secure planning permission for this project, the Applicant has been working with the planning consultancy team at Icen Projects and Maccreanor Lavington Architects. As part of this process, you have appointed Whitebridge Hospitality Ltd to support Icen Projects in preparing their case to be presented to LLDC and to provide the Applicant with a Needs Assessment for the project in respect of hotel use.

Scope of the Engagement

- The scope of this assignment is as set out in our Engagement Letter and accepted by you.
- For the purposes of this report, the following issues have been addressed:
 - Economic and general overview of London, LLDC and LBN, including a brief overview of the local office sector and local regeneration projects.
 - Tourism sector review, of tourism trends in London (and LLDC and LBN where available), including commentary on future prospects based on tourism initiatives being proposed.
 - Review of the project site and comments on the proposed concept for the proposed aparthotel development.
 - Analysis of London hotel supply overall and how it has/is evolving.
 - Review of the competitive environment relevant to the project, including interpretation of relevant performance trends data.
 - Future hotel demand analysis, based on forecasts for London and relevance to the project.

Approach

- To address the objectives identified within the scope of services, we have undertaken the following:
 - Visited and toured the site and its environs in order to assess the site in terms of its suitability and location for the proposed development.
 - Met with representatives of the Applicant and spoken with representatives of Icen Projects and received data from Maccreanor Lavington Architects in order to gain a detailed understanding of the proposed concept, anticipated market positioning and any design issues that could impact on performance.
 - Conducted an appraisal of the local competitive environment based on the performance of competitor properties in the relevant area.
 - Acquired relevant tourism and hotel performance data.
 - Undertaken relevant desk-based research and interviews with parties with knowledge useful to this assignment.

Limitations of the Report

- Our research for this report was completed in July 2023. No account has been taken of matters arising after the completion of our research.
- Whitebridge Hospitality Ltd has not verified any information that has been provided by you or any third-party in relation to this assignment.
- We do not guarantee that any of the recommendations or conclusions in this report will necessarily succeed or arise as envisaged, as actual events may have a material impact on our underlying assumptions, but they have been conscientiously prepared on the basis of information furnished to us and our knowledge of the industry.
- This study should be read in conjunction with, and is subject to, the Engagement Letter, together with our standard terms and conditions.



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2. Economic & General Overview

2.1.1 London – A Leading Global City

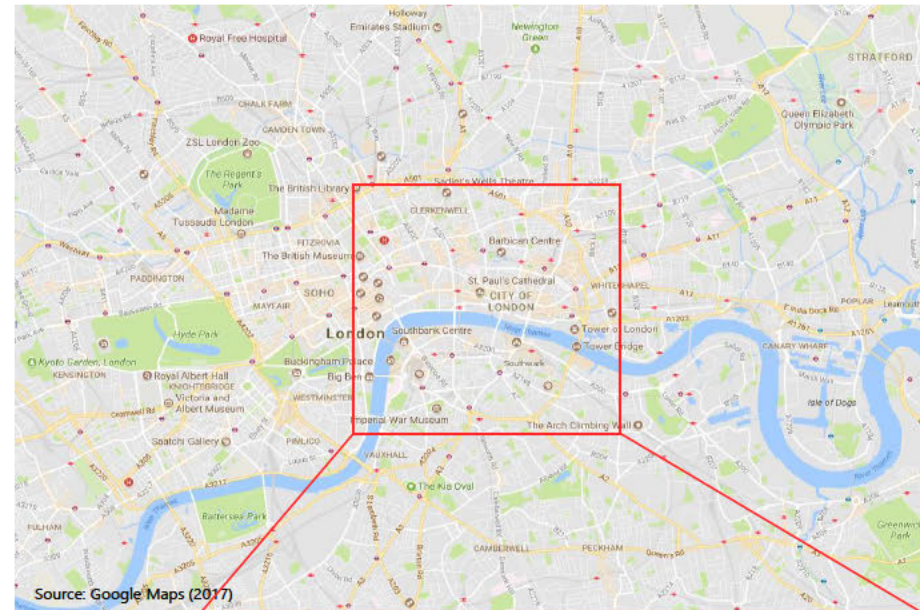
Introduction

- London is thought to have been first founded in 43AD by the then occupying Romans. The settlement was sacked by Queen Boudica in 61AD and re-emerged as the capital of the Roman province of Britannia in 100AD (superseding Colchester).
- For the first millennia of its existence, London fluctuated in and out of existence and until the 1300s barely expanded beyond the ancient boundaries first established by the Romans (see maps right). However, since the 1300s London has evolved into one of the world's leading global cities and has many attributes which support this claim (listed in the blue box below).
- London's long history, rich heritage and diversity are ideally reflected in the fact that the Museum of London has the largest urban history collection in the world, with more than 6m artefacts (from the Bronze Age to the 21st century) and attracts more than 1m visitors per annum.
- As the capital of the UK, and a global economic and cultural centre, London is visited by millions of business and leisure travellers every year, and employs some 5.7m people (equivalent to 16.8% of the national total, reference Appendix 8.1).
- With its excellent transport links and plethora of museums, shopping, leisure and entertainment options, tourism is one of London's prime industries contributing more than £36bn to the local economy each year and supporting around 700,000 jobs.
- London is not only the largest city in the UK (more than 13% of the total population), it has the largest municipal population in the EU and was the world's most populous city between 1831 and 1925. Today, London is continuing to expand and is investing heavily in new infrastructure and regeneration projects to ensure its long-term appeal and economic prosperity.

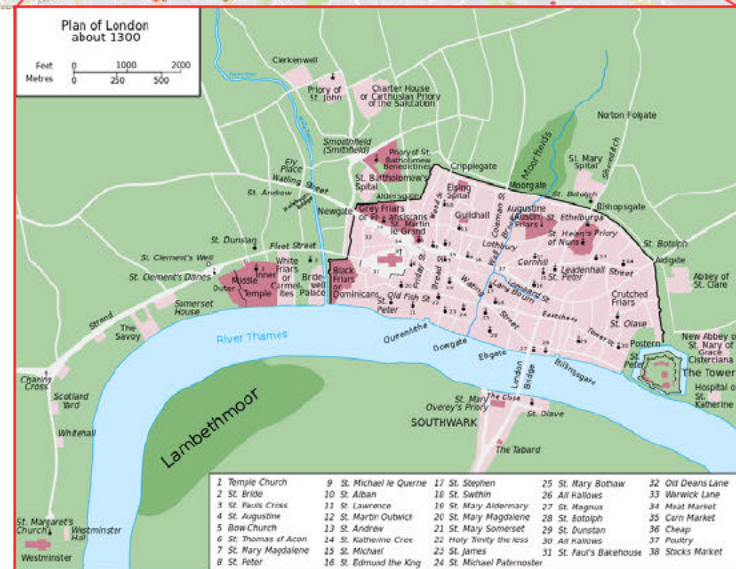
London Facts

- A world leading international financial centre (according to the Global Financial Centres Index, GFCI, #2 in 2022).
- One of the greenest cities for its size in the world, with nearly 173sqkm of parks (approx. 35% of the city) and in 2019 nominated the first National Park City in the world by National Park City Foundation.
- Largest concentration of higher education institutions in Europe and one of the highest in the world, with over 40 universities and higher education institutions, and over 125,000 international students in 2018/19.
- Most cosmopolitan city in Europe and perhaps second only to New York globally, with some 300 different languages being regularly spoken (according to London First).
- Sixth highest number of resident Ultra High Net Worth Individuals (UHNWI, 4,535 residents) of any city in the world in 2020 (according to *Visual Capitalist*).
- Home to some of the largest retail areas in the world, including Westfield London (the largest shopping centre in Europe).
- World Cities Culture Report 2018 suggested London's attractions draw the highest number of visitors per annum (pre-Covid 19) and it has a world leading four UNESCO World Heritage Sites.
- London was the 3rd most visited city in the world pre-Covid 19 (after Hong Kong and Bangkok), attracting over 21m international visitors in 2019.
- Named as the world's best destination for 2019 in the Tripadvisor annual Travellers' Choice awards.
- Leading global centre for movie visual effects (centred on Soho Square) and the world's leading high tech hub outside the USA (#7 globally, by volume of venture capital invested, according to *Rise of the Global Startup City* report).
- Busiest airport city in the world (over 178m passengers in 2019), with planned new runway capacity at Heathrow.

Maps of London Through the Ages



Source: Google Maps (2017)



Source: By Grandiose - Own work, CC BY-SA 3.0, <https://commons.wikimedia.org/w/index.php?curid=19947379>

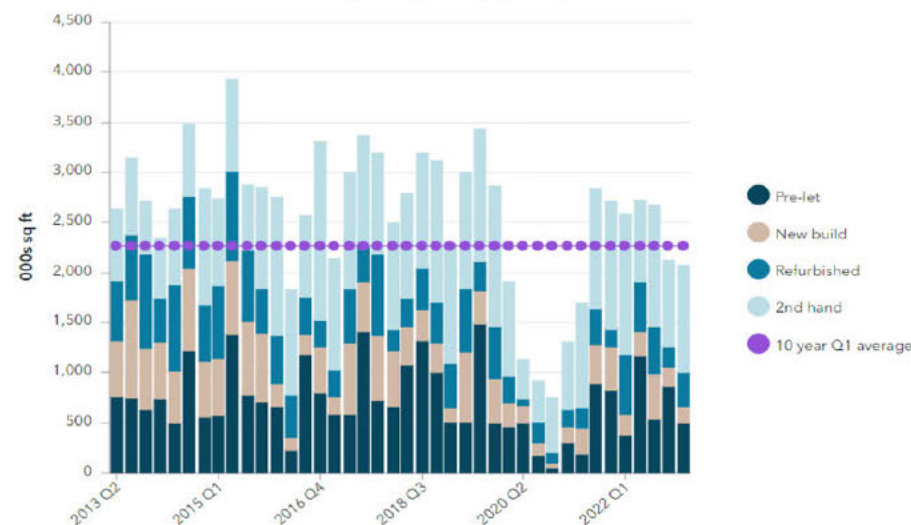
2. Economic & General Overview

2.1.2 London – Office Sector

Overview

- As shown in the graph top right, Covid-19 (C19) had a dramatic impact on the office sector in Central London, whereby stagnation in leasing activity was relatively sustained from Q1 2020 to Q2 2021 as occupiers considered their occupational strategies in light of increased levels of remote working. Until 2020 and C19, despite other threats to the city's office sector (including Brexit), leasing activity had grown year-on-year and 2019 had recorded a particularly strong level of performance.
- As a continually evolving economy and home to a dynamic workforce, London was always expected to drive further office development activity post-C19 and this is reflected in the stronger take-up levels recorded since Q3 2021. In particular, demand from the following is expected to grow materially (more details are provided in Appendix 8.2):
 - TMT firms** (17% of total leasing volumes in Q2 2023 by sector according to Colliers *London Offices Snapshot Q2 2023*: many of these have made long-term commitments to purpose-built new HQ buildings and as the importance and prevalence of technology continues to increase, more tech companies are expected to start-up and seek accommodation in London (the tech capital of Europe).
 - Biotech and Life Sciences**: as these grow, they are expected to add to the TMT demand.
 - Flexible Working Providers**: (although their rate of take-up has slowed, still 7% in Q2 2023) will continue to play an important role in London in future, especially post-C19, as corporates assess their space and flexible working requirements in more detail.
 - Financial & Professional Services** (26% and 18% respectively): potential loosening of regulations could stimulate new demand in finance and professional services in the longer term, but for the next few years such demand is still uncertain.
 - Legal**: despite Brexit, English Law is still respected internationally and as the UK reaches further afield in order to trade more globally after Brexit, legal services are expected to remain very strong in future. Indeed, Goodwin Procter and Dentons recently committed to large new offices.
- Other notable trends include:
 - According to Knight Frank, employment statistics indicate that the number of people in London employed in TMT overtook those in Finance & Insurance as far back as 2013. TMT firms are 'borderless' and are less affected by Brexit, thus fuelling much of the office take-up in recent years and expected to do so for many years to come.
 - Post-C19 and despite many immediate headwinds (war in Ukraine, rising energy prices, inflation and rising interest rates), Knight Frank highlight that business growth remains high.
 - Demand for quality office space is accelerating at the expense of poorer quality stock.
 - Many agents have highlighted that due to subdued demand in some markets, the vacancy rate rose to 10.1% in Q2 2023, its highest level since Q4 2009 (and remains above the 10-year average of 5.5%).
 - Colliers data (graph bottom right) show that despite these uncertain times, the future of London as a commercial and business centre remains positive as more investors and developers are developing more office space across the capital.

London Office Trends – Take-up by Quality (m sqft)



Source: JLL Central London Office Market Report Q1 2023

London Office Trends – Central London Development Pipeline



Source: Colliers London Offices Snapshot Q2 2023

Deloitte Office Crane Survey Winter 2022

- In Appendix 8.2 we present further evidence of the London office sector's recovery and positive future outlook as indicated by Deloitte's research.

2. Economic & General Overview

2.1.2 London – Office Sector

- The map top right highlights the key office clusters in London and shows the location of the project site within this context. It demonstrates that the site is not within any of these long recognised clusters, but is close and easily accessible to two of those highlighted, namely: the City and Canary Wharf (Docklands) (comments on these below). The foregoing having been said, Stratford is emerging as its own discrete office cluster, which is now being recognised by many real estate agents, as shown in the map bottom right.

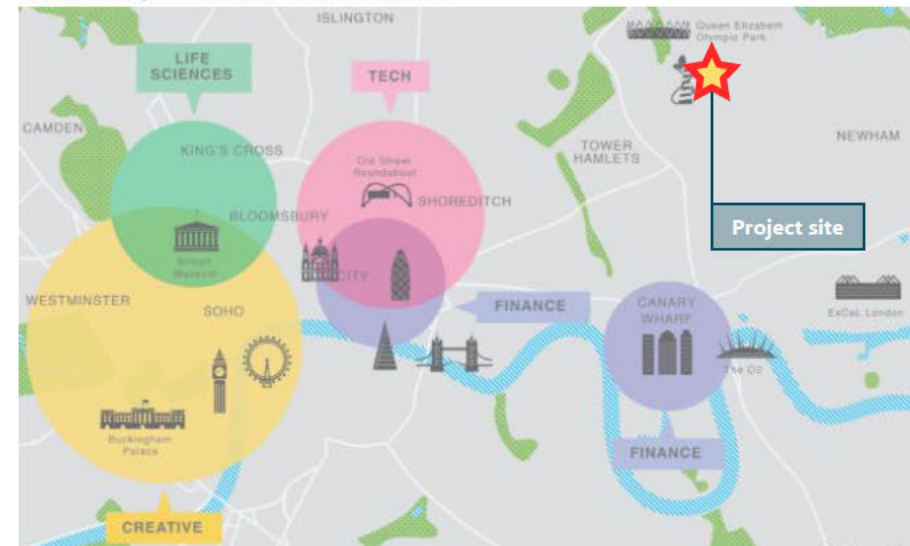
City

- Historically, the City of London has been home to banking, insurance and financial services, as well as the professional sectors; whilst the fringe areas (the City Fringe) have traditionally housed the TMT and FinTech sectors, business and consumer services, retail and leisure, and public services. The evolution of the TMT and FinTech sectors has resulted in companies that were previously seen as risky start-ups now being viewed as valuable and stable companies, with the ability to pay higher rents for the best quality space and so developers have become more active in the trendier and more *avant garde* fringe locations.
- According to Knight Frank, take-up in the City (and Southbank) in the 12 months to Q1 2023 totalled 5.3m sqft, which is 20% below the long-term annual average. At a more detailed level, take-up of new and refurbished space was above trend in Q1 2023 and during the previous 12 months, accounting for around 66% of total take-up. Professional services firms accounted for 40% of demand.
- Prime rents have remained unchanged (at circa £75.00/sqft) and incentives held steady at 24-27 months on a typical 10-year lease. The average vacancy rate rose to 10.3% (compared to a long-term average of 6.7%), but new supply remains limited.

Docklands (Canary Wharf)

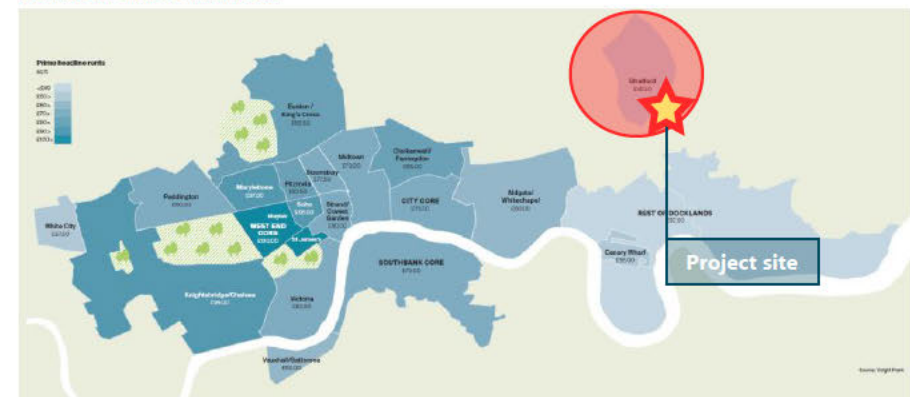
- Canary Wharf is at the heart of this cluster and very much characterised by the professional services and financial sectors. There is emerging evidence of more diversification in Canary Wharf, with a large recent transaction being concluded with Genomics England (a government-funded company that sequences patient genomes for the NHS).
- A rise in vacant new and refurbished space offset an almost 1% fall in second-hand availability, resulting in a vacancy rate of 15.9% across Docklands and Stratford combined. There were no development completions in Q1 2023.
- Prime rents were unchanged in Q1 2023 and incentives remain at 27-30 months on a typical 10-year lease.
- Based on the foregoing and previous, it is evident that London remains a popular commercial hub for businesses, as despite multiple major headwinds, the capital's office market remains active and dynamic and is diversifying. It is also hoped that the proposed 'Edinburgh Reforms' may boost demand from the professional and financial sectors even more strongly in the coming years as the UK seeks to optimise its position post-Brexit.

London Key Economic Growth Clusters



Source: London & Partners

London Office Markets



2. Economic & General Overview

2.2.1 London Borough of Newham – Overview

Introduction

- We recognise that the project site lies within the LLDC's planning boundaries, however, for the purpose of this report the LBN has been used as the assessment area as the majority of LLDC lies within LBN for the purposes of reporting (in effect LLDC is largely part of LBN and the area will revert to LBN in 2024). Specific data on economic activity within the LLDC site available at this time are presented at the end of this section.
- LBN (see map top right) lies to the east of the City of London and the London Borough of Tower Hamlets and north of the River Thames. It includes much of the redeveloped Docklands area (east of Canary Wharf), including Royal Docks, as well as a significant part of the Queen Elizabeth Olympic Park.

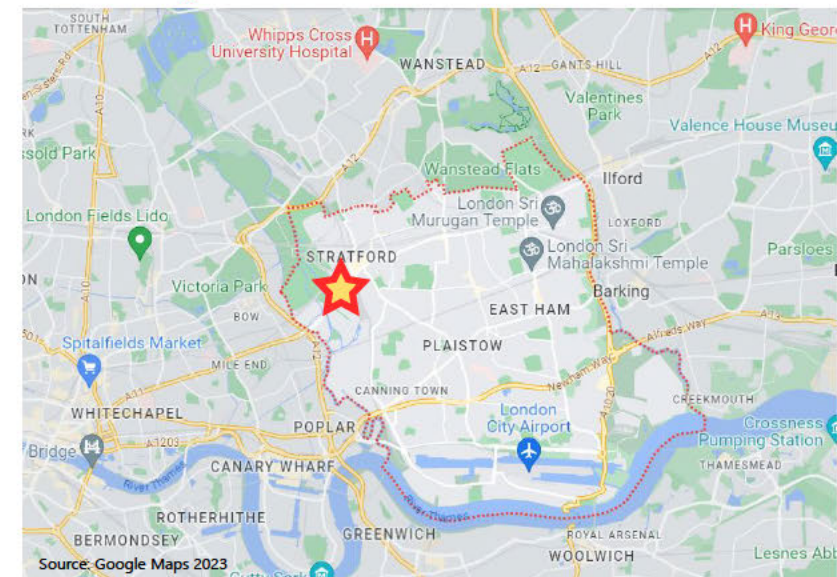
Economic Overview

- According to a report entitled *We are Newham State of the Borough Report 2021*, LBN is largely a residential borough. However, it is also home to two significant enterprise nodes, namely Royal Docks and Stratford, whereby both were subject to significant regeneration in recent decades. Royal Docks were first to benefit, with the development of London City Airport and ExCel. Some years later, when London won the right to host the 2012 Olympics, vast areas of formerly industrial sites and railway lands were aggregated and redeveloped into a state-of-the-art sporting complex (more details later in this section). On the back of such enormous regeneration, LBN is quickly transforming itself economically.
- With reference to LBN's latest data on its economy and employment trends, 70.7% of residents are in employment (lower than the London average of 75.5%), 5.6% are unemployed (higher than the London average of 4.6%) and 75.6% are economically active (lower than the London average of 79.2%).
- The most significant large employer in the borough is Education, top medium-sized employers are in Accommodation & Food Services. The top four small employers are Health, Retail, Accommodation & Food Services and Business Administration & Support Services. Over 25% of the working population is in Professional occupations. Graphic bottom right provides more details of the most active economic sectors in the borough.

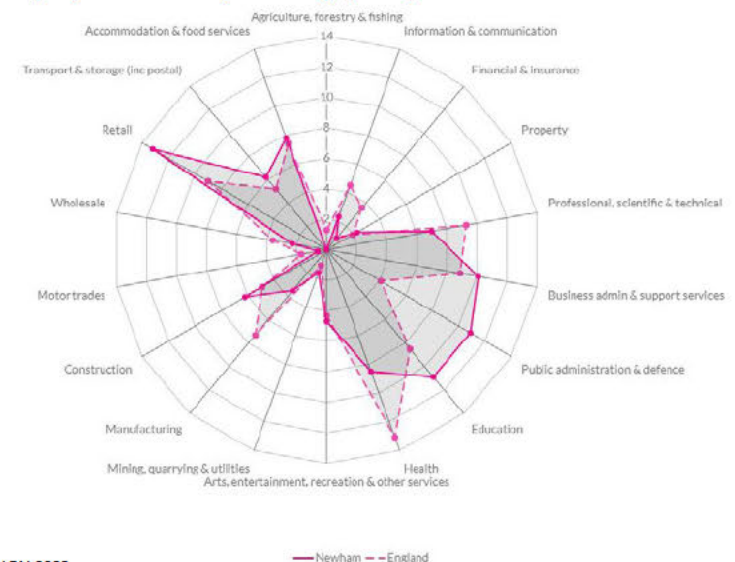
Demographic Overview

- According to *State of the Borough Report 2021*, LBN has one of the most entrepreneurial, diverse and young populations in the UK, with over one-third being under 25 years old. It is home to around 364,000 people (the third highest of the London boroughs), with the population projected to rise to over 500,000 by 2050. The borough reflects the world, with over 100 different languages spoken and 72% of residents being from Black, Asian and Ethnic minority communities.
- The median age of inhabitants in LBN is around 32.3 years (London average is 35.6 years). Around 70% of the population is in the 18-64 years age range and only 7.7% are aged 65+.
- Reflecting the regeneration and high volumes of construction activity still ongoing in its two economic centres, Stratford and Royal Docks are expected to experience the highest population growth in the borough, 43.1% (an increase of 16,900 inhabitants from mid-2020 to mid 2025) and 45.2% (increase of 7,900 inhabitants) respectively.
- In summary, LBN is quickly emerging as a dynamic and growing district in London, where companies and people are keen to be located.

London Borough of Newham



LBN Employment Rate by Industry (2021)



Source: LBN 2023

2. Economic & General Overview

2.2.2 London Borough of Newham – Office Sector Overview of Stratford

Overview

- The Stratford area is an emerging office district, developing on the back of the 2012 Olympics-driven regeneration of this part of London.
- According to JLL, the first leasing deal in Stratford for 12 months occurred in Q1 2023, indicating that the destination has been relatively slow to pick up again post-C19. This was Teesside University taking 27,000sqft at Here East (not strictly in LBN, but still of relevance and within the perceived Stratford area).
- Knight Frank have indicated that demand has more than doubled and the increase is attributed to the public sector which accounts for 75% of the requirements total. Prime rents in Stratford increased by £1 to £48.50/sqft. Rent free periods are between 27-30 months for a 10-year lease. Vacancy rates were around 15.9% in Q1 2023.
- For the second consecutive quarter there were no development completions. According to the *Deloitte London Office Crane Survey Summer 2023*, the under-construction development pipeline comprised two projects totalling some 600,000sqft of new office space. These should complete by 2024.
- Much of the existing office stock in Stratford is situated within the Queen Elizabeth Olympic Park, with significant nodes at Here East, the International Quarter and south of the London Aquatics Centre. These and other regeneration-led features of Stratford are highlighted on the map overleaf (with some commentary on the following pages).
- Notable companies and organisations that have chosen to locate here include:
 - BT Sport
 - Ford Mobility
 - Staffordshire University London
 - UAL London College of Fashion
 - UCL East
 - Financial Conduct Authority (FCA)
 - Transport for London (TfL)
 - UNICEF UK
 - Cancer Research UK.

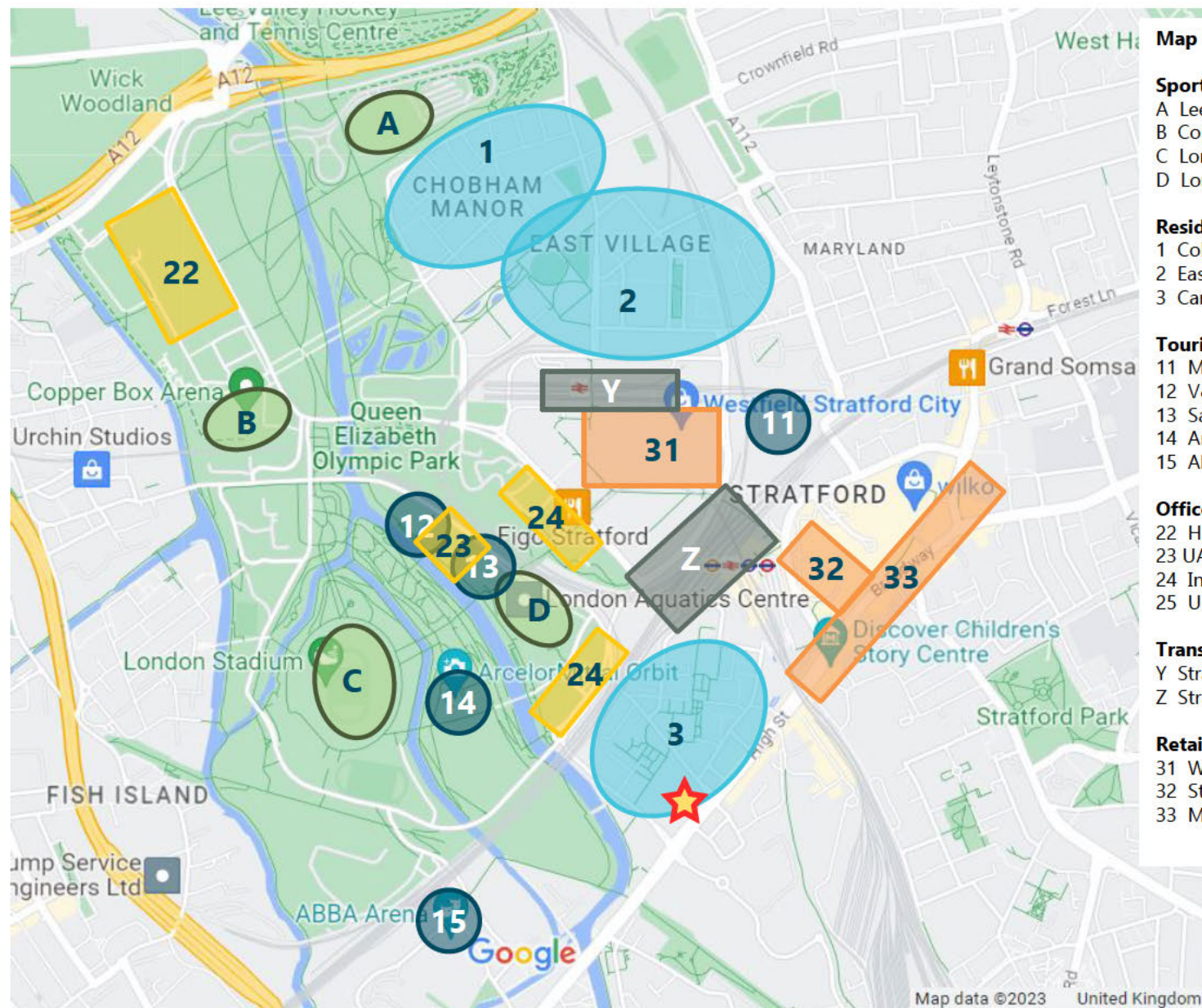
Docklands & Stratford Q4 2022 Take-up by Sector (m sqft)



Source: Knight Frank London Office Market Report Q1 2023

2. Economic & General Overview

2.2.3 London Borough of Newham – Regeneration Projects



Map Key

Sports Venues

- A Lee Valley VeloPark
- B Copper Box Arena
- C London Stadium
- D London Aquatics Centre

Residential Quarters

- 1 Cobham Manor
- 2 East Village
- 3 Carpenters Estate (proposed)

Tourist Attractions

- 11 MSG Sphere (proposed)
- 12 V&A East
- 13 Sadlers Wells
- 14 ArcelorMittal Orbit
- 15 Abba Arena

Office & Education Nodes

- 22 Here East
- 23 UAL London College of Fashion
- 24 International Quarter London
- 25 UCL East

Transport Hubs

- Y Stratford International
- Z Stratford Station

Retail Zones

- 31 Westfield Stratford City
- 32 Stratford Shopping Centre
- 33 Main street retail

2. Economic & General Overview

2.2.3 London Borough of Newham – Regeneration Projects



Sports Venues

- **Lee Valley VeloPark** – comprising a velodrome, BMX racing track and mountain bike trails. Hosts international events.
- **Copper Box Arena** – multi-sport venue for community use, athlete training and major events (such as 2021 Wheelchair Rugby League World Cup).
- **London Stadium** – formerly the 2012 Olympic Stadium, now a multi-sport outdoor stadium and home to West Ham United FC.
- **London Aquatics Centre** – designed by Zaha Hadid and formerly venue for 2012 Olympics swimming events. Open to the public and used to host international events.

Residential Quarters

- **Cobham Manor** – new residential district developed from the Athletes Village, today offering some 850 homes.
- **East Village** – new residential district developed from the Athletes Village, today offering some 2,818 homes.
- **Carpenters Estate (proposed)** – an established residential area, covering 23 acres and hosting some 710 homes. Plans are to raze the site and redevelop as modern new housing and community amenities. Timing of works not known at this time.

Tourist Attractions

- **MSG Sphere (proposed)** – a new music and entertainment venue to be built by the Madison Square Garden Company (intended to be identical to the MSG Sphere Las Vegas). Project secured planning approval in 2022, but in 2023 Michael Gove put it on temporary hold. Future timings to be confirmed.
- **V&A East** – comprising two buildings and due to open in 2025. V&A East Storehouse will be located at Here East and V&A East Museum close to Endeavour Square.
- **Sadlers Wells East** – a new hub for creativity, with 550-seat flexible theatre and six studios creating and developing dance productions.
- **ArcelorMittal Orbit** – a 115m high sculpture and observation tower, Britain's largest piece of public art. Visitors can descend the structure using a 178m long slide.
- **Abba Arena** – the purpose-built concert residency of the ABBA Voyage experience, hosting concerts that feature avatars of the group as they appeared in the 1970s.

Office and Education Nodes

- **Here East** – strictly speaking, not located in LBN, but still an important regenerative feature of the Queen Elizabeth Olympic Park, and likely to generate overnight demand for hotels in the wider Stratford area. Formerly the media centre for the 2012 Olympics, since converted into a tech hub for corporations. Companies based in Here East include: BT Sport, Staffordshire University London, Studio Wayne McGregor and Ford Mobility.
- **International Quarter London** – a business-related development built by Lendlease and LCR. Current office tenants include: The Financial Conduct Authority (FCA), Transport for London (TfL), UNICEF UK and Cancer Research UK.
- **UCL East** – biggest development in University College London's (UCL) history, housing multidisciplinary research labs and studios exploring ecology, robotics, urbanism, culture, disability and heritage.
- **UAL London College of Fashion** – moving to a new purpose-built campus in the East Bank area of the Queen Elizabeth Olympic Park. The campus is being developed alongside new sites for other world leading organisations (including Sadler's Wells, V&A and BBC).

Transport Hubs

- **Stratford International** – despite the name and intention, for the moment the station has no international services. It is served by Southeastern trains, providing domestic routes only. A separate DLR terminus is located over the road.
- **Stratford Station** – a major multi-level railway station, the 5th busiest in Britain. It offers Underground (Central, Elizabeth, Jubilee), Overground, DLR and National Rail (West Anglia Main Line and Great Eastern Main Line) services.

Retail Zones

- **Westfield Stratford City** – representing an investment of £1.75bn, employing around 10,000 jobs and covering a total retail floor area of 177,000sqm, it is the largest shopping centre in the UK by land area and 4th largest by retail space. It has approximately 280 stores and 70 restaurants.
- **Stratford Shopping Centre** – its strategic location opposite Stratford Station contributes to the very high footfall through the centre (over 26m visitors per annum), as many people use it as a cut-through between the station and Stratford Broadway (part of the main street retail of Stratford). It has approximately 62 stores.
- **Main street retail** – encompassing Broadway, The Grove and Romford Road.

2. Economic & General Overview

2.3.1 London Legacy Development Corporation – Overview

Introduction

- LLDC was formed in April 2012 to develop a dynamic new heart for east London on the site of the London 2012 Olympic Games (today known as Queen Elizabeth Olympic Park), with the goal of creating opportunities for local people and driving innovation and growth.
- Most of the £9.6bn investment in London 2012 was made in and around Stratford, creating all the right ingredients and new infrastructure to become a leading destination for business, innovation and tourism.
- According to Opportunity London, Queen Elizabeth Olympic Park and its venues have been visited by more than 44m people since 2013.

Economic Overview

- According to the Mayor of London (www.London.gov.uk), to June 2022 LLDC had supported the delivery of around 25,000 jobs on and around Queen Elizabeth Olympic Park most of which are located at the two new business districts at Here East on the Park (circa 4,500 employees) and at International Quarter London (outside the Park boundaries but within LLDC's Mayoral Development Corporation area), as well as other jobs created on the Park itself, its venues and neighbourhoods.
- According to Opportunity London, LLDC is expected to have created around 40,000 jobs in the area by the mid-2030s and should deliver some 33,000 new homes in the wider Mayoral Development Corporation (MDC) area by 2036.
- In July 2022, London & Partners reported that according to independent research from Oxford Economics, Here East had created over 10,300 employment opportunities, sustaining £317m in wages and contributing £700m in GVA in 2021 alone.
- From an environmental perspective, the legacy program has achieved 25% reduction in corporate energy consumption since 2015, targeting Net Zero by 2030, and has cleaned up around 6.5km of waterways and the created 10 new wildlife habitats on the Park.
- As a result of the foregoing success, the International Olympic Committee (IOC) has noted London as a blueprint for other cities to follow, especially in relation to driving job creation and to the development of educational and cultural opportunities. According to the IOC, the economic impact of the Games on East London has been significant, exceeding pre-Games growth projections three-fold, with a 40% growth in local employment and over £400m additional investment in the area.

Queen Elizabeth Olympic Park





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3. Tourism Overview

3.1 London – Overview

Introduction

- Prior to C19, tourism played a vital role for London, employing circa 700,000 people (1 in 7 of the capital's jobs) and contributing £36bn per annum to the economy (according to *A Tourism Vision for London*, by London & Partners), accounting for around 11.6% of the capital's GDP. Over 50% of visitors to the UK visit the capital. These high levels of performance are expected to be achieved again in the future now that C19 travel issues have been resolved and global tourism is beginning to recover.

Tourism Trends

- Owing to the disruption caused by C19, the availability of data remains very restricted. For example, the Office of National Statistics (ONS) has not been able to update its International Visitor statistics since early 2020 and Visit Britain was unable to collect data in 2020 and Q1 2021. Thus, here below we review the historic data and any new data available at this time.
- According to ONS (reference Appendix 8.3), in 2019, London attracted an estimated 21.7m international visitors staying nearly 119m nights and spending £15.7bn. Until 2018, the number of visitors and number of nights stayed had increased year-on-year since 2009 (see graph top right), whereas spend was tending to plateau. In 2019, the number of visitors, nights generated and spend all increased materially despite prevailing uncertainty around Brexit.
- Domestic visitors are also important, with around 12m visitors staying an estimated 28.5m nights in 2019 (latest full year data available) and generating an expenditure of around £3.0bn. London also welcomed 281m domestic day-visitors in 2019, generating a further £14.5bn of expenditure.
- As highlighted in the graph top right, during the period Apr-Dec 2021, Domestic demand rebounded very strongly (some have referred to this as 'Revenge Tourism', as travel-starved consumers materially increased their travel habits and expenditure). It remains to be seen if such growth will be sustained longer term, but it does prove that London's appeal is strong and that recovery is expected within its tourism industry.
- We would also highlight that London was one of the most visited cities in the world (maintaining 3rd place in the last *Top 100 City Destinations* report published by Euromonitor International in 2019, behind Hong Kong and Bangkok), and is highly likely to remain so when normal trading resumes post-C19.

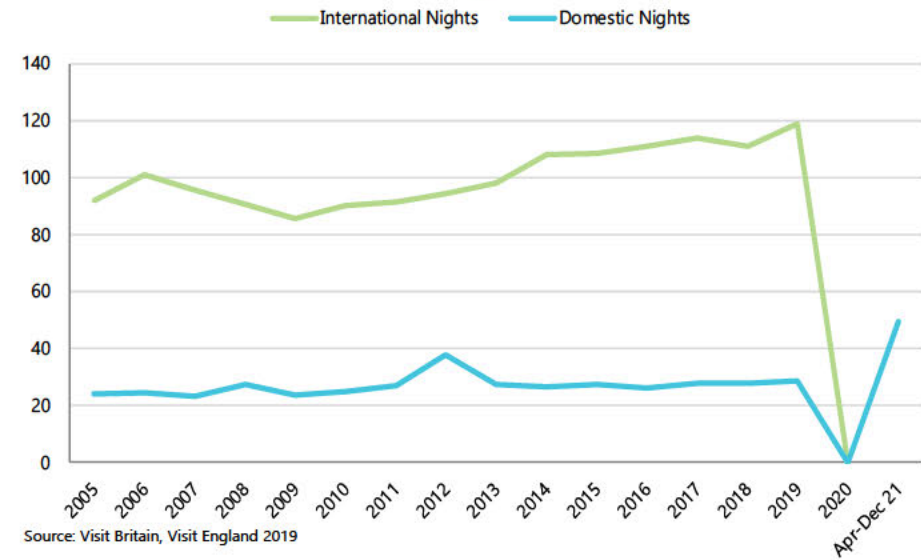
Meetings, Incentives, Conferences & Exhibitions (MICE)

- London is one of the leading MICE destinations in the world, with numerous venues, buildings and facilities capable of hosting large events. One of the largest annual events is World Travel Market (WTM) which attracted over 50,000 delegates in 2019.
- In 2019, London ranked as the 8th most popular city in the world by the International Congress & Convention Association (ICCA), hosting some 143 events in that year.

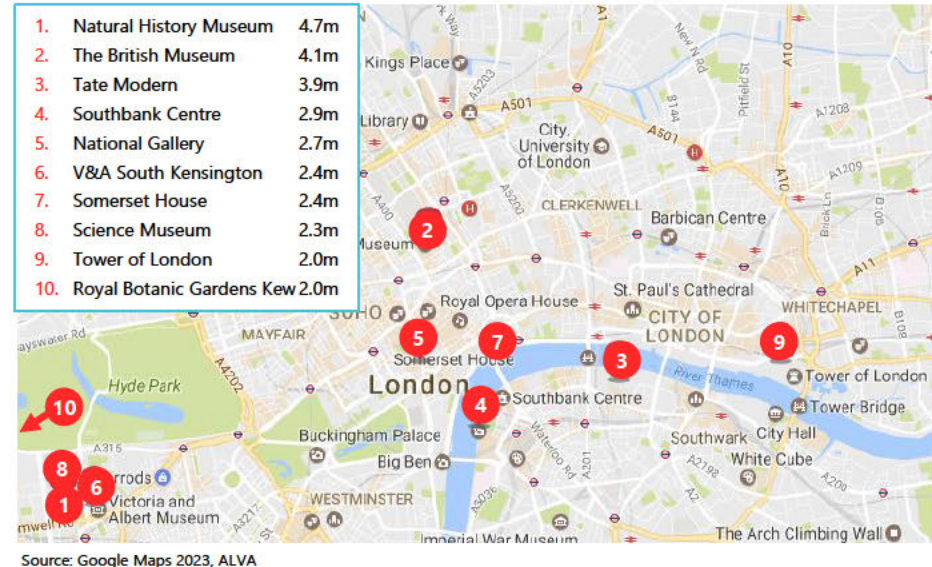
Major Attractions

- London's iconic museums and galleries are a major draw to many visitors. The four largest attractions: #1 Natural History Museum, #2 The British Museum, #3 Tate Modern and #4 Southbank Centre together attracted over 15.6m visitors in 2022 (see map bottom right).

London Overseas and Domestic Visitor Nights



Top 10 Attractions London (2022 data)



3. Tourism Overview

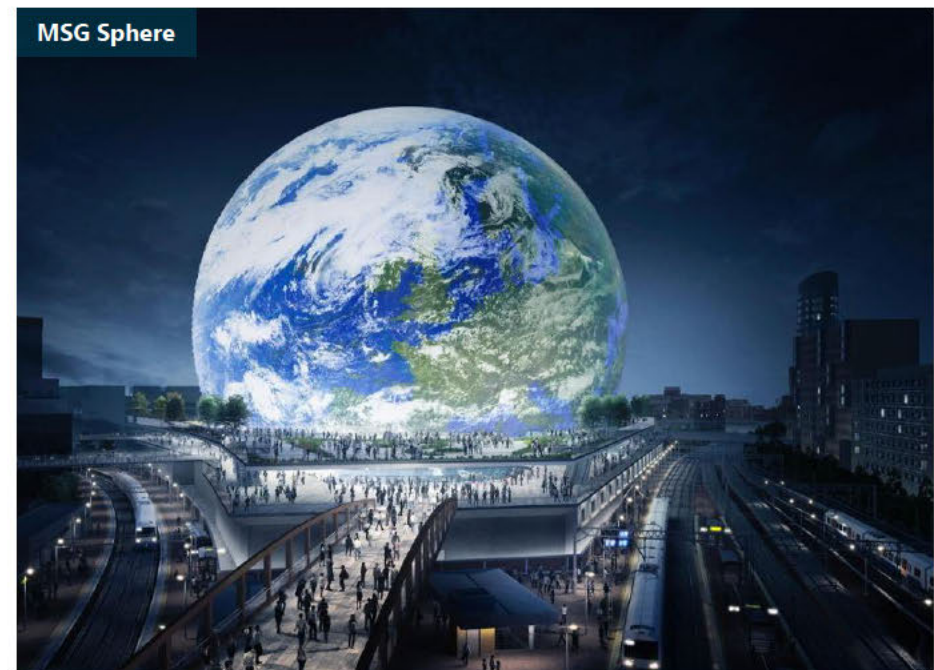
3.2 London Borough of Newham – Overview

Tourism Snapshot

- Newham takes its name from an estate called 'Ham' established in 958, whereby in Old English 'ham' meant 'a dry area of land between rivers or marshland', referring to the estate's location between the rivers Lea, Thames and Roding. LBN was created in 1965 with the merger of West and East Ham, together with North Woolwich and Barking. In history, the borough appears to have had a quiet heritage, with few major activities of note and very few historic buildings/monuments. However, LBN in the modern era is a very different story.
- As identified previously, LNB has received enormous regenerative funding and the borough is being transformed as a result, especially around Stratford.

Tourism Trends

- LBN does not produce any tourism-related statistics. However, based on original research we do have some data on visitation levels to various of its attractions in the Stratford area, highlighted here below:
 - **ArcelorMittal Orbit** – according to LLDC data published in 2019, the attraction hosted 155,000 visitors in the financial year 2018/19, down from 180,000 a year earlier and 193,000 in 2016/17. The original estimates at conception were for the attraction to receive 350,000 people per annum.
 - **London Stadium** – the 60,000-seat football facility is home to West Ham United FC and is used for concerts and other major events. No visitor numbers have been published to our knowledge, but the total per annum must be well in excess of 1m.
 - **London Aquatics Centre** – with seating for 2,500 spectators, the venue draws both regular users and events. No visitor numbers have been published to our knowledge.
 - **Abba Arena** – 1m guests had attended the venue in less than a year since opening in May 2022.
 - **Westfield Stratford City** – according to Foundation For Future London, the shopping centre was London's most popular shopping destination by footfall, with over 51m annual customer visits.
- In its recent annual report, LLDC stated its estate would attract 6.2m per annum across its attractions. These are significant visitor volumes already and are likely to increase further as new developments on the estate are completed and come on-line (such as Sadlers Wells East, V&A East and MSG Sphere).



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4. GLA and Mayoral Serviced Accommodation Context

4.1 Introduction

Introduction

- As a highly dynamic tourist destination and because tourism is a central pillar to London's growing economy, the authorities responsible for guiding the city's growth frequently review and report on the sector. Some of the recent reports published and used as the basis for formulating future development strategies and guidance are summarised in the images below.
- Over the following pages we review these key documents and highlight the rapidly evolving nature of tourism and the increasing need for serviced accommodation in the city, and demonstrate that such reports are as described, guides, and should be referred to at the same time as keeping a close eye of current and short to medium term trends. In a fast changing sector such as tourism, it is vital to be aware of current market trends and to be able to respond quickly to them.
- The GLA Economics reports have historically been used to guide The London Plan, and The London Plan 2016 was based on the August 2013 report. An updated London Plan was published in March 2021, but it does not appear to have been updated to reflect the higher number of tourists the Mayor of London has targeted more recently in his *A Tourism Vision for London* initiative (published in May 2019). Consequently, the new London Plan is based on outdated analysis from 2017 (based on 36.6m visitors per annum by 2025) and does not reflect the Mayor's much more ambitious tourism targets (of 40m visitors by 2025).



4. GLA and Mayoral Serviced Accommodation Context

4.2 Context of The London Plan (2021)



Analysis of GLA Economics Report (August 2013)

- The table below is an analysis of the tables presented in the August 2013 report prepared by GLA Economics in relation to *"Understanding the demand for and supply of visitor accommodation in London to 2036"*. We have used the same definitions with reference to Table 2.2 of the GLA Economics report.
- This analysis shows that LBN could support an additional 1,700 Rooms by 2036, assuming the 'Central' case projections prepared by GLA Economics.
- However, the 'Central' case on which the 'Potential Additional Rooms Required by 2036' shown below has been revised given the stronger than expected growth in visitor numbers in recent years and anticipated in the future, as shown over the following pages.

All* and Serviced Rooms by London Borough (2012 actual and 2036 potential)																
	As at 2012					Potential Additional Rooms Required by 2036					2012 actual + 2036 potential					
	Serviced Rooms*	Ratio	Non-Serviced Rooms**	Ratio	'All' Rooms	Serviced Rooms*	Ratio	Non-Serviced Rooms**	Ratio	'All' Rooms	Serviced Rooms*	Ratio	Non-Serviced Rooms**	Ratio	'All' Rooms	Ratio
1 Barking & Dagenham	580	0.4%	-	0.0%	580	400	0.9%	-	0.0%	400	980	0.6%	-	0.0%	980	0.4%
2 Barnet	1,220	0.9%	-	0.0%	1,220	500	1.2%	100	0.6%	600	1,720	1.0%	100	0.2%	1,820	0.8%
3 Bexley	330	0.3%	-	0.0%	330	200	0.5%	-	0.0%	200	530	0.3%	-	0.0%	530	0.2%
4 Brent	2,400	1.8%	-	0.0%	2,400	800	1.9%	100	0.6%	900	3,200	1.8%	100	0.2%	3,300	1.5%
5 Bromley	430	0.3%	130	0.4%	560	300	0.7%	100	0.6%	400	730	0.4%	230	0.4%	960	0.4%
6 Camden	17,580	13.4%	7,860	23.1%	25,440	3,700	8.6%	2,500	14.2%	6,200	21,280	12.2%	10,360	20.1%	31,640	14.0%
7 City of London	3,840	2.9%	1,030	3.0%	4,870	2,900	6.8%	1,100	6.3%	4,000	6,740	3.9%	2,130	4.1%	8,870	3.9%
8 Croydon	2,270	1.7%	160	0.5%	2,430	600	1.4%	100	0.6%	700	2,870	1.6%	260	0.5%	3,130	1.4%
9 Ealing	1,820	1.4%	30	0.1%	1,850	800	1.9%	100	0.6%	900	2,620	1.5%	130	0.3%	2,750	1.2%
10 Enfield	700	0.5%	60	0.2%	760	100	0.2%	100	0.6%	200	800	0.5%	160	0.3%	960	0.4%
11 Greenwich	1,250	0.9%	1,160	3.4%	2,410	800	1.9%	900	5.1%	1,700	2,050	1.2%	2,060	4.0%	4,110	1.8%
12 Hackney	760	0.6%	650	1.9%	1,410	1,600	3.7%	1,500	8.5%	3,100	2,360	1.4%	2,150	4.2%	4,510	2.0%
13 Hammersmith & Fulham	3,400	2.6%	90	0.3%	3,490	1,700	4.0%	200	1.1%	1,900	5,100	2.9%	290	0.6%	5,390	2.4%
14 Haringey	730	0.6%	270	0.8%	1,000	300	0.7%	100	0.6%	400	1,030	0.6%	370	0.7%	1,400	0.6%
15 Harrow	780	0.6%	460	1.4%	1,240	400	0.9%	300	1.7%	700	1,180	0.7%	760	1.5%	1,940	0.9%
16 Havering	850	0.6%	-	0.0%	850	300	0.7%	-	0.0%	300	1,150	0.7%	-	0.0%	1,150	0.5%
17 Hillingdon	9,840	7.5%	1,660	4.9%	11,500	2,400	5.6%	800	4.5%	3,200	12,240	7.0%	2,460	4.8%	14,700	6.5%
18 Hounslow	2,850	2.2%	-	0.0%	2,850	1,900	4.4%	100	0.6%	2,000	4,750	2.7%	100	0.2%	4,850	2.1%
19 Islington	2,950	2.2%	1,750	5.1%	4,700	700	1.6%	600	3.4%	1,300	3,650	2.1%	2,350	4.6%	6,000	2.7%
20 Kensington & Chelsea	15,280	11.6%	4,020	11.8%	19,300	2,700	6.3%	-	0.0%	2,700	17,980	10.3%	4,020	7.8%	22,000	9.7%
21 Kingston	950	0.7%	160	0.5%	1,110	400	0.9%	100	0.6%	500	1,350	0.8%	260	0.5%	1,610	0.7%
22 Lambeth	3,830	2.9%	930	2.7%	4,760	2,000	4.7%	700	4.0%	2,700	5,830	3.3%	1,630	3.2%	7,460	3.3%
23 Lewisham	270	0.2%	1,030	3.0%	1,300	100	0.2%	500	2.8%	600	370	0.2%	1,530	3.0%	1,900	0.8%
24 Merton	600	0.5%	30	0.1%	630	200	0.5%	100	0.6%	300	800	0.5%	130	0.3%	930	0.4%
25 Newham	4,190	3.2%	460	1.4%	4,650	1,400	3.3%	300	1.7%	1,700	5,590	3.2%	760	1.5%	6,350	2.8%
26 Redbridge	830	0.6%	1,200	3.5%	2,030	400	0.9%	700	4.0%	1,100	1,230	0.7%	1,900	3.7%	3,130	1.4%
27 Richmond	1,590	1.2%	180	0.5%	1,770	300	0.7%	100	0.6%	400	1,890	1.1%	280	0.5%	2,170	1.0%
28 Southwark	4,530	3.4%	3,770	11.1%	8,300	1,800	4.2%	1,700	9.7%	3,500	6,330	3.6%	5,470	10.6%	11,800	5.2%
29 Sutton	250	0.2%	-	0.0%	250	200	0.5%	-	0.0%	200	450	0.3%	-	0.0%	450	0.2%
30 Tower Hamlets	4,800	3.6%	2,570	7.6%	7,370	2,900	6.8%	2,000	11.4%	4,900	7,700	4.4%	4,570	8.9%	12,270	5.4%
31 Waltham Forest	590	0.4%	-	0.0%	590	200	0.5%	100	0.6%	300	790	0.5%	100	0.2%	890	0.4%
32 Wandsworth	1,130	0.9%	350	1.0%	1,480	500	1.2%	200	1.1%	700	1,630	0.9%	550	1.1%	2,180	1.0%
33 Westminster	38,180	29.0%	4,010	11.8%	42,190	9,400	21.9%	2,400	13.6%	11,800	47,580	27.3%	6,410	12.4%	53,990	23.9%
Total	131,600	100%	34,020	100%	165,620	42,900	100%	17,600	100%	60,500	174,500	100%	51,620	100%	226,120	100%

* Includes: B&B, Hotel, Hostel

** Includes: Campus, Apartments (including those referred to a 'serviced' apartments)

Source: GLA Economics "Understanding the demand for and supply of visitor accommodation in London to 2036" published August 2013

4. GLA and Mayoral Serviced Accommodation Context

4.2 Context of The London Plan (2021)



Analysis of GLA Economics Report (April 2017, Paper 88)

- The table below is an analysis of the tables presented in the April 2017 report prepared by GLA Economics in relation to "Projections of demand and supply for visitor accommodation in London to 2050" (Paper 88). We have used the same definitions with reference to the relevant tables in the GLA Economics report.
- The data shows that since their first report (Paper 58) GLA Economics has recognised the complexity of forecasting future hotel room demand for London and that therefore in their latest Paper 88 they have produced a wide variety of projections using a variety of methods.
- Assuming the 'Average of All' methods is a reasonable assumption, the total number of additional rooms required in LBN could be 3,031 by 2041, but assuming the 'Gross' estimate (which is perhaps the most realistic estimate, as it allows for closures) the total number of rooms required could be as high as 4,998.

Summary of New Supply Projections (GLA Economics, Paper 88)

	Supply Projections (Appendix A)							Derivation of Projected Room Requirements (Appendix C)						
	GLA Central Scenario	Growth per annum 2015-41	Model 2010-2015	Model 2000-2015	Model 1989-2015	Model 2010-2015 + pipe	Model 1989-2015 + pipe	Net (excluding Closures)		Gross (including Closures)			Average Of All	Growth per annum 2015-41
								GLA Central Scenario	Model 2016-2041 + pipe	GLA Central Scenario	Model 2016-2041 + pipe	Growth per annum 2015-41		
Barking & Dagenham	169	7	268	236	588	211	402	153	365	203	483	19	308	12
Barnet	847	33	667	1,266	1,178	766	1,006	767	911	1,017	1,207	46	963	37
Bexley	316	12	590	285	379	424	368	286	333	379	442	17	380	15
Brent	2,894	111	2,621	1,517	1,417	2,560	1,936	2,622	1,754	3,474	2,323	89	2,312	89
Bromley	562	22	489	214	110	560	332	510	300	675	398	15	415	16
Camden	1,760	68	4,662	3,463	5,522	2,559	3,747	1,595	3,395	2,113	4,498	173	3,331	128
City of London	4,521	174	6,300	7,097	6,021	5,554	5,662	4,096	5,130	5,426	6,796	261	5,660	218
Croydon	2,476	95	1,290	1,559	1,251	1,913	1,676	2,243	1,519	2,971	2,012	77	1,891	73
Ealing	2,234	86	1,099	1,400	1,505	1,809	1,782	2,024	1,614	2,681	2,138	82	1,829	70
Enfield	309	12	965	816	600	480	452	280	410	371	543	21	523	20
Greenwich	2,464	95	4,300	2,208	1,889	2,830	2,045	2,233	1,853	2,958	2,454	94	2,523	97
Hackney	3,733	144	2,453	1,876	1,647	3,572	2,753	3,382	2,494	4,480	3,304	127	2,969	114
Hammersmith & Fulham	1,430	55	1,716	2,080	2,393	1,404	1,875	1,295	1,699	1,716	2,250	87	1,786	69
Haringey	970	37	30	15	2	643	414	879	375	1,165	497	19	499	19
Harrow	383	15	566	19	197	124	295	347	267	460	353	14	184	7
Havering	378	15	40	282	318	246	324	342	293	453	389	15	307	12
Hillingdon	5,461	210	1,877	4,178	5,021	4,599	5,345	4,947	4,842	6,554	6,415	247	4,924	189
Hounslow	4,926	189	3,549	3,791	3,331	4,121	3,806	4,463	3,449	5,912	4,568	176	4,192	161
Islington	2,684	103	1,552	2,091	2,268	2,547	2,587	2,431	2,344	3,221	3,105	119	2,483	96
Kensington & Chelsea	166	6	94	1,161	347	90	109	150	99	199	131	5	134	5
Kingston	772	30	767	1,329	1,052	755	912	700	826	927	1,094	42	913	35
Lambeth	3,368	130	2,567	4,309	4,356	3,217	3,952	3,051	3,580	4,042	4,743	182	3,719	143
Lewisham	1,214	47	473	201	131	892	563	1,100	511	1,457	676	26	722	28
Merton	380	15	57	265	428	283	404	345	366	456	485	19	347	13
Newham	3,345	129	5,660	6,078	4,877	4,016	4,165	3,031	3,773	4,015	4,998	192	4,396	169
Redbridge	1,093	42	1,123	894	748	1,006	845	990	766	1,312	1,014	39	979	38
Richmond	157	6	1,106	821	854	420	522	143	473	189	626	24	531	20
Southwark	1,981	76	6,538	6,381	6,025	3,354	4,180	1,795	3,787	2,378	5,017	193	4,144	159
Sutton	309	12	-	16	130	286	257	280	233	371	308	12	216	8
Tower Hamlets	5,693	219	5,201	5,910	5,629	5,754	5,792	5,158	5,248	6,832	6,952	267	5,817	224
Waltham Forest	280	11	419	367	270	296	259	254	234	336	311	12	303	12
Wandsworth	760	29	1,806	1,514	1,434	1,064	1,121	688	1,016	912	1,346	52	1,166	45
Westminster	6,136	236	4,645	2,925	2,951	5,816	4,503	5,559	4,079	7,365	5,404	208	4,938	190
Actual Total ¹	64,171	2,468	64,170	64,172	64,171	64,171	64,171	58,139	58,140	77,020	77,018	2,962	65,535	2,521
Total	64,171	2,468	64,171	64,171	64,171	64,171	64,171	58,140	58,140	77,019	77,019	2,962	65,534	2,521

¹ Results may not cast due to rounding.

4. GLA and Mayoral Serviced Accommodation Context

4.3 New Reports and Mayoral Ambitions

Comparison of Projections of Demand and Supply for Visitor Accommodation to 2036

- In April 2017, GLA Economics produced an updated working paper on their 2013 report (both reviewed previously). The headlines to be taken from this latest report (Paper 88) are:
 - The actual growth in visitor nights since 2013 was stronger than anticipated in the previous report (see table top right), whereby the total number of visitor nights was some 7.4% higher than expected in 2015.
 - In light of stronger than expected growth in visitor numbers, the projected number of net additional rooms required for London has increased in the more recent report, Paper 88 (from 159,346 rooms to 176,337 rooms in 2025, an increase of 10.7% over the 2013 estimate).
- This latest report reinforces the notion that such reports should be used as a guide only and that there should also be sufficient flexibility in assessing individual projects on their own merits and in light of actual performance trends in the marketplace.

A Tourism Vision for London

- On Friday 1 September 2017, the Mayor of London and Visit London launched a new vision for London, in which the capital's status as a world-class tourist destination is to be accelerated. The initiative, *A Tourism Vision for London*, is backed by over 100 industry partners and makes four recommendations:
 - Invest in more pre-visit promotion to attract more first-time visitors and boost the numbers travelling in off-peak periods.
 - Invest in information and visitor experiences to allow people to explore more of the city.
 - Ensure London can sustain and accommodate growing numbers of visitors through investment in cultural infrastructure, improving visitor amenities and harnessing digital technology.
 - Develop the infrastructure for business visits to ensure the city remains attractive for event organisers and delegates.
- Research undertaken by London & Partners and Google shows that London is the most searched for global destination for city and short breaks, and the new initiative is to facilitate the conversion of this proven interest into visits to and stays in the city. Thus, it is critical that more accommodation is developed and opened in the capital in order to meet the objectives of the *Tourism Vision for London*. Furthermore, during his launch speech, the Mayor reiterated that a key pillar of the vision is to inspire visitors "to find hidden gems off the beaten track", which would apply to the area around Stratford.
- In terms of targets, the Mayor's vision was to increase the total number of visitor arrivals by 30% over the next few years, from circa 31.2m visitors (domestic and international) in 2016 to more than 40m by 2025. This compares to the above GLA Economics' projection by 2025 of 36.6m visitor arrivals (the total of 21.1m international and 15.5m domestic visitors). It is therefore evident that the tourism targets for London are fluid, but the intention is clearly to grow London as a tourism destination, and to achieve this more hotel rooms will be required in order to facilitate growth and ensure that London maintains its world-leading status. As such, hotel supply growth may need to be even higher than that envisaged in the latest GLA Economics' estimates and the city should be ready to respond to market dynamics in order to ensure that the vision has a realistic chance of being achieved.

Comparison of GLA Economics Projections

Year	Previous Paper (2013)	Current Paper	Variance	% Change
Total Visitor Nights (Central Case Projections)				
2012	121,146	121,944	798	0.7%
2015	128,906	138,484	9,578	7.4%
2020	141,841	151,929	10,088	7.1%
2025	154,775	162,661	7,886	5.1%
2030	167,710	173,392	5,682	3.4%
2035	180,644	183,906	3,262	1.8%
2036	183,628	185,985	2,357	1.3%
Total Serviced Accommodation Supply Projections				
2012	131,598	136,412	4,814	3.7%
2015	146,326	145,737	-589	-0.4%
2020	152,836	165,845	13,009	8.5%
2025	159,346	176,337	16,991	10.7%
2030	165,856	186,828	20,972	12.6%
2035	172,366	197,319	24,953	14.5%
2036	173,668	199,417	25,749	14.8%

Source: GLA Economics

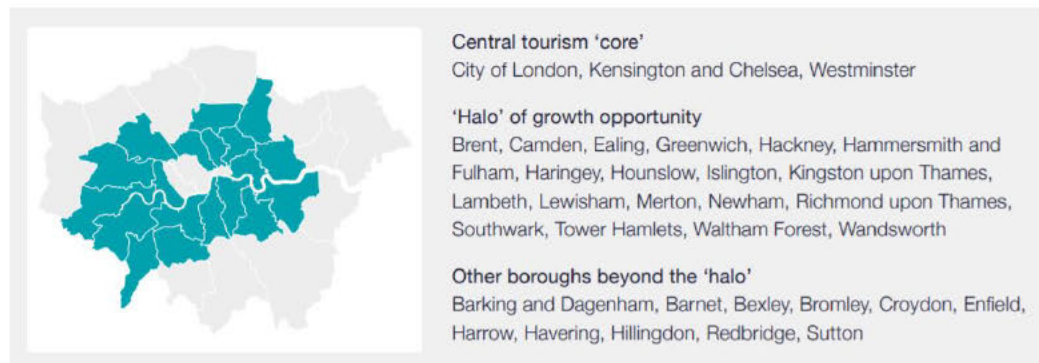


4. GLA and Mayoral Serviced Accommodation Context

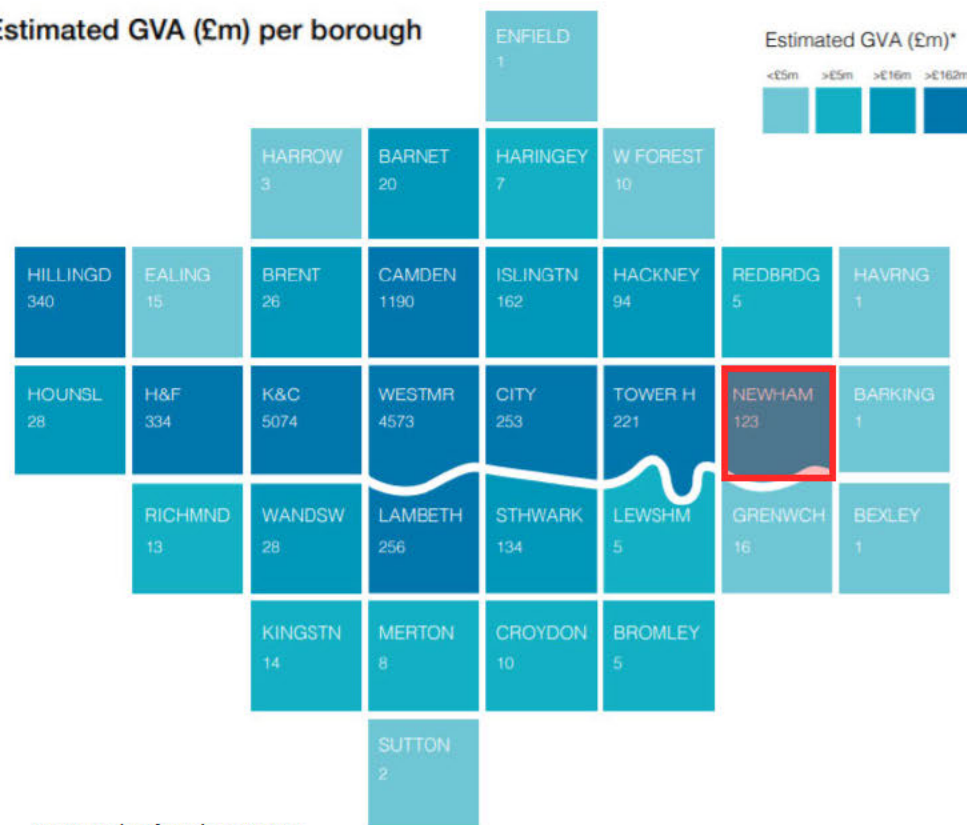
4.3 New Reports and Mayoral Ambitions

Tourist Information – Mapping the Local Value of International Visitors

- In support of the Mayor's *A Tourism Vision for London*, in May 2019 London First published a paper entitled *Tourist Information – Mapping the Local Value of International Visitors*, which produces visualisations of where and when international visitors spend whilst in London and assesses the economic contribution of international tourism at a borough level. Here below are some key extracts from this publication.
 - "As the UK looks to leave the EU, it is more important than ever that we build on" London's success as a leading international tourist destination: "encouraging visitors to stay longer, explore further afield, and discover what the whole of the capital has to offer".
 - Visitor numbers are projected to hit 40m by 2025.
 - "There is a huge opportunity if visitors can be encouraged to stay longer and explore the capital's varied and unique neighbourhoods, as well as our best-loved attractions – or to make a repeat visit and venture off the well-trodden tourist trail."
 - LBN is within the 'Halo' of growth opportunity (see graphic top right) and lies on a clear axis of boroughs that achieve relatively high estimated levels of GVA – being in similar company to the Hounslow (where Heathrow is located nearby), Wandsworth and Southwark (see graphic bottom right).
 - "70% of international Airbnb guests stay in the Halo zone". This clearly demonstrates a strong need for overnight accommodation within this zone, which includes LBN.
 - "To achieve the Mayor's Tourism Vision Good Growth goals means growing the international tourist market not only for central London, but also for the surrounding halo of growth opportunity. That means taking a much more intelligent, data-driven approach to investments in promotion, tourism infrastructure and local events" – all of which apply for this project under consideration.



Estimated GVA (£m) per borough



Source: Tourist Information, May 2019



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5. Site Assessment & Review of Concept

5.1 Site Characteristics

Location

- The site, 190-194 High Street, is not located in a conservation area and there are no listed buildings nearby. It lies within the LLDC Local Plan Site Allocation SA3.4 (Greater Carpenters District), which notes a potential for mixed-use development. Currently, the site is occupied by two three-storey terraced buildings, housing commercial uses at street level and residential uses above. The site is bounded to the north by open ground (the playground of Carpenters Primary School), to the southwest by Apollo Court, to the northeast by Holiday Inn Express Stratford and to the southeast by High Street.

Access

- The site has a Public Transport Accessibility (PTAL) rating of 6b ('Excellent'), given its proximity to the major transportation hub of Stratford (to the northeast) and Pudding Mill Lane DLR Station to the southwest (each five minutes walk).
- The nearest bus stop is outside Travelodge London Stratford (some 100m to the northeast) and is served by multiple routes: #25 (from Hainault to City Thameslink Station); #276 (Newham University Hospital to Stoke Newington Common); #425 (Hainault Street to Kenninghall Road); D8 (Stratford to Isle of Dogs); N8 and N25 (Hainault to Oxford Circus).
- The site is easily accessible by car and fronts a cycle superhighway. High Street links Stratford to Whitechapel and the City and City Fringe to the east. High Street becomes the retail street of Broadway to the northeast and continues on as Romford Road.

Visibility

- The existing buildings and street frontage look very dated compared to their neighbours and other nearby buildings along High Street and are not in harmony with their surroundings, looking somewhat out of place.
- The proposed redeveloped would address the foregoing issues and realise a much more modern and appropriate structure.
- Visibility from High Street is excellent and the outlook from the new structure will be either to the north over the school playground or southeast over High Street (both potentially appealing views).

Proximity to Demand Generators

- As previously discussed, the site is situated close to Stratford and the Queen Elizabeth Olympic Park, both subject to ongoing intensive regeneration. As such, the proposed aparthotel should benefit directly from the on-going levels of investment and regeneration in the local area, making it a highly attractive overnight/accommodation option for both corporate and leisure demand.
- The proposed project will also provide much needed over-night accommodation for visitors to the area and should fill a gap in the current profile of such accommodation provision (see next section for more analysis).

Site Location Plan – Adjacent and Nearby Land Uses



Hotel Uses

- 1 Project Site
- 2 Holiday Inn Express Stratford

Educational Uses

- E Carpenters Primary School

Residential and Related Uses

- A Waterworks River apartment complexes and Halo Tower
B One Eighty Stratford and Apollo Court (with Anytime Fitness Stratford at Ground Level)
C Aspire Point
D various residential blocks with Ground Level retail and religious venues

Adjacent and Nearby Land Uses

- The map above shows the range of adjacent and nearby land uses around the site. It is evident from this map that there is already a hotel in the vicinity, indeed entirely adjacent to the project site. A Travelodge is also nearby as are various other accommodation providers (according to Google Maps and Booking.com – the competitive environment is reviewed in more detail in a later section).
- The most predominant nearby uses are residential and educational, with some modest street-level retail on the ground floors of some buildings, but certainly not all buildings.

5. Site Assessment & Review of Concept

5.1 Site Characteristics



Project site

Residential with some street level retail

Residential with street level commercial units (The Hub Stratford, The Wave)

Residential with some street level retail

Apollo Court with street level entrance to Anytime Fitness Stratford

Streetscape Opposite Project Site



Residential

180 Stratford (residential)

Apollo Court and Anytime Fitness

Project Site

Holiday Inn Express Stratford

Aspire Point (residential)

Travelodge London Stratford

Residential

Streetscape Around Project Site



5. Site Assessment & Review of Concept

5.2 Review of Concept

Proposed Project

- The proposal is to construct a mixed-use scheme incorporating an aparthotel concept (C1 Class Use) and seven residential units (C3 Class Use), summarised in detail below:
 - Ground Floor:** common entrance and lobby to both the aparthotel and residential components; mixed-use lobby concept will serve as a reception area and offer a Grab+Go kiosk for residents of the building; appropriate back-of-house areas (including back-office space, storage and some technical areas); relevant cycle storage.
 - 1st to 8th Floors:** aparthotel keys, see table right.
 - 9th to 11th Floors:** residential units, see table right.
 - Roof:** appropriate plant areas, set back to reduce visibility.
- The project aims to cater to the needs of visitors to the Stratford area and the many attractions and events at the Queen Elizabeth Olympic Park and to displaced demand (ie those consumers that are perhaps more price sensitive and yet need easy/quick access to the centre) from the City and central London. It will achieve this by offering facilities and services to meet their specific requirements – especially the need for a good quality aparthotel in an easily accessible location. It will bring significant public benefit through the creation of valuable employment opportunities.

Benefits of the Project

- In view of the facilities and range of services that will be available at the project, we consider that it will be a genuine aparthotel (included a manned reception area and vending area for guests).
- Guests using the project will drive additional economic benefits to the local economy and community through expenditure on local retailing, restaurants, bars and services.
- VFR visitation due to local population growth (also a notably youthful demographic) should be significant in this location for this type of product and the operators envisaged for the project are specialists in the leisure segment.
- The Applicant has been in discussions already with a number of potential aparthotel operators. Such improvement to the area is in line with the Mayor's and the borough's policies, which seek to maximise the potential of sites and to improve the public realm.

Analysis of Room Inventory - 190-194 High Street, Stratford

	Number of Keys			Area by Key Type (sqm)		
	Studio	1-bed	Total	Studio	1-bed	Total
By Floor						
Ground Floor	-	-	-	-	-	-
1st Floor (C1 Hotel)	3	-	3	79	-	79
2nd Floor (C1 Hotel)	6	-	6	160	-	160
3rd Floor (C1 Hotel)	6	-	6	160	-	160
4th Floor (C1 Hotel)	6	-	6	160	-	160
5th Floor (C1 Hotel)	6	-	6	160	-	160
6th Floor (C1 Hotel)	6	-	6	160	-	160
7th Floor (C1 Hotel)	6	-	6	160	-	160
8th Floor (C1 Hotel)	6	-	6	160	-	160
Subtotals (C1 Hotel)	45	-	45	1,200	-	1,200
Averages (C1 Hotel)				27		27
9th Floor (C3 Residential)	-	2	2	-	157	157
10th Floor (C3 Residential)	-	2	2	-	140	140
11th Floor (C3 Residential)	-	3	3	-	150	150
Subtotals (C3 Residential)	-	7	7	-	447	447
Averages (C3 Residential)					64	64

Source: Maccreanor Lavington

Proposed Key Inventory

- The table above shows the project will provide a relatively consistent C1 Use aparthotel product (all being large studios units, averaging 27sqm, which is relatively standard for a regular aparthotel concept, and should meet the needs of visitors to the area owing to its likely attractive pricing and excellent location).
- The C3 Use residential apartments are vary more in size, ranging from 50sqm (for the one-bedroom units) to over 78sqm (for the two-bedroom units). Thus, offering a range of appropriate accommodation for the location.
- All 52 keys (C1 and C3 uses) will benefit from en suite facilities and natural light.

5. Site Assessment & Review of Concept

5.4 SWOT Analysis



Strengths	Weaknesses
<ul style="list-style-type: none">• Good visibility on High Street, a significant thoroughfare that connects Stratford to the City and West End• The project will be a purpose-designed aparthotel, which will appeal strongly to displace demand from the central of London• Excellent connectivity and access to transport links, including multiple nearby stations: Stratford (including Elizabeth Line and main line services) and Pudding Mill Lane DLR station• Located on the fringes of the Queen Elizabeth Olympic Park and all the attractions and events that occur within this enormous and highly successful Olympic legacy project (many consider it to be the best such legacy project in recent Olympic history)• Regeneration projects in the area include many new office premises, educational institutions and cultural attractions, all key drivers of overnight accommodation demand• Easy, quick access to the key business hubs of the City and Canary Wharf• Within easy walking distance of other major attractions, including Abba Arena and Westfield Stratford City• Situated in a borough with a very young average population that is expected to grow rapidly in the coming years (as highlighted by the high volume of residential development taking place in LBN), which will drive VFR demand and the need for more overnight accommodation	<ul style="list-style-type: none">• The site is quite small, but fit-for-purpose for the concept being proposed
Opportunities	Threats
<ul style="list-style-type: none">• Create an attractive aparthotel in close proximity to the strategic transport hub of Stratford, thus filling a gap in the market through the provision of a differentiated product• The appeal of Stratford and the Queen Elizabeth Olympic Park are expected to continue and to improve further as a result of ongoing development and regeneration, as well as enhanced transport links• LBN has a young and growing population, with significant price sensitive VFR traffic that will need such accommodation• Redevelopment of no longer fit-for-purpose buildings into a sustainable aparthotel development that will meet identified needs, whilst reinforcing the building frontage along High Street	<ul style="list-style-type: none">• Economic outlook remains uncertain for the UK and London in view of Brexit, which could result in the corporate activity slowing down and cause disruption to corporate demand in the short to medium term• Terrorists attacks may result in weaker demand, especially from leisure sources

Concluding Remarks

- The site enjoys a high visibility location on High Street and is strategically located in close proximity to Stratford and the Queen Elizabeth Olympic Park. Its proximity to key transportation links will provide easy access to more central locations and to some of London's leading tourist attractions (eg the West End which is only 15 minutes away on the Elizabeth Line).
- The site lends itself well to redevelopment into an aparthotel as the existing buildings are no longer fit for purpose and could be better exploited in line with the Mayor and the borough's policies of optimising the development potential of sites that will bring benefit to the community, in terms of jobs and improved public realm.
- The proposed concept appears to fill a gap in the marketplace, by providing sustainable employment opportunities in the strategic tourism sector in an aparthotel format.



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6. Competitive Environment

6.1.1 London – Existing Supply

Introduction

- At the end of 2022, London had approximately 168,618 hotel rooms of all categories (according to AMPM), of which 6,769 rooms (equivalent to 4.0% of total supply) were in LBN.

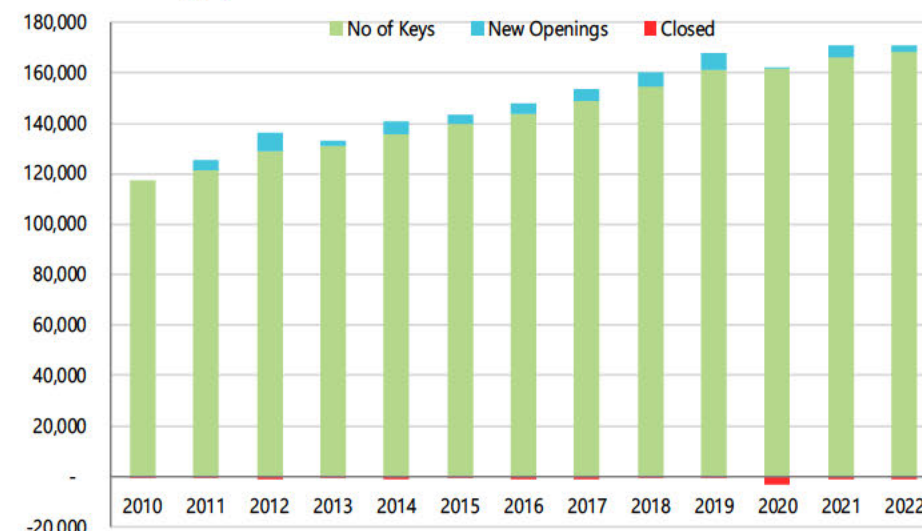
All London

- The graph top right shows the recent growth in supply in all hotel categories in all of London. The CAGR over the period 2010-2022 is estimated at around 3.1% per annum, which suggests that pre-C19 growth in overnight stays (reference Appendix 8.3, and estimated at around 4.4% per annum between 2010 and 2019) exceeded the rate of supply growth over the period pre-C19 and that new supply was fully absorbed.
- With regard to the graph top right, we would highlight the following:
 - Despite the recession, supply grew dramatically in 2012 (by around 7,300 rooms, net of estimated closures) because of London 2012 and the anticipated boost in demand that such a global event would produce for the city's hotel market.
 - In 2013, supply growth was muted (some 2,147 rooms), as developers waited to see how the new supply introduced in 2012 was absorbed.
 - With KPIs showing promising signs of recovery after 2012 and the slight hangover in 2013, developers and operators were able to advance projects and supply has been growing since 2014 (even in 2020, by around 400 rooms).

Supply by category

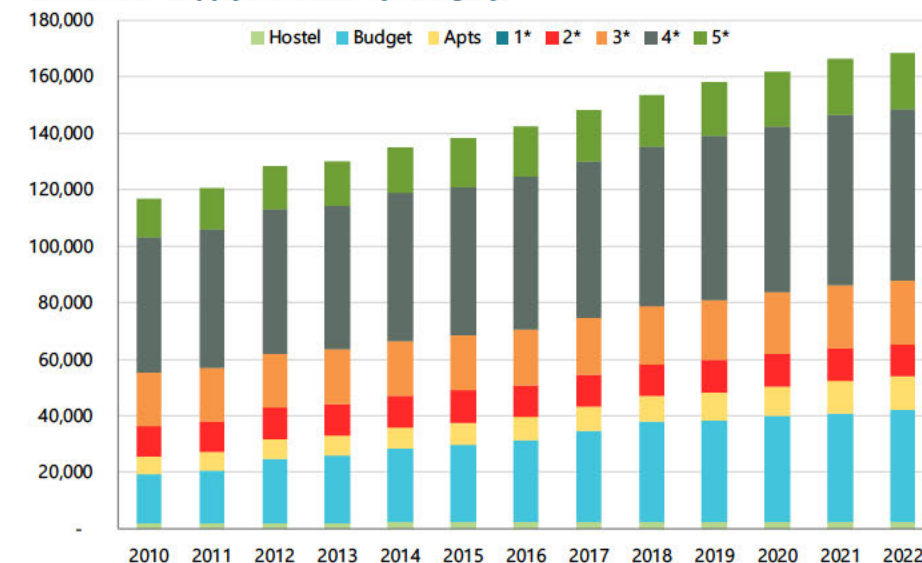
- The graph bottom right shows growth in room supply by category in 'All London' from 2010 to 2022 and we would highlight the following regarding the latest statistics:
 - In 2022, 4* hotels accounted for over 36% of total room supply, the second highest category was Budget (23.7%), followed by 3* at 13.4% (based on AMPM's latest categorisations of hotels).
 - In contrast, Hostels accounted for just 1.4% and Apartments (including serviced apartments and aparthotels) 6.9% of total room supply, suggesting that there is significant scope to increase supply within these two categories, especially in view of their growing popularity among millennial travellers whether for business, leisure or VFR purposes.
 - In terms of growth, Budget (CAGR 7.2%), Apartments (CAGR 5.3%) and 5* (CAGR 3.2%) expanded most rapidly over the time period analysed, albeit in the case of Apartments this was from a low base.
 - The categories with the slowest growth rates were 2*, 3* and Hostel, with CAGRs of 0.4%, 1.6% and 1.7% respectively.

'All London' Supply Evolution



Source: AMPM (2023)

'All London' Supply Evolution by Category



Source: AMPM (2023)

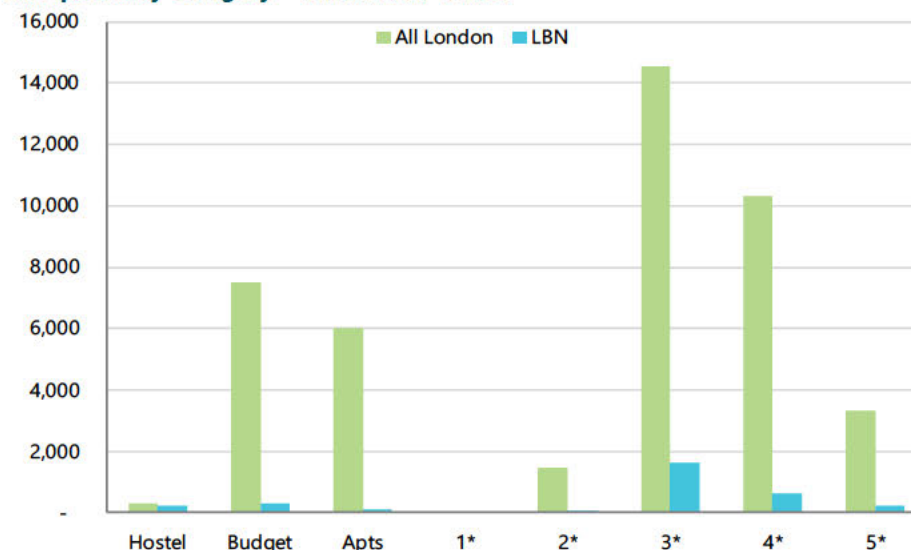
6. Competitive Environment

6.1.2 London – New Supply Pipeline

Analysis of 'All London' Pipeline

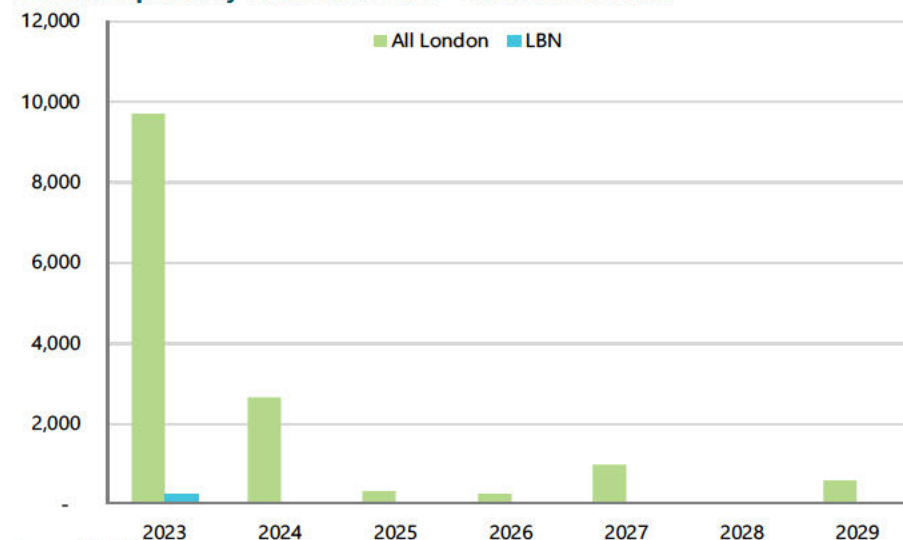
- AMPM maintain a database in respect of proposed new developments within the serviced accommodation sector in London. It is based on planning applications, construction activity, monitoring of media coverage of new developments and periodic verification of the status of entries in the database. Within the pipeline data there are five categories of status:
 - **In Construction:** projects that have started works and most likely to be completed within a specified timeframe.
 - **Final Planning:** projects that are approved or about to be approved and have a high likelihood of reaching fruition (may even have a due-by date against them).
 - **Planning:** projects that are in the planning process and may or may not go ahead.
 - **Deferred:** projects that are known to have been postponed for the time being.
 - **Unconfirmed:** projects which have been rumoured and explored as possibilities, but have not entered into a planning process.
- According to AMPM at the end of 2022, the pipeline for 'All London' included 43,451 rooms, with new supply in 2022 expected to be at a relatively modest level (compared to pre-C19) – less than 2,500 rooms expected to open. Some 4,500 rooms are thought to have opened in 2021, as delayed projects due to C19 come on line later than anticipated and London generally looked to exploit and consolidate its position as the third most visited city in the world.
- The chart top right compares the pipeline for 'All London' with that for LBN by type of accommodation category. We comment below:
 - The majority of new supply across London is expected to be 3* (over 33% of total new supply), followed by 4* (nearly 24%) and Budget hotels (over 17%), and very few new developments will be in the Hostel or 2* category.
 - Within LBN, the majority of new supply is expected to be within the 3* (over 53%) and 4* (nearly 20%).
- The table bottom right illustrates the pipeline with known 'Due' dates and we comment as follows:
 - Assuming there are in fact a total of 43,451 rooms in the total 'All London' pipeline, approximately 67% of those pipeline rooms are currently 'unscheduled' in terms of a development timeline, and therefore may not be realised (compared to circa 92% in LBN). It is therefore highly unlikely that all of the identifiable new supply will be realised in the short to medium term.

All Pipeline by Category – 'All London' v LBN



Source: AMPM (2023)

Selected Pipeline by Known Due Date – 'All London' v LBN



Source: AMPM (2023)

6. Competitive Environment

6.1.3 London – Performance Trends

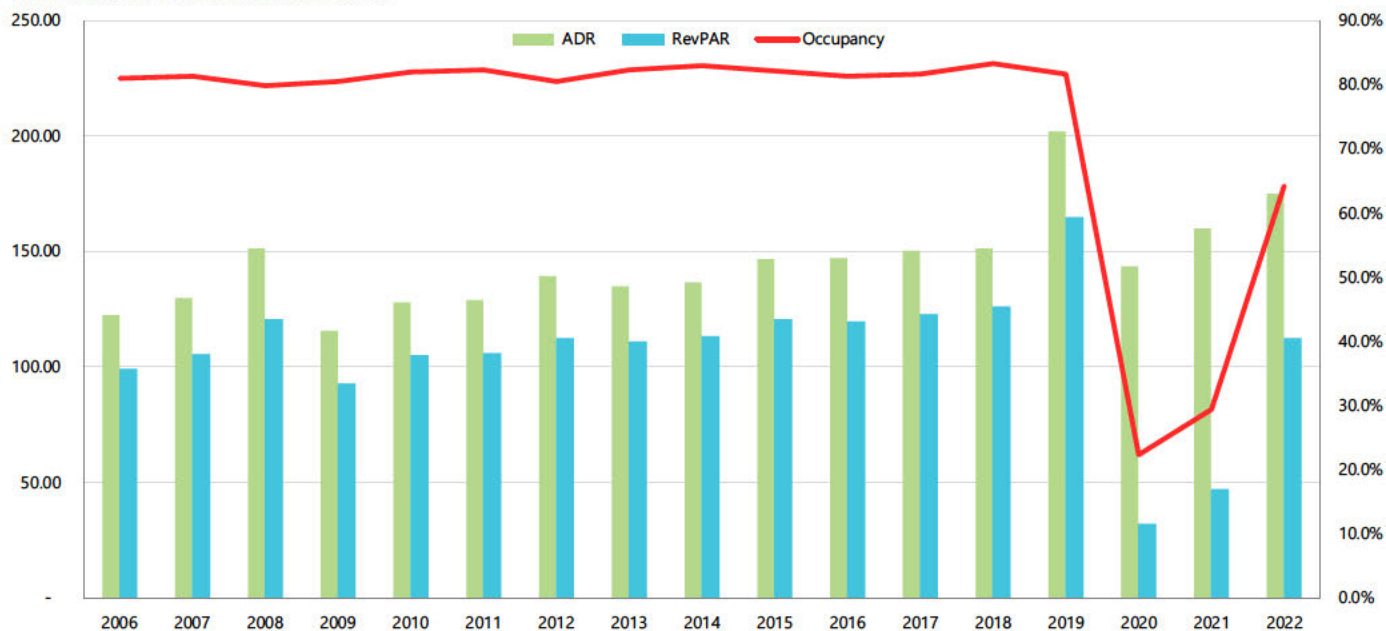
Introduction

- The graph below summarises data obtained from the EMEA Hotels Monitor series (published by Whitebridge Hospitality) and shows the performance of 'All London' over the period 2006 to 2022. We comment on the trends shown here below.

Occupancy

- Overall market occupancy was relatively stable over the period to and including 2019, at around or above 80%, in each of those 14 years, albeit there were noticeable dips in 2008 and 2012 for the following extra-ordinary reasons:
 - 2008 was due to the onset of the Global Financial Crisis (GFC), and as the world's leading financial centre, London was affected by the resultant drop in banking and finance activity.
 - 2012 was the year of the London Olympics and in the months ahead of the Games many visitors decided to stay away, believing that the city would be overly busy in the build-up to the Games in August 2012. Immediately after the Games, demand started to recover to more normal levels, but the year overall had already been negatively affected from an occupancy perspective.
- The data for 2020 shows clearly the dramatic impact of C19 on hotel demand, with occupancy levels collapsing to around 23% on average for the 12 months of 2020.

'All London' Performance Trends



Source: STR, HotStats and Whitebridge Hospitality research

Average Room Rate (ADR) and Revenue per Available Room (RevPAR)

- In terms of ADR and RevPAR, 2019 marked a high point for both metrics (although the sample base was changed in 2019 as HotStats data replaced STR data, with the former having fewer Budget hotels on its database). The previous high was in 2008, which was followed by a dramatic decline in 2009 following the full onset and repercussions from the GFC.
- Since 2009, both have been growing year-by-year, apart from a slight correction in 2013, when London's hotels felt the after-effects of London 2012.
- The slight decline in occupancy in 2016 was counterbalanced by strong ADR growth, resulting in a relatively stable RevPAR performance.
- The data for 2020 suggests that, to a great extent, hotel operators were able to maintain rate during the pandemic (at the visible expense of occupancy). However, the impact of such low occupancy levels is clear to see with RevPAR falling to around £34.
- Trends in 2022 were encouraging with both occupancy and ADR increasing as the capital embarked on a post-C19 recovery.

Concluding Remarks

- Under normal circumstances, demand for hotels in London is consistently strong, despite:
 - the very high growth in supply that has been witnessed in the last few years,
 - terrorist attacks,
 - financial crises, and
 - economic and political uncertainties (such as Brexit).
- Thus, the trends prior to the atypical 2020 (when occupancy levels were very high and ADR levels were either stable or growing) indicate very strongly that London is able to successfully absorb high levels of new supply and that this trend is likely to resume in a post-C19 environment (especially if offices become more like work hubs and workers move to live out of London, whereby such workers will require more well-priced short-stay accommodation within the city).

6. Competitive Environment

6.2.1 London Borough of Newham – Existing Supply

Introduction

- According to AMPM, there were 6,769 rooms in LBN in early 2023, which equates to circa 4% of 'All London's' total room supply.

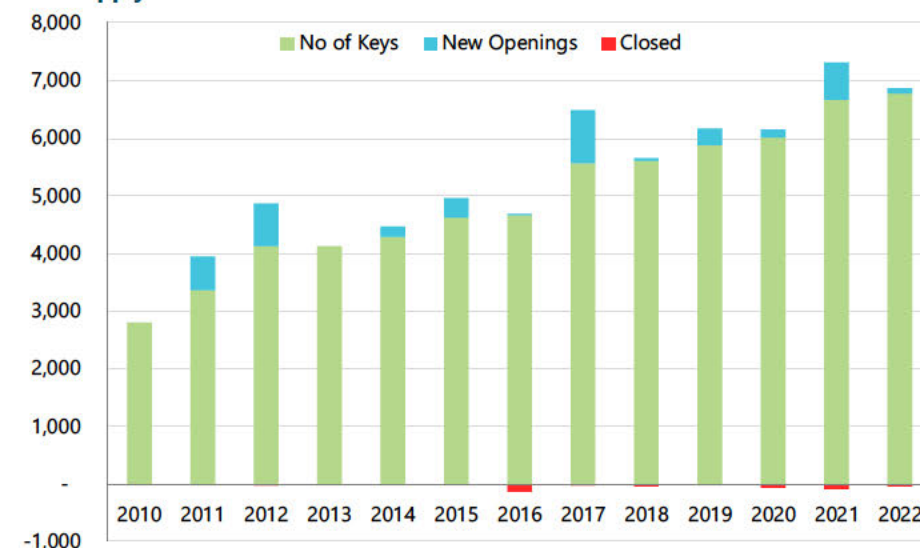
Evolution of Supply

- The graph top right shows the recent growth in supply and closures in all overnight accommodation categories in LBN. The CAGR over the period 2010-2022 is estimated at around 7.6% per annum, which is higher than for 'All London' overall. However, this is not surprising in view of the major transformation that has and continues to take place within the borough, as well as the fact that in 2010 LBN's share of supply represented only 2.4% of all rooms in London.
- With regard to the graph top right, we would highlight the following:
 - Despite the recession, supply grew dramatically in 2011 and again in 2012 (by around 550 and 780 rooms respectively) because of London 2012 and the anticipated boost in demand that such a global event would produce for the city's key Olympic borough.
 - Between 2013 and 2016, supply continued to grow, albeit more modestly, suggesting that new supply introduced in the build-up to 2012 was successfully absorbed and that developers were keen to continue to build and open new hotels.
 - In 2017 and 2021, supply received major boosts with 863 and 691 rooms opening respectively.
 - Since 2016 there have been regular annual hotel closures, however, the volume of new supply has more than compensated for such losses, with supply overall growing annually.
- Such growth would indicate that developers remain keen to capitalise on the success of existing and future regeneration schemes in LBN, especially within the dynamic Stratford area.

Supply by Category

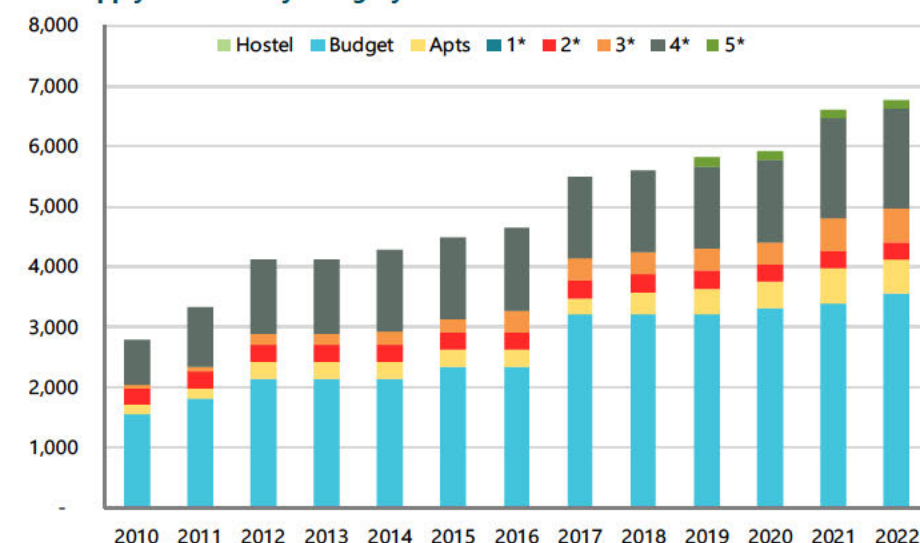
- The graph bottom right shows the growth in supply by category in LBN between 2010 and 2022. We highlight the following:
 - In 2022, the dominant Budget hotel category accounted for 52.5% of total rooms supply, followed by 4* (24.5%) and Apartments (8.4%), while 2* represented only 4.3% of total room supply in the borough. There are no Hostels in LBN and only one 5* hotel.
 - In terms of growth, 3* witnessed the highest growth (with a CAGR of 20.8%) and Apartments were second place, albeit from a very low base (11.9%).
 - The Budget and 4* segments grew by CAGRs of 7.1% and 6.8% respectively.

LBN Supply Evolution



Source: AMPM (2023)

LBN Supply Evolution by Category



Source: AMPM (2023)

6. Competitive Environment

6.2.2 London Borough of Newham – Anticipated Changes to Supply

Introduction

- According to AMPM data in early 2023, there were 22 new development projects, with a total of 3,001 rooms, proposed within LBN, as shown in the table right and on the map overleaf. Of these:
 - Only two projects, with a total of 98 rooms (equivalent to 3.3% of total new supply in the borough), fall within the Apartment category, which is the category envisaged for the project under consideration.
 - Only one of these projects (with 62 rooms) is confirmed and due to open soon (listed as 'A' in the table right).
 - The other Apartment project is still in Final Planning and does not have a confirmed opening date and may never come to fruition.

Pipeline Supply Analysis – All Accommodation

- Analysing LBN pipeline supply more closely, it is evident that the projects currently listed have a mix of statuses:
 - In Construction:** 147 rooms
 - Final Planning:** 785 rooms
 - Planning:** 1,330 rooms
 - Deferred/Unconfirmed:** 739 rooms
- Of the above statuses, it is highly unlikely that all of the Planning and Unconfirmed projects will come to fruition in the medium to longer term. Indeed, only one project has a firm opening date (the other identified hotel due to open in 2023 seems unlikely as it is also categorised as Deferred) within the next four years and therefore has a strong likelihood of opening as an operational establishment.

Pipeline Supply Analysis – Relevant to the Project under Consideration

- Of the identified pipeline, 10 are located in the Stratford area and thus of possible relevance to the project, of which only one is an Apartment. With regard to these projects, we would highlight:
 - Broadway Aparthotel:** located on the main shopping street and approaching completion. To be operated as a YotelPad.
 - Ibis London Stratford:** possible extension to existing hotel, although based on site inspection it is not clear where such expansion could take place.
 - Stratford Centre & The Yards:** involving demolition of an old office building and redevelopment of a large site adjacent to Stratford Centre. No progress on site currently and numerous applications have been refused.
 - Travel Inn:** name may be inaccurate and probably part of Hotel DC, which appears to comprise two buildings currently.
 - 6-7 Park Lane:** site situated behind Travelodge London Stratford and within Carpenters Estate. Seems like an unlikely site for a new standalone hotel.
 - Carpenters Estate Hotel:** no site has been identified, but the regeneration of Carpenters Estate may well include a hotel in the long term. Research indicates the regeneration of this residential quarter is many years away.

Pipeline in LBN (2023)

Map Ref	Project Name	Opening	Status	Category	Bedrooms	Post Code
A	Broadway Aparthotel	2023	In Construction	Apts	62	E15 1NG
B	Sunborn London Yacht Hotel		In Construction	4 Star	85	E16 1AA
C	Dockside Apartments @ Excel		Final Planning	Apts	36	E16 2FQ
D	Hampton By Hilton London Docklands		Final Planning	Budget	10	E16 2QT
E	High Street North		Final Planning	3 Star	89	E6 2HJ
F	ibis London Stratford		Final Planning	Budget	77	E15 4LJ
G	Stratford Centre & The Yards		Final Planning	3 Star	299	E15 2RH
H	The Old Spotted Dog		Final Planning	3 Star	68	E7 9NP
I	Travel Inn		Final Planning	2 Star	6	E7 9HL
J	Visitors Center Hotel Silvertown		Final Planning	5 Star	200	E16 2PX
K	6-7 Park Lane		Planning	3 Star	43	E15 2JG
L	Best Western East Ham		Planning	3 Star	101	E6 1DQ
M	Carpenters Estate Hotel		Planning	3 Star	191	E15 1AU
N	Holiday Inn Express London Excel		Planning	Budget	96	E16 2FQ
O	Millennium Mills 1		Planning	Budget	100	E16 1UR
P	Millennium Mills 2		Planning	4 Star	100	E16 1UR
Q	New Railway Hotel		Planning	4 Star	412	E15 1DB
R	The Collective Stratford		Planning	3 Star	287	E15 1AJ
S	City View Hotel - Stratford		Deferred	2 Star	6	E15 3HU
T	Hampton by Hilton	2023	Deferred	3 Star	183	E3 3TT
U	Sugar House Island Hotel		Unconfirmed	3 Star	350	E15 2
V	YHA London Stratford		Unconfirmed	Hostel	200	E15 1BB
Total Pipeline Rooms					3,001	

Source: AMPM (2023)

- New Railway Hotel:** there is an existing pub with rooms and a vacant site opposite, but neither appear to be advanced for future hotel development.
- The Collective Stratford:** would have been a residential development in any event, but based on research the developer Dominus is planning student residential on the site.
- City View Hotel – Stratford:** very dated hotel, bounded on all sides by adjoining buildings. Not clear where such expansion would take place.
- Sugar House Island Hotel:** Sugar House Island is a major mixed-use regeneration project, including residential, office and retail uses. Based on site inspection, no sign of any hotel project (and such use not listed on estate's entrance signage).
- YHA London Stratford:** the site is under development as 30 residential apartments. The YHA concept is not being realised.
- Based on the foregoing, the only genuine competitor to the project under consideration is the new YotelPad. Most of the remaining pipeline appears unlikely to ever reach fruition, indicating more projects of greater certainty will be required in the area of Stratford.

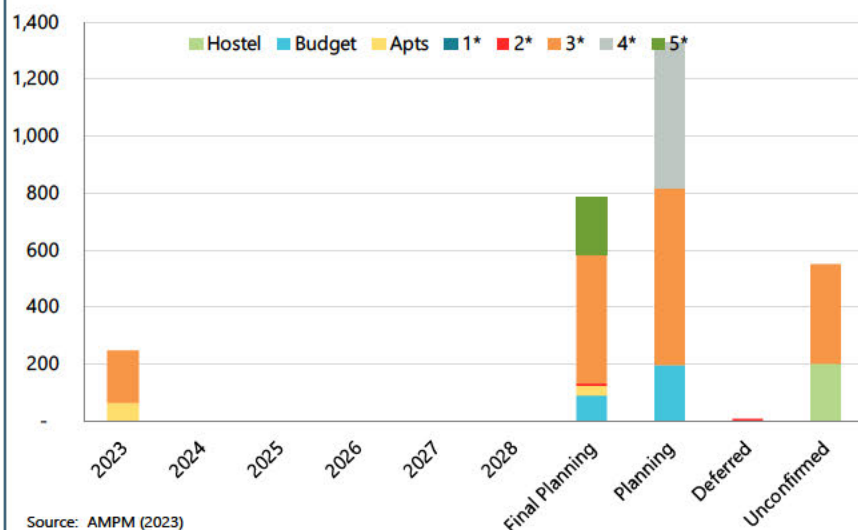
6. Competitive Environment

6.2.2 London Borough of Newham – Anticipated Changes to Supply

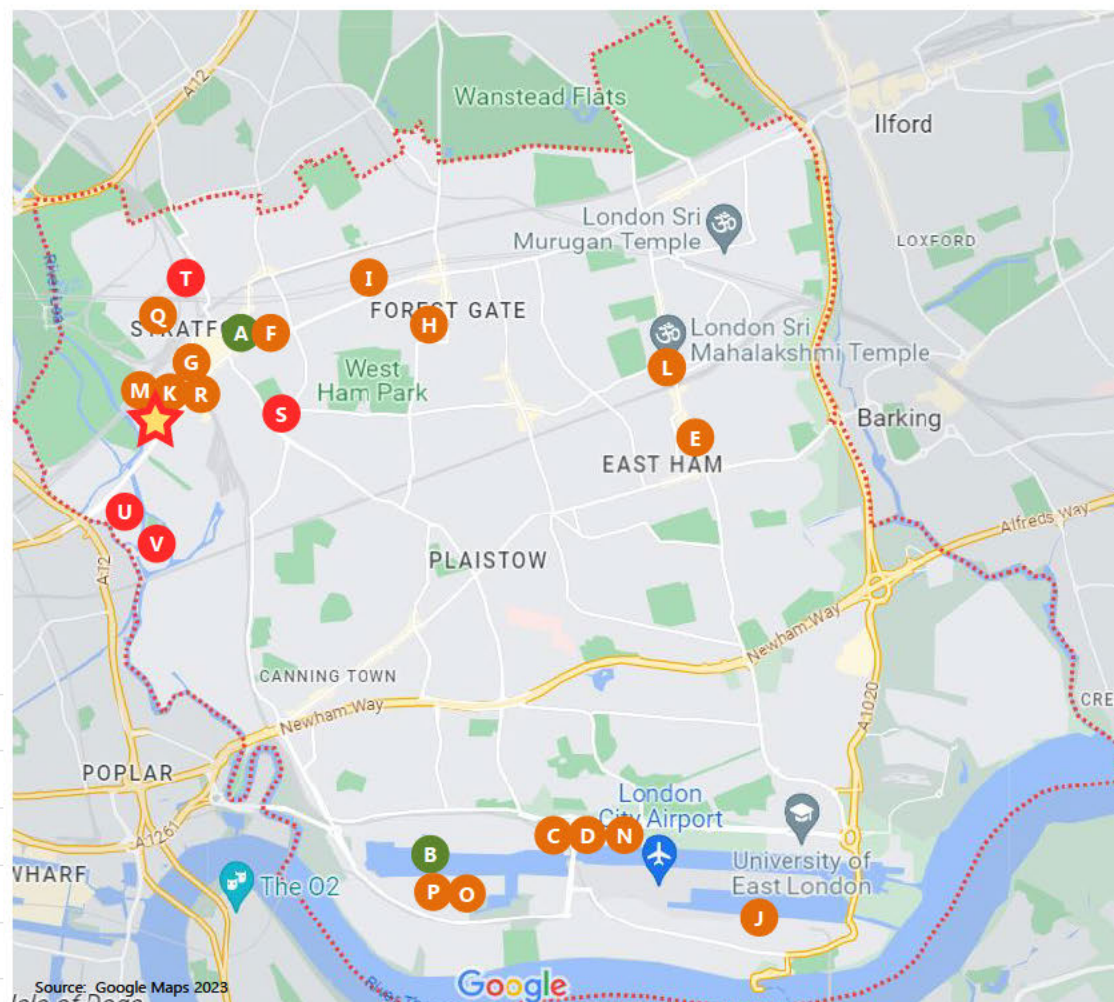
Pipeline Mapping

- The map right illustrates the location of the pipeline projects in LBN as identified by AMPM. Projects marked in:
 - GREEN:** those In Construction.
 - AMBER:** those in Final Planning or Planning.
 - RED:** those which are Deferred or Unconfirmed.
- The star highlights the project hotel site. Interesting to note that the project is currently not listed by AMPM.
- It is unsurprising that the majority of LBN pipeline supply is concentrated in either the Stratford or around Royal Docks, which are amongst the most dynamic and developing parts of London.
- Thanks to its major transport hub status, it is clear that Stratford is a particularly attractive location for accommodation development, further underpinned by its emerging status as a cultural hub and major tourist draw..

All LBN Pipeline by Category (2021)



All LBN Pipeline (2021)



6. Competitive Environment

6.3.1 Relevant Supply Analysis – Existing Supply

Introduction

- At the end of 2022, LBN had an estimated 6,769 rooms, of which 570 rooms were categorised as Apartments. For the purposes of identifying a relevant competitive environment, we have taken into account only those properties in close proximity to the project site under consideration and (given the low number of Apartments) considered all categories.

Supply Analysis

- The table below and map overleaf show clearly that there are very few genuine aparthotels (those operating in C1 Class Use classified premises) within or close to Stratford. We have identified just three properties within this competitive environment, offering a total of 359 rooms (we would excluded Marlin Apartments Stratford from this total as these units are clearly C3 Residential Class Use).
- Given the enormous popularity of London as a business and tourist destination, it is evident that London needs more visitor accommodation. As Stratford develops further and expands, the project would not only create an excellent branded aparthotel for this part of London (which is under-supplied with such accommodation) but also fill a need.

Summary of Competitive Environment - Stratford, London Borough of Newham

Map Ref	Hotel Name	Location	Branding/ Operator	Star Grading	Rating bk ing.com	Rating Tripadv.	Number of Rooms	Number of Suites	Suite Ratio	Total Keys	Restaurant / Bar	Meeting Facilities**	Other Facilities	Key Sizes (sqm)		
														Room	Suite	Largest Suite
Limited Service Hotels - unbranded																
1	Cart & Horses (no rooms)	north	-	2*	-	40 of 162	-	-	#DIV/0!	-	1/1	-	-	-		
2	City View	south	City View	2*	4.4 - disappointing	1,115 of 1,211	19	-	0%	19	1/-	-	-	20		
3	Forest View (closed)	east	-	2*	-	789 of 1,211	-	-	#DIV/0!	-	1/1	-	-	-		
4	Lodge 51 (closed)	east	-	2*	-	-	-	-	#DIV/0!	-	-	-	-	-		
5	London Olympus	east	Oyo	2*	6.8 - pleasant	1 of 1	24	-	0%	24	1/1	-	-	18		
6	Travel Inn (Hotel DC)	east	-	2*	-	-	27	-	0%	27	-	-	-	-		
7	Viking Hotel	east	-	2*	7.7 - good	819 of 1,211	61	-	0%	61	1/-	-	-	18		
8	Bay Tree Hotel	east	-	3*	-	1,112 of 1,211	16	-	0%	16	-/-	-	-	20		
9	Epsilon Hotel	east	-	3*	7.4 - good	684 of 1,211	36	-	0%	36	1/-	-	-	20		
10	Stratford Hotel	east	-	3*	7.0 - good	-	10	-	0%	10	-	-	-	20		
11	The Westbridge	south	-	3*	8.2 - v good	257 of 1,211	73	8	10%	81	1/1	-	-	22	26	28
							266	8	3%	274						
Lmited Service Hotels - branded																
21	Holiday Inn Express Stratford	south	IHG	Budget	8.4 - v good	4 of 13	153	-	0%	153	1/1	5 (50)	-	18	-	-
22	Ibis Stratford	east	Accor	Budget	7.8 - good	504 of 1,211	108	-	0%	108	1/1	-	-	17	-	-
23	Moxy Stratford	north	Marriott	Budget	8.2 - v good	6 of 13	294	-	0%	294	1/1	-	-	17	34	34
24	Premier Inn Stratford	west	Whitbread	Budget	-	9 of 13	267	-	0%	267	1/1	-	-	17	-	-
25	Snoozbox Stratford	south	Snoozbox	Budget	8.0 - v good	608 of 1,211	80	-	0%	80	1/-	-	-	18	-	-
26	Travelodge Stratford	south	Travelodge	Budget	-	7 of 13	188	-	0%	188	1/1	-	-	17	-	-
							1,090	-	0%	1,090						
Full Service Hotels																
31	Hyatt Regency Stratford	west	Hyatt	4*	8.3 - v good	5 of 13	225	-	0%	225	1/1	6 (90)	gym	22	30	-
32	The Gantry	north	Hilton	4*	8.7 - fabulous	3 of 13	276	15	5%	291	3/1	-	gym	25	41	52
33	The Stratford Hotel	north	-	5*	8.6 - fabulous	2 of 13	139	6	4%	145	2/1	4 (25)	gym, spa	25	45	65
							640	21	3%	661						
Aparthotels																
41	Adagio Stratford	north	Accor	Apart	8.9 - fabulous	1 of 1	100	36	26%	136	-/1	-	gym	26	35	-
42	Hyatt House Stratford	west	Hyatt	Apart	8.7 - fabulous	8 of 13	80	45	36%	125	1/1	-	(shared w Hyatt Regency)	26	38	64
43	Marlin Apartments Stratford	north	Marlin	Apart	7.3 - good	53 of 468	77	34	31%	111	-	-	-	26	39	71
44	Roomzzz Stratford	south	Roomzz	Apart	8.5 - v good	1 of 13	98	-	0%	98	-	-	gym	18	34	50
							355	115	24%	470						
							2,351	144	6%	2,495						

** Number of rooms (capacity of largest room, theatre-style)

Source: Whitebridge Hospitality research

6. Competitive Environment

6.3.1 Relevant Supply Analysis – Existing Supply and Pipeline Projects

Map Ref Hotel Name

Limited Service Hotels - unbranded

- 1 Cart & Horses (no rooms)
- 2 City View
- 3 Forest View (closed)
- 4 Lodge 51 (closed)
- 5 London Olympus
- 6 Travel Inn (Hotel DC)
- 7 Viking Hotel
- 8 Bay Tree Hotel
- 9 Epsilon Hotel
- 10 Stratford Hotel
- 11 The Westbridge

Limited Service Hotels - branded

- 21 Holiday Inn Express Stratford
- 22 Ibis Stratford
- 23 Moxy Stratford
- 24 Premier Inn Stratford
- 25 Snoozbox Stratford
- 26 Travelodge Stratford

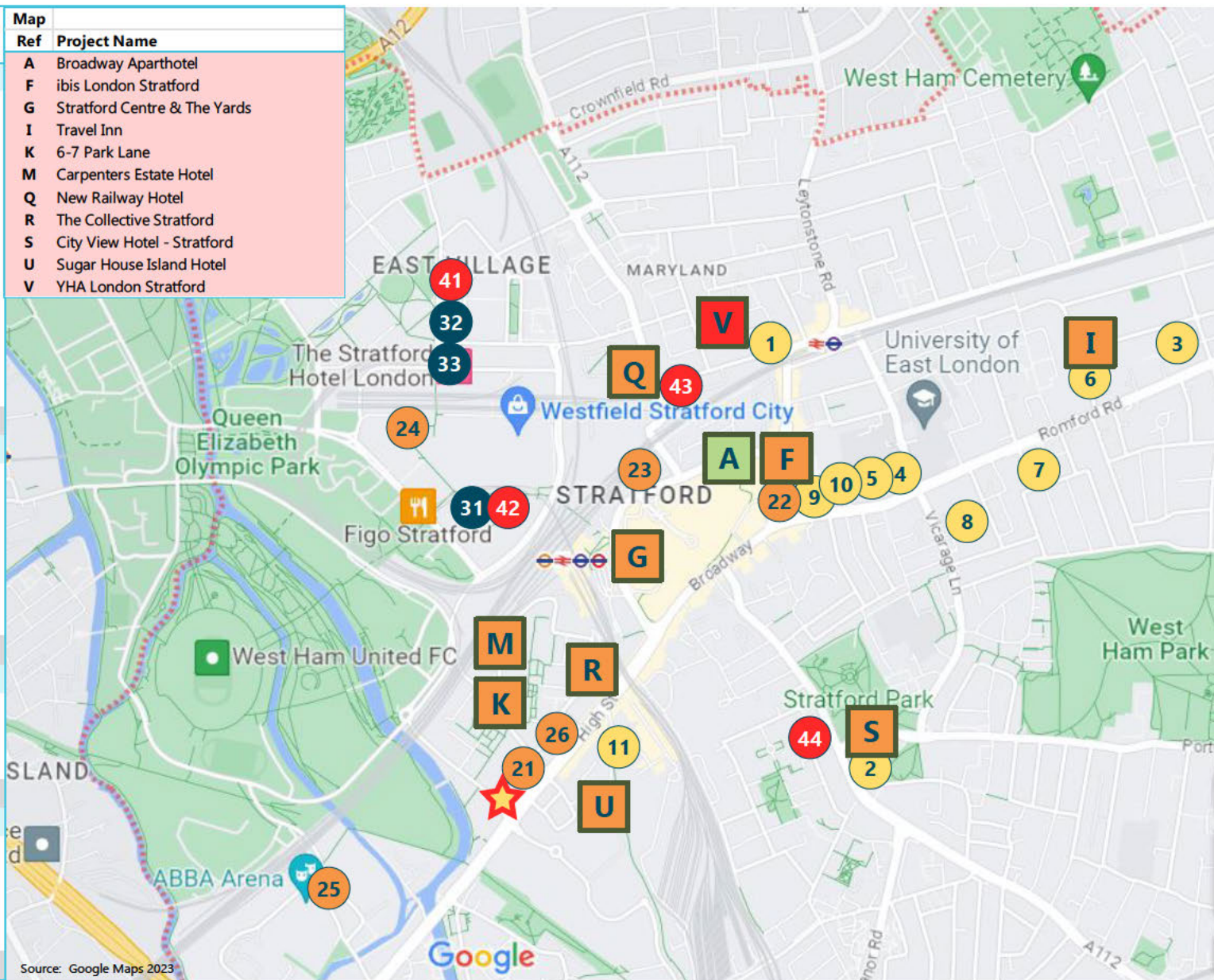
Full Service Hotels

- 31 Hyatt Regency Stratford
- 32 The Gantry
- 33 The Stratford Hotel

Aparthotels

- 41 Adagio Stratford
- 42 Hyatt House Stratford
- 43 Marlin Apartments Stratford
- 44 Roomzzz Stratford

Map Ref	Project Name
A	Broadway Aparthotel
F	ibis London Stratford
G	Stratford Centre & The Yards
I	Travel Inn
K	6-7 Park Lane
M	Carpenters Estate Hotel
Q	New Railway Hotel
R	The Collective Stratford
S	City View Hotel - Stratford
U	Sugar House Island Hotel
V	YHA London Stratford




Source: Google Maps 2023

6. Competitive Environment

6.3.2 Relevant Supply Analysis – Gap Analysis

Gap Analysis

- The matrix below illustrates the market positioning of the majority of hotel and Extended Stay products in the Stratford area of LBN. This shows that the hotel sector has a good cross section of hotel types by quality, with a heavy bias towards the lower, Budget, end of the range.
- Within the less mature Extended Stay sector, there are a limited number of options. When the Yotelpad opens there will be only three in the genuine Aparthotel segment and one that could be considered to be in the higher range of Hotel-cum-Aparthotel, that being the Hyatt House owing to its shared facilities with the full service Hyatt Regency hotel.
- This Gap Analysis clearly identifies an area of opportunity – between the full Aparthotel product and the more limited in terms of services and amenities Serviced Apartment segment. It is within this area that the Applicant is seeking to position their development (as outlined in the concept brief in Section 4). This new product will clearly fill a gap and a need in the Stratford area.

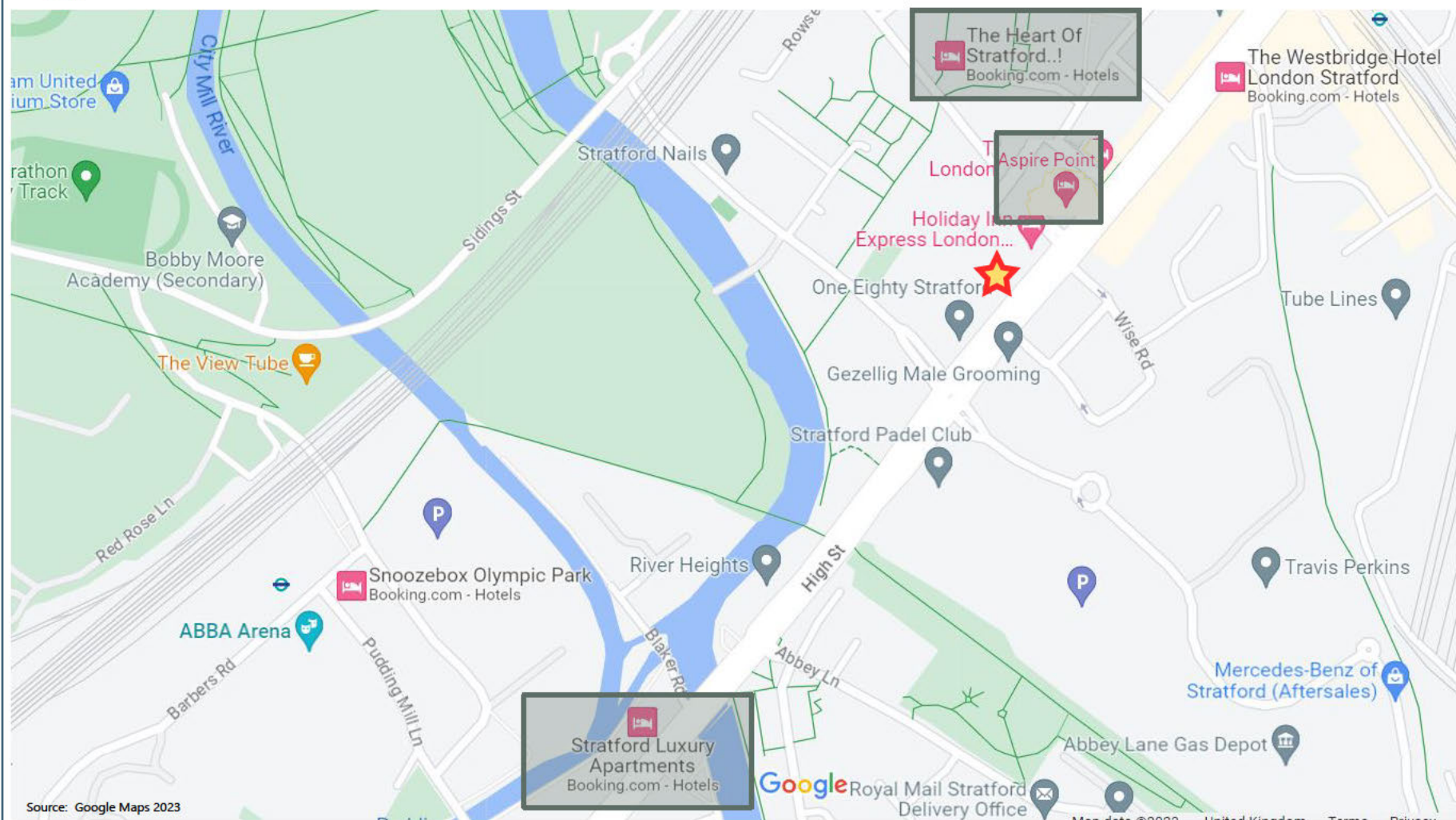
Quality	Hotel	Extended Stay	Segment
Luxury / Upper-upscale			Hotel / Aparthotel
Upscale / Midmarket (full service)	  	   <div data-bbox="1301 932 1817 1159" style="border: 2px solid red; padding: 10px; text-align: center;"> <p>Gap Opportunity</p> </div>	Aparthotel
Midmarket (select service) / Limited Service / Hostel	    		Serviced Apartment

6. Competitive Environment

6.3.2 Relevant Supply Analysis – Gap Analysis

Gap Analysis – Unrecognised Overnight Accommodation

- The map below highlights (in the GREY boxes) that there are many more venues providing overnight accommodation in the Stratford area which are not recognised by AMPM and are not considered hotel-related or aparthotel-related overnight accommodation. They are Residential C3 Class Use units that are promoting themselves as overnight accommodation options (via Google Maps, Booking.com, etc).
- The map serves to demonstrate the strength of need in the Stratford area for visitors to find overnight accommodation in this part of London.
- One of these venues are situated even further away from the heart of Stratford than the project site itself (and close to Snoozebox Olympic Park).



6. Competitive Environment

6.3.3 Relevant Supply Analysis – Recent Performance Trends

Introduction

- The graphs right summarise the performance of a sample of hotels (the vast majority of which are within the Stratford area of LBN). The 14 hotels and aparthotels within this analysis provided by STR are listed in Appendix 8.4.

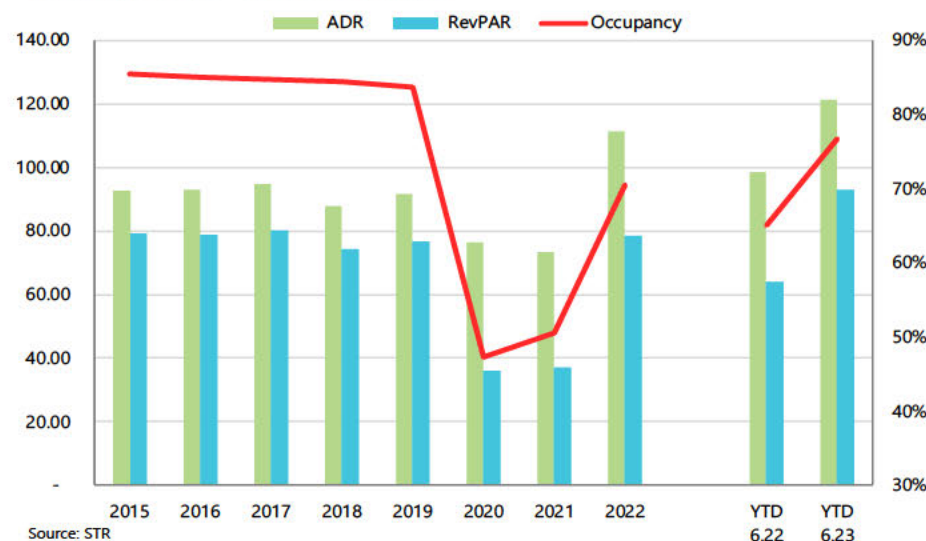
Annual Performance Trends

- The graph top right summarises the annual average performance of the sample and we comment as follows:
 - Occupancy levels were remarkably consistent between 2015 and 2019 (in the range of 83-86% per annum), albeit with a slight downward slope as several new hotels opened and such new supply was successfully absorbed. It is therefore clear that in this area of London demand was strong and is likely to increase further with the further regeneration projects underway and the anticipated halo effects of the new Elizabeth Line at Stratford Station.
 - Apart from a slight dip in 2018, ADR was relatively stable at around £93 per annum prior to 2020, demonstrating the robust nature of demand in Stratford despite significant increases in supply.
 - RevPAR is a factor of occupancy and ADR and closely emulates the trends identified above (with relatively stable levels of performance prior to 2020).
 - With the emergence of C19 in 2020, clearly Stratford was severely impacted, like most of the capital and wider UK. From the data, it is clear that hotel operators tried to maintain ADR, and achieved this to a degree, but at the detriment of occupancy, which fell to an annual average of just 47.3% in 2020 (which is higher than that reported for All London – further indicating the strength of demand in this part of London).
 - More recent data indicates that the Stratford market is recovering strongly, both in occupancy and, most particularly, in ADR (which breached £120 during the Year-To-Date to end of June 2023, YTD 6.23). This is clear evidence of the strength of demand and need for further accommodation in the Stratford area.

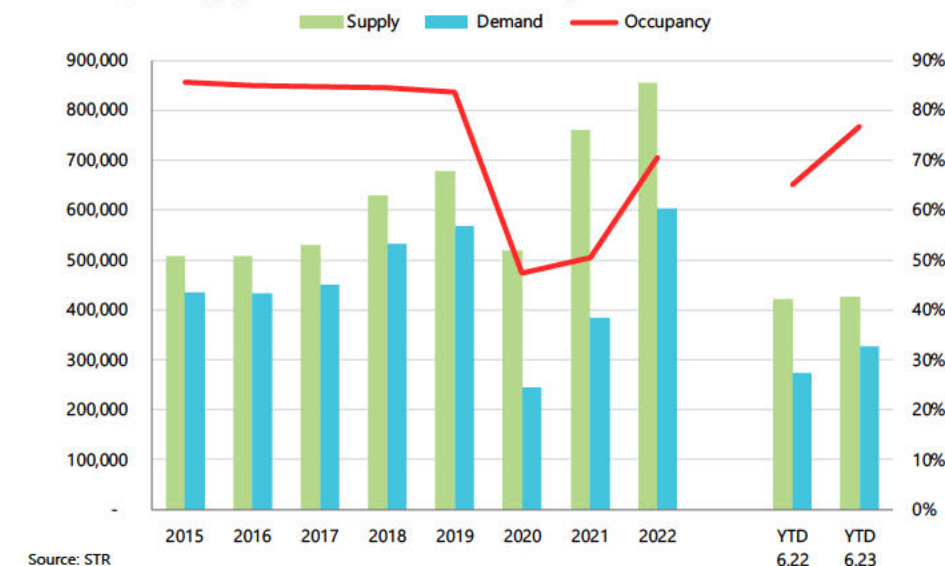
Supply v Demand

- The graph bottom right summarises the growth in both supply and demand within the sample under consideration and we would highlight:
 - The impact of C19 on demand is clear to see (with demand and occupancy declining dramatically in 2020), as is the strong recovery in recent years post-C19.
 - During the period 2015 to 2022, the growth in supply (CAGR +7.7%) was slightly higher than that in demand (CAGR +4.8%), as indicated by the slight downward trend in occupancy.
 - However, more recent data indicates that growth rates were reversed between YTD 6.22 and YTD 6.23 as demand growth (+19.2%) far exceeded growth in supply (+1.1%).
- The foregoing statistics and trends provide very strong evidence to support the desirability of this part of London for visitors to the capital, whereby despite high levels of new supply coming on stream, demand largely keeps pace with supply and occupancy levels remain very high and relatively stable (especially before 2020, when this sample's average occupancy was very similar to the 'All London' average at around 85%).

Summary of KPIs – LBN Hotel Sample



Summary of Supply v Demand – LBN Hotel Sample



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7. Future Demand Analysis

7.1 Overview of Consultants' Opinions

Introduction

- As identified previously, London's hotel market is traditionally very strong and performs well even in years when there are extra-ordinary circumstances that should have a major negative impact on performance (such as the multiple terror incidents in 2017).
- The last few years have been exceptional and were most likely a once-in-a-hundred-years event, whereby C19 brought the world to a standstill, including London.
- However, with reference to more recently published hotel trends data and a number of consultants' forecasts for London, here below we seek to consolidate the view that London is likely to resume its high levels of performance in the next few years and should maintain it again thereafter despite possible increases to supply.

Consultants' Forecasts

- The table top right is an extract from PWC's annual *UK Hotels Forecast* (published in September 2022), which highlights their thoughts on growth in hotel performance in London in 2023. It shows that despite increases in new supply in 2021 occupancy did show signs of recovery following the collapsed witnessed in 2020. From a low base of 46.1% in 2021, significant growth occurred in 2022 (to circa 72%) and further growth was expected through 2023 (rising to 77.7% by year-end, assuming the mild scenario, which seems most likely given recent data).
- Recently, STR and HotStats indicated that RevPAR across Europe (within which London is the most significant market) could recover to pre-C19 levels by Q3 2023. With a cheaper Pound likely for some time longer, London is expected to recover from C19 and the city's stakeholders to take up the call of the Mayor to achieve his new targets for tourism (see box bottom right).

Tourism Forecasts

- According to analysis undertaken by the World Travel & Tourism Council (WTTC) in collaboration with Oxford Economics (published in April 2023), global travel and tourism is forecast to fully rebound from the impact of C19 by 2024 (with recovery set to reach just 5% below 2019 level this year, 2023). A key driver to achieving this was the reopening of China's borders from January 2023.

Extract from PWC UK Hotels Forecast

	Harsh		Mild	
	Level	Growth (YoY)	Level	Growth (YoY)
2021		46.1		
2022	72.0	56.2	71.9	55.9
2023	75.8	5.3	77.7	8.1

	Harsh		Mild	
	Level	Growth (YoY)	Level	Growth (YoY)
2021		92.4		
2022	147.4	59.6	147.6	59.8
2023	160.4	8.8	164.6	11.5

Mayoral Targets

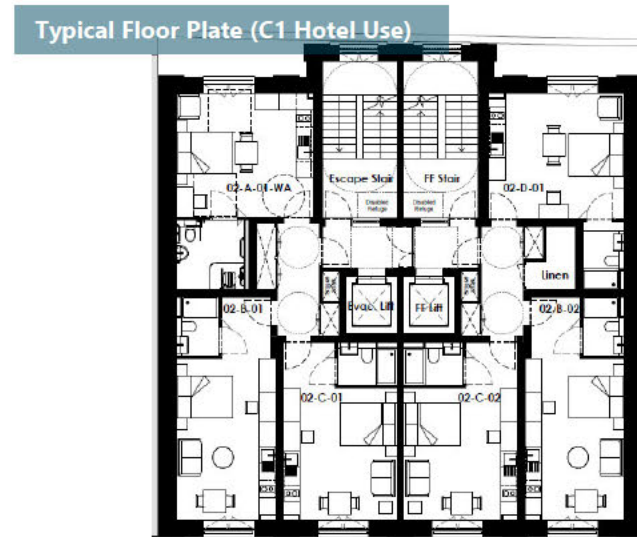
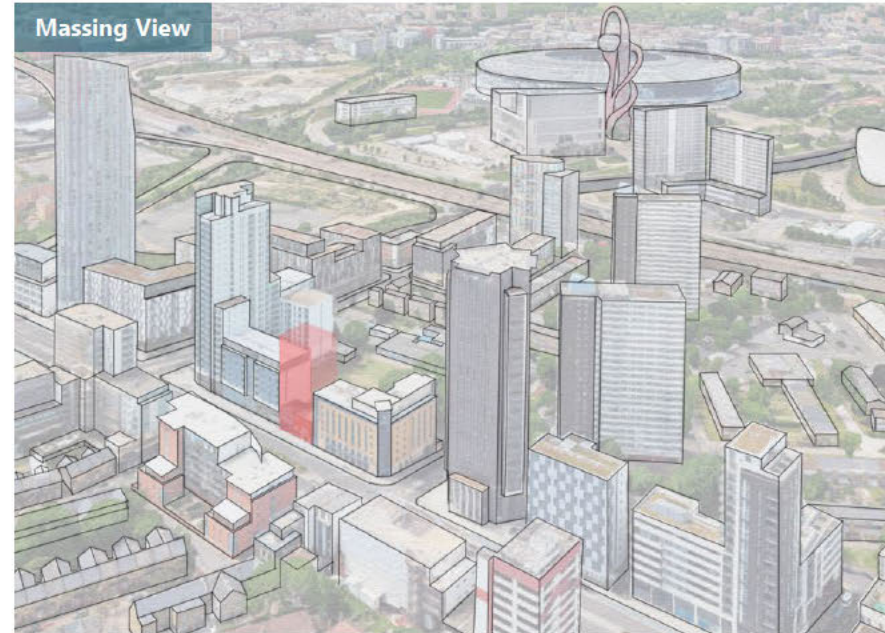
- The Mayor of London has identified tourism as a key sector for London's economy and has clearly stated that the sector must be encouraged and infrastructure developed to meet anticipated growth in demand – including most especially hotels that will appeal to visitors and enhance the overall experience, whilst also improving previously neglected parts of the capital. The project under consideration clearly fulfils all these criteria and is entirely Mayoral Targets appropriate.
- In addition, in July 2019, the Prime Minister announced the UK's first ever tourism sector deal, reaffirming the UK's global role as a key player in the industry. In essence, the initiative is to ensure that the UK can attract an extra 9m visitors per annum, with a commitment to build 130,000 new hotel rooms by 2025. As London is the most popular destination in the UK, the Prime Minister's pledge will be highly dependent upon all stakeholders in the capital working together to facilitate such growth in supply in order to enable such growth in demand and to ensure such targets become reality.

7. Future Demand Analysis

7.2 Relevance to the Project Under Consideration

Concluding Remarks

- Despite political and economic uncertainty, London is expected to see steady growth in office-based employment over the next decade, with an anticipated 362,000 more jobs to be created, requiring an additional 24m sqft of office space (roughly the equivalent of Canary Wharf and Docklands' office stock).
- Commercial activity within LBN is concentrated in two geographical areas, namely Stratford and Royal Docks. LBN is becoming a very dynamic borough and has one of the fastest growing populations in the UK. Regeneration projects, new infrastructure and multiple new attractions are transforming the Stratford area in particular.
- London is one of the most visited cities in the world and is home to a wealth of world-class attractions and events. Although not as centrally located as other higher profile boroughs, LBN is increasingly being recognised as offering activities and attractions for a wide diversity of tourists (both domestic and international).
- The combination of strong commercial activity and an emerging profile as an area where tourists would like to stay and visit is underpinning the growth in hotel supply in LBN, and most recently within Stratford.
- Demand for hotels in the area is expected to grow strongly in future, especially if offices become more like 'work hubs' and workers move to live outside London, whereby such workers will require well-priced, short stay overnight accommodation in the capital on an increasingly more frequent basis.
- The site has many strengths owing to its location and easy accessibility, and the proposed concept as an attractive aparthotel means that it should fill a gap in the local marketplace and drive reasonable levels of performance once operational.
- As identified in this report, there are very few genuine aparthotels in LBN (and none close to the project site) and even less which can provide a value-for-money service to complement the transformation of Stratford as a key transport hub and price-sensitive tourist destination.
- The Applicant is in advanced discussions with well-known brands who are keen to manage the property on completion.
- Despite all the increases in supply across 'All London' and in LBN, post-C19, occupancy and ADR levels have continued to perform strongly (and are projected to continue to do so in the medium to long-term), reflecting the strength of London's hotel sector and that of the Stratford area in particular, indicating that the strength of demand in the local area should be sufficient to absorb the project under consideration, where there are few such units in the immediate vicinity.



Source: Maccreanor Lavington Architects

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	8.3 International Visitor Trends to London	
	8.4 Hotels included within the STR Performance Trends Report for the Stratford area of LBN	

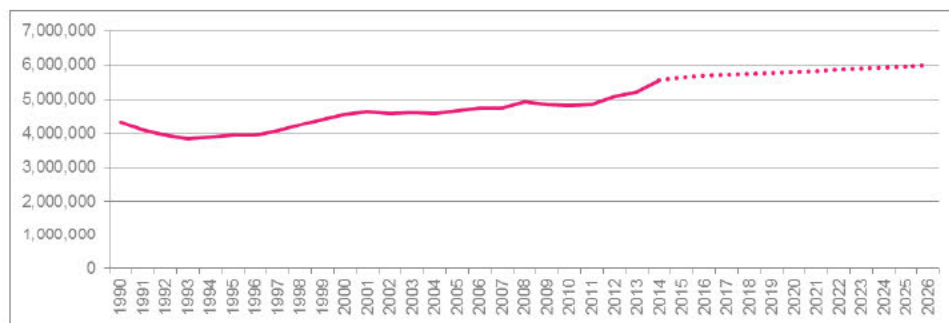
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8.1 Employment in London

Overview

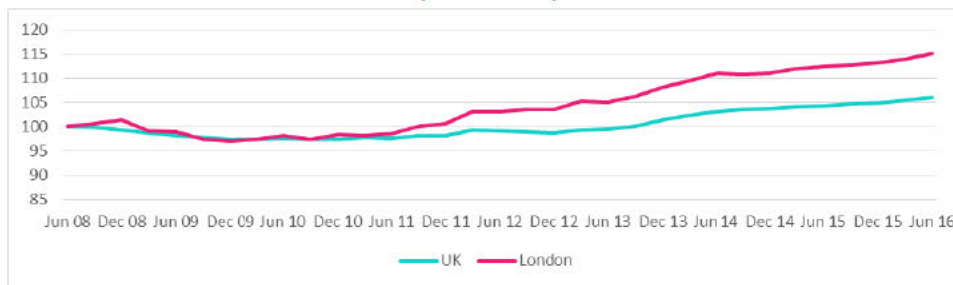
- According to London First, in 2016, London was home to 5.7m of the UK's 34m jobs and has seen continued growth since 2011, recovering quickly from the last downturn (see chart top right).
- Given the types of jobs available in London, (see chart middle right) many of those employed have some form of higher education or equivalent, including postgraduate level.
- A wide variety of sectors make up London's jobs (see chart bottom right), with most jobs being in the Business & Professional Services sector (reflecting London's status as the leading international financial centre), Creative sectors (reflecting London's leading position in high tech), Retail Trade, Education, Financial Services and F&B Services (reflecting London's status as one of the most visited cities in the world by international arrivals).
- Estimates prepared by London First indicate that the number of London jobs could rise to approximately 6m by 2026 (see chart below), meaning just over 300,000 new jobs could be created over a 10-year period (similar growth rate to that experienced during the early to mid-2000s). Most of these new job openings are expected to be in Professional occupations, and in the following sectors:
 - F&B services
 - Retail trade
 - Education
 - Head office, etc
 - Health

London Workforce Projection to 2026

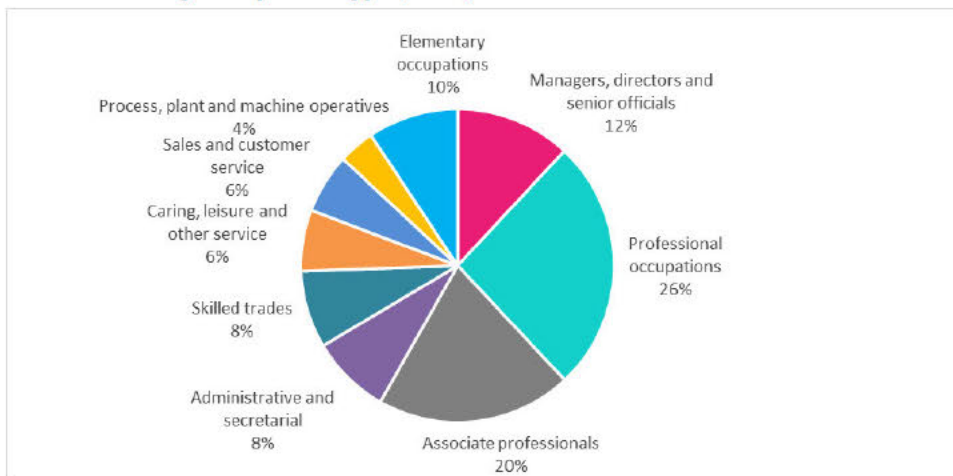


Source: London First

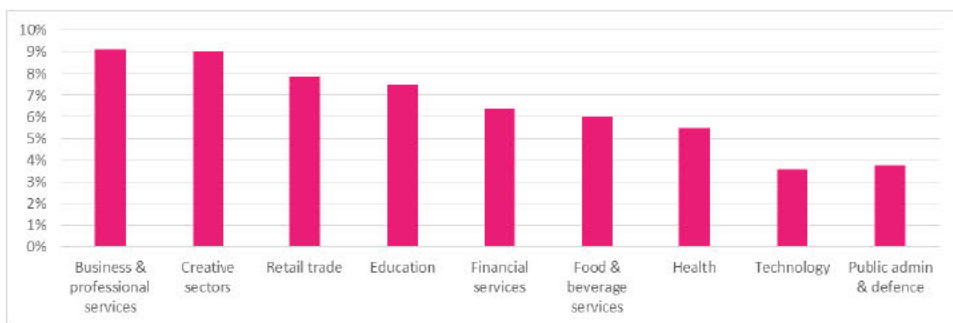
Jobs Growth in London and the UK (2008 = 100)



London Jobs By Occupation Type (2016)



London Jobs By Industry Area (2016, largest industry areas only)



Source: London First

8. Appendices

8.2 Outlook for London Office Development

Deloitte's London Office Crane Survey

- With reference to the regularly published *London Office Crane Survey* produced by Deloitte, we have extracted key graphics from the Summer 2023 report and present them below to highlight the anticipated long-term strength of the London office sector in terms of new build office developments. We also include a graphic from Colliers' recent research on London Offices Take-up by Business Sector (top right).

The volume of new starts is up by almost 80% over the Winter 2022 survey

Central London: Volume and number of new starts per survey



Source: Deloitte

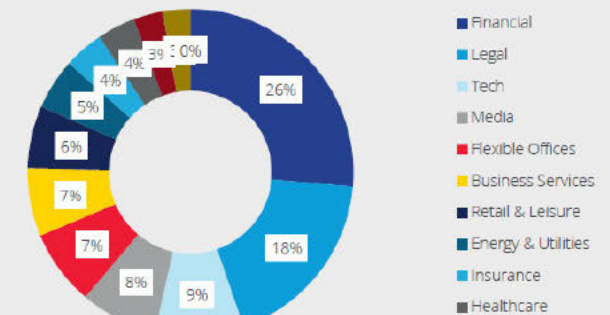
With the new start volume exceeding the completion volume over the survey period, the volume under construction has risen by 12% over the previous survey

Central London: Total volume under construction per survey



Source: Deloitte

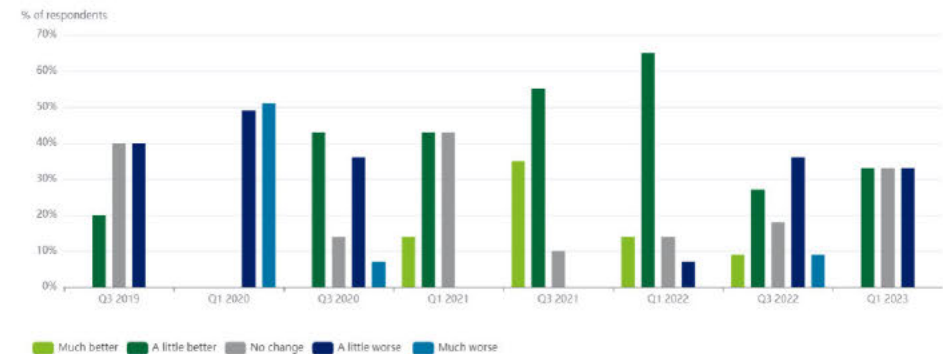
London Offices Take-up by Business Sector



Source: Colliers

Developers perceive a somewhat stable leasing market

Developer Survey: 'Compared to six months ago, how do you currently perceive the leasing market?'



8. Appendices

8.3 International Visitor Trends to London

Overview

- The table below is an analysis of the latest data produced by the Office of National Statistics (ONS) and obtained from London Datastore (www.data.london.gov.uk). It shows that since 2002 the number of international visits to London from international source markets grew by a Compound Annual Growth Rate (CAGR) of 3.8%, recording a total of 21m visits in 2019.
- Number of nights spent in London also grew, by a CAGR of 2.7%, less than the number of visits, which would suggest visitors are staying for shorter periods of time.
- Spend increased by a CAGR of 6.1%, indicating that London's appeal is in good health.
- In 2019, the most important international source markets were:
 - USA (14.2% of total visits in 2019)
 - France (8.5%)
 - Germany (6.9%)
 - Italy (6.4%).
- Note: only the leading source markets are shown in the table below, the remainder have been hidden from view for presentation purposes.

Analysis of International Visitors to London

Country of origin	Visits (000s)																			Visits (000s)		Nights (000s)		Spend (£m)	
	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Ratio	CAGR	Ratio	CAGR	Ratio	CAGR	
Australia	436.9	450.7	477.7	552.6	578.8	595.3	583.7	571.2	624.3	681.3	596.9	687.3	614.9	629.0	600.4	653.6	588.3	567.6	2.6%	1.6%	3.3%	1.5%	3.3%	5.6%	
Belgium	288.6	306.2	359.2	300.5	342.8	351.1	307.7	349.9	488.8	406.4	470.3	530.7	490.2	529.8	453.7	514.0	511.7	519.2	2.4%	3.5%	1.2%	2.8%	1.2%	6.1%	
Brazil	64.7	46.1	58.6	65.4	91.5	108.9	150.9	108.4	149.2	211.3	215.2	220.0	256.0	259.6	148.8	195.8	191.9	214.0	1.0%	7.3%	1.4%	4.3%	1.1%	7.5%	
Canada	358.3	317.2	368.9	399.2	439.5	478.1	499.7	371.2	389.5	428.8	402.9	434.5	359.2	407.5	445.3	457.5	474.4	499.2	2.3%	2.0%	2.6%	2.3%	2.6%	6.2%	
China	39.5	42.6	61.0	58.1	64.8	79.2	60.1	46.7	55.4	80.6	104.1	96.4	98.9	167.1	164.9	219.4	278.5	574.3	2.6%	17.1%	4.3%	18.4%	5.5%	21.3%	
Denmark	191.4	209.8	238.1	286.7	291.3	312.3	298.4	332.2	273.8	340.2	325.7	378.5	339.4	422.7	412.8	407.2	451.7	355.0	1.6%	3.7%	1.1%	2.3%	1.3%	6.2%	
France	1,102.9	1,190.9	1,258.1	1,367.3	1,447.5	1,342.4	1,409.9	1,528.2	1,624.3	1,600.5	1,681.3	1,904.0	2,010.0	2,071.4	1,993.4	2,014.7	1,834.6	1,837.1	8.5%	3.0%	5.8%	2.6%	4.8%	5.7%	
Germany	889.4	891.7	1,172.9	1,280.9	1,274.7	1,196.6	1,052.4	1,068.9	1,257.4	1,214.5	1,199.1	1,295.3	1,341.1	1,401.2	1,472.8	1,462.3	1,452.4	1,507.1	6.9%	3.2%	4.8%	2.2%	4.5%	5.7%	
India	135.2	130.4	160.3	166.0	229.6	219.7	241.6	177.9	235.9	235.3	231.5	243.6	252.3	275.7	273.4	382.4	367.1	444.6	2.0%	7.3%	4.3%	5.2%	2.3%	9.1%	
Irish Republic	628.9	623.6	682.8	726.5	718.4	732.3	736.1	690.4	656.6	620.3	595.9	610.6	620.3	793.2	806.4	826.5	649.5	748.5	3.4%	1.0%	2.0%	-0.1%	1.7%	1.6%	
Italy	541.6	601.4	765.4	643.7	851.2	837.7	981.0	747.6	932.2	1,009.3	962.8	1,072.2	1,185.7	1,165.1	1,251.5	1,052.0	989.9	1,391.7	6.4%	5.7%	6.1%	4.6%	4.7%	8.0%	
Japan	294.5	232.5	265.0	242.9	245.2	220.1	167.8	180.5	168.2	166.4	177.9	155.3	157.5	151.4	180.3	174.8	192.7	310.1	1.4%	0.3%	1.3%	-1.3%	1.8%	2.7%	
Netherlands	492.4	619.2	578.3	606.7	659.8	665.3	654.1	683.9	621.2	631.2	637.9	686.7	705.2	690.5	805.6	825.6	695.2	711.7	3.3%	2.2%	1.9%	-0.1%	2.0%	4.2%	
Norway	178.4	182.0	218.0	265.9	302.2	306.6	337.6	324.1	372.1	382.1	396.8	480.1	471.9	434.6	380.4	336.7	357.2	321.0	1.5%	3.5%	1.0%	2.3%	1.4%	6.0%	
Poland	115.3	167.2	277.8	425.2	528.2	432.7	451.3	359.6	355.7	353.7	396.2	419.2	446.5	531.4	534.1	506.8	510.3	517.5	2.4%	9.2%	1.8%	-1.3%	1.1%	8.1%	
Portugal	97.8	97.5	97.0	113.6	120.8	144.1	133.8	136.7	172.4	165.6	153.0	138.0	191.3	223.0	279.9	257.1	215.8	353.7	1.6%	7.9%	1.9%	8.3%	1.3%	8.9%	
Russia	143.2	160.1	193.4	133.2	159.6	165.1	125.0	85.7	119.1	154.4	155.3	147.2	164.8	99.0	92.6	153.3	121.9	118.7	0.5%	-1.1%	0.7%	-0.4%	0.7%	-0.4%	
Saudi Arabia	42.8	34.1	37.7	37.0	39.5	56.5	63.8	58.6	54.2	66.8	74.4	90.9	99.1	103.9	108.5	114.6	120.5	185.9	0.9%	9.0%	1.6%	9.7%	3.1%	13.2%	
Singapore	57.5	52.6	57.2	49.9	70.9	63.4	77.0	64.7	89.2	88.9	106.7	91.5	120.6	148.6	124.5	155.8	121.8	159.5	0.7%	6.2%	0.8%	6.5%	1.3%	11.3%	
South Africa	162.5	156.8	167.6	180.1	216.8	174.8	164.2	131.5	123.4	108.7	118.8	142.3	124.5	134.5	103.8	128.6	113.1	121.9	0.6%	-1.7%	0.7%	-4.9%	0.8%	0.8%	
South Korea	67.0	88.6	114.6	119.1	119.4	128.0	109.5	58.0	84.8	108.1	130.7	154.8	164.6	181.9	160.3	164.4	137.1	265.9	1.2%	8.4%	1.6%	7.4%	1.4%	11.1%	
Spain	444.4	526.6	691.6	709.7	933.5	967.5	895.3	1,011.3	875.2	894.8	795.9	865.7	984.3	1,153.2	1,281.7	1,224.2	1,254.5	1,212.3	5.6%	6.1%	5.2%	3.9%	3.1%	5.0%	
Sweden	291.9	307.9	327.2	333.8	383.1	401.9	417.5	335.1	442.6	457.7	503.1	516.1	547.4	553.6	506.0	509.1	456.6	458.4	2.1%	2.7%	1.5%	2.1%	1.5%	4.4%	
Switzerland	310.6	297.1	292.6	331.4	389.2	372.4	348.2	354.3	314.5	391.2	425.0	453.8	503.1	504.4	527.0	505.7	424.2	486.0	2.2%	2.7%	1.4%	2.2%	1.8%	4.7%	
Turkey	41.2	61.0	55.9	51.9	91.6	77.9	75.4	58.9	71.7	69.4	91.5	90.8	103.0	116.8	114.5	106.7	110.0	187.6	0.9%	9.3%	0.8%	5.8%	0.9%	9.5%	
United Arab Emirates	60.6	58.3	73.2	61.8	89.1	91.5	123.7	121.4	107.2	118.2	133.3	161.3	152.1	181.3	185.4	201.7	208.8	313.8	1.4%	10.2%	1.9%	7.5%	3.5%	13.1%	
USA	2,446.3	2,233.1	2,406.4	2,276.8	2,536.9	2,333.6	1,907.9	1,839.1	1,765.6	1,842.8	1,862.3	1,877.9	1,982.2	2,142.3	2,321.7	2,617.3	2,631.2	3,087.8	14.2%	1.4%	12.1%	0.1%	15.6%	3.1%	
Grand Total	11,603.4	11,695.8	13,389.3	13,892.6	15,592.6	15,339.8	14,753.0	14,211.3	14,705.5	15,289.5	15,460.9	16,810.8	17,404.2	18,581.1	19,059.5	19,827.8	19,090.2	21,713.5	100.0%	3.8%	100.0%	2.7%	100.0%	6.1%	

Source: ONS

8. Appendices

8.4 Hotels included within the STR Performance Trends Report for the Stratford area of LBN



Name of Establishment	City	Postal Code	Country	Class	Open Date	Rooms
MOXY London Stratford	London	E15 1GR	United Kingdom	Upper Midscale Class	Oct 2017	294
Travelodge London Stratford	London	E15 2JG	United Kingdom	Economy Class	Feb 2012	188
Holiday Inn Express London Stratford	London	E15 2LS	United Kingdom	Upper Midscale Class	Oct 2002	153
The Westbridge London	London	E15 2TF	United Kingdom	Upper Midscale Class	Aug 2012	80
ibis London Stratford	London	E15 4LJ	United Kingdom	Midscale Class	Jun 2000	108
Marlin Apartments Stratford	London	E151PE	United Kingdom	Upper Upscale Class	Jan 2008	111
Roomzzz London Stratford	London	E154PT	United Kingdom	Upper Midscale Class	Jul 2018	98
Holiday Inn Express London Royal Docks Dockland	London	E16 1EA	United Kingdom	Upper Midscale Class	Aug 2000	136
Aparthotel Adagio London Stratford	London	E20 1DB	United Kingdom	Upper Midscale Class	Apr 2021	136
The Gantry London, Curio Collection by Hilton	London	E20 1DB	United Kingdom	Upper Upscale Class	Nov 2021	291
Premier Inn London Stratford	London	E20 1EH	United Kingdom	Economy Class	Sep 2011	267
The Stratford Hotel	London	E20 1FD	United Kingdom	Upscale Class	Jun 2019	145
Hyatt House London Stratford	London	E20 1GL	United Kingdom	Upscale Class	Apr 2012	125
Hyatt Regency London Stratford	London	E20 1GL	United Kingdom	Upper Upscale Class	Apr 2012	225
Total Properties:					14	2357

Note

- In order to comply with the sample parameters required by STR, we have had to include a single hotel outside of the Stratford area in order to obtain an STR database compliant report. This additional hotel is the Holiday Inn Express London Royal Docks Dockland and was chosen because of its proximity to Stratford and because of its small size (thus diluting to the minimum any possible impact it could have on the overall market data for Stratford and trends therein).



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