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## Appeal Decision

Inquiry held on 27 September 2016

Site visit made on 30 September 2016

**by Katie Peerless Dip Arch RIBA**

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

**Decision date: 24 November 2016**

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### **Appeal Ref: APP/X5990/C/11/2166636 100 - 102 Westbourne Terrace, London W2 6QE**

- The appeal is made under section 174 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991.
  - The appeal is made by Mr Oriel Badia, Equity Point Holdings against an enforcement notice issued by City of Westminster Council.
  - The enforcement notice, numbered 10/44805/C, was issued on 26 October 2011.
  - The breach of planning control as alleged in the notice is the material change of use of the property from a hotel (class C1) to a mixed use hotel and hostel (Sui Generis).
  - The requirements of the notice are to cease the mixed hotel and hostel use (Sui Generis) of the property by undertaking the following steps:
    - (i) The booking of individual beds in rooms shall cease;
    - (ii) Reduce the number of bed spaces to a maximum of 150 and that no room contain more than 4 beds;
    - (iii) Remove all equipment and fixtures associated with the hostel use including all bunk beds apart from a single locker per room;
    - (iv) Cease the provision of a communal laundry area for guests, by removing the coin operated washing machines and dryers from the premises.
  - The period for compliance with the requirements is six months.
  - The appeal is proceeding on the grounds set out in section 174(2)(a), (b), (c) and (f) of the Town and Country Planning Act 1990 as amended.
  - This decision supersedes that issued on 15 January 2013. That decision on the appeal was remitted for re-hearing and determination by order of the High Court.
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### **Decision**

1. The appeal is allowed on ground (f) and the enforcement notice is varied: by the deletion of the text of the requirements in paragraph 5 and the substitution of the following requirements:

*Cease the mixed hotel and hostel use (Sui Generis) of the property. This can be achieved by undertaking all the following steps:*

- (i) Cease the booking of individual beds in rooms;*
- (ii) Reduce the number of bed spaces to a maximum of 204 with no more than 4 beds per room;*
- (iii) Remove all equipment and fixtures associated with the hostel use including all bunk beds, apart from 1 pair of bunks and a single locker per room;*
- (iv) Cease the provision of a communal laundry area for guests, by removing the coin operated washing machines and dryers from the premises.*

Subject to these variations the enforcement notice is upheld.

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## Site and surroundings

2. The appeal site, known as Equity Point London, is described in the Statement of Common Ground <sup>1</sup> and comprises 2 former terraced houses that now interconnect and which have been extended at the rear and altered internally to provide tourist accommodation. The original building extends to 6 floors plus a lower ground level and the extension has 4 floors below a flat roof. The property was granted planning permission for use as a class C1 hotel in 1964, the same year that permission was granted for the extension. The accommodation includes a reception area, 68 bedrooms with attached bathrooms, a breakfast room, group assembly room, library/computer room, small café, kitchen and laundry room.
3. Through traffic in Westbourne Terrace is separated from the private service road immediately in front of the buildings, where there are parking spaces attached to individual properties. Those in front of 100 – 102 are not in use and vehicles are prevented from accessing them by strategically placed planters. At present the main entrance to the property is through the northernmost door, with the other being used as a secondary fire escape route.

## Main Issues

4. I consider the main issues in this case are:
  - on ground (b): whether the alleged change of use has occurred as a matter of fact and, if so;
  - on ground (c): whether change of use is material, so that planning permission is required to authorise it and, if so;
  - on ground (a): the effect of the development on the amenities of neighbouring occupiers, with particular regard to noise and disturbance.If all these grounds fail then, on ground (f): whether the requirements of the notice exceed what is required to remedy the breach or the injury to amenity.
5. The terrace, of which the buildings are part, is grade II listed but there has been no issue raised in the enforcement notice relating to any impacts on the listed building. I also find that there have been no impacts on the architectural or historic character of the building resulting from the alleged change of use.

## Procedural matter

6. The first Decision on this appeal was issued on 13 January 2013 but was challenged by the Council, firstly in the High Court and then the Court of Appeal (CoA) where the challenge succeeded. The matter was therefore remitted back to the Secretary of State for re-hearing and determination in accordance with the opinion of the Court. The first Decision succeeded on grounds (b) and (c) and the appeals on grounds (a) and (f) were not, therefore, considered at that time.
7. The Council submits that, because the CoA found that *'it is difficult to see how, in the light of her findings of fact, she could reasonably have reached any conclusion other than that there was a mixed hotel and hostel use'*, I should take this as a direction that the appeal on ground (b) should automatically fail. I accept that there is no need to re-examine the factual basis on which the first Inspector reached her decision, provided that these have not been shown to be incorrect.

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<sup>1</sup> Inquiry Document 8

8. However, I am also mindful that the CoA did not have the benefit of a site visit or of hearing the arguments now put before me on the interpretation of the facts. The judgement also states that '*the question whether a mixed use exists is one of planning judgement, based on the facts as a whole*' and that '*the existence of some ... factors pointing in the direction of a hostel use is not necessarily determinative.*'<sup>2</sup>
9. This finding makes reference to the, now cancelled, Circular 03/2005, which was withdrawn on 7 March 2014, prior to the CoA judgement. However, the CoA acknowledged this and was not therefore relying on the Circular when it gave its judgement, although it notes that the guidance in it was not challenged during the proceedings.<sup>3</sup> Consequently, it seems to me that I must consider the same, unchallenged facts as the previous Inspector, as well as the guidance in the Circular, but I am not necessarily bound to reach a particular conclusion on the facts when coming to a decision on the appeal on ground (b).

## Reasons

### *Ground (b)*

10. Turning to the appeal on ground (b), the appellants consider that the alleged change of use, from a Class C1 hotel to a mixed use of hotel and hostel, has not occurred as a matter of fact. The Court concluded that the previous Inspector had erred in her judgement because she considered that she needed to establish whether there were some areas used exclusively as a hotel and some as a hostel and, because there were not, there had been no consequent change of use. That was found to be an incorrect test and there need not be a physical distinction between the parts of the building in each particular use for a mixed use to occur. Therefore, the correct test is only whether an element of hostel use was occurring at the time the enforcement notice was issued. To establish this, it is therefore necessary to consider the characteristics of both hotel and hostel uses and the differences between them.
11. Hostels were previously included in the same use class as hotels until 1994 when they were changed to a '*sui generis*' use following concerns that hotel accommodation was not being used for tourism purposes but was being used to house other groups such as benefit claimants, which could have an impact on the amenities of the surrounding area. There is, however, a range of uses to which a hostel can be put, such as housing for students or nurses, transient accommodation for those being re-housed elsewhere, shelter for those in need of a safe place to stay on a temporary basis or a tourist facility for those travelling on a budget and ready to accept a standard of accommodation lower than that generally found in a hotel. There is no dispute that the use enforced against in this case falls within the last category.
12. There is no definition of a hostel in planning terms but the case of *Panayi v Secretary of State for the Environment and Hackney Borough Council [1985] 50 P&CR 109*, also referred to in the Circular guidance and the CoA judgement, sets out some indicators that can point to a hostel use. It must, however, be remembered that this was not a definitive list and it was intended to distinguish between use as a hostel and as self-contained flats. It did not seek to compare a hotel and a hostel use.

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<sup>2</sup> Paragraph 30 of CoA judgement

<sup>3</sup> Paragraph 5 of CoA judgement

13. However, *Panayi* also endorsed the finding in *Commercial and Residential Property Development Co Ltd v Secretary of State for the Environment [1982]* that 'a hostel used as transient accommodation has many of the characteristics of a hotel' and 'it means a building in which people either live or stay which provides communal facilities'. It also noted that 'the sleeping accommodation is relatively basic and inexpensive'.
14. The CoA agreed that 'the distinction between hotel use and hostel use is a fine one'<sup>4</sup> and the appellants consider that the Equity Point London operation should be classified as a budget hotel. Nevertheless, the majority of the sleeping accommodation at the appeal site is in bunk beds in communal bedrooms, with 23 of the rooms having 4 beds in the form of 2 bunk units, 22 having 6 beds in 3 bunk units and 10 rooms having 8 beds in 4 bunk units. The remaining 13 rooms have 2 or 3 beds. Consequently 212 of the 338 beds are in rooms shared by 6 or 8 people and only 34 beds are in rooms shared by 2 or people. Each room has a bathroom shared by the occupants.
15. I accept that rooms with 4 or 5 beds can be found in hotels but I consider that it would be unusual, even for a budget hotel, to have the majority of its accommodation in multiple bed rooms, particularly where, as in this case, the beds in these rooms can be booked individually. In that instance, visitors would be sharing a bedroom with strangers, which is not a normal feature of hotel accommodation. The examples of accommodation at budget hotels such as easyHotel and Premier Inn, submitted by the appellants, do not feature rooms with more than 3 beds or 'by the bed' booking.
16. Similarly, whilst bunk beds can be a feature of family rooms in hotels, a room with only bunks, sleeping up to 8 people is, to my mind, akin to a dormitory, as found in hostel accommodation. The appellants consider that dormitories are only found in institutions but I consider that they are not exclusive to such premises. For example, a youth hostel, which is a form of tourist accommodation rather than an institution, commonly has rooms that are considered to be dormitories. In fact, the larger rooms at Equity Point London are described as dormitories on the company website and this term is used by other operators of similar premises advertising themselves as hostels. Whilst this may not be definitive, it gives an indication of how the facility is being marketed and the type of traveller it is aiming to attract.
17. The appellants have submitted a number of examples of premises that have a C1 hotel use, either through the grant of planning permission or a certificate of lawful use, and are similar to the operation at Equity Point London; however none of these are in Westminster.
18. In relation to the first of these examples, I accept that when the business at 78 Kings Cross Road was granted planning permission, the Council was aware that the premises would house up to 343 guests in 99 rooms. It now, apparently, offers 114 bedrooms and a total of 620 beds. The permission is subject to a condition that the development was to be completed in full accordance with the approved plans and details. There is no information on whether any enforcement action has been considered or taken relating to the current use. There is also no indication in the Officer's Report that there was any assessment of whether the proposed use fell wholly within use class C1.

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<sup>4</sup> Paragraph 5 of CoA judgement

19. Another facility for the same operator as that noted above was granted planning permission in 1997. This was for a hotel at 261-265 Grays Inn Road which has dormitories for up to 18 people but, again, there is no indication as to whether differences between a hotel and hostel use were considered before permission was granted.
20. The third example was a planning permission granted in 2010 for a 75 bedroom/269 bed C1 hotel at 144 – 152 Walworth Road. Similar comments to the preceding properties apply and the website for the facility describes the site as a hostel.
21. The fourth case, 51 Grove Road E3 4PE, was granted a certificate of lawful use as a C1 hotel/guest house because the Council was satisfied that the use to which it was being put had been in existence for over 10 years. Again I have not been provided with any details on whether the use might actually have been as a hostel, rather than a hotel, although the business now describes itself as a 'boutique hostel'.
22. Finally the property at 17 Longridge Road, Kensington was granted planning permission for use as a hotel in 1964 but its website notes that it has been a hostel since 1997. There is no information on whether the relevant Council considers the use now still falls within class C1.
23. The court cases referred to in preceding paragraphs, including those relating to this appeal, make clear that there is a distinction between a hotel and a tourist hostel, even though the 2 uses may share many of the same characteristics. I also agree that consistency of approach is important. However, I do not accept that the examples considered above provide any definitive conclusion on whether there has been a change of use as alleged at Equity Point London, particularly as the distinction between a hotel and a hostel did not appear to be a consideration when planning permission was granted for them.
24. The appellants have also submitted a list of hotels<sup>5</sup> which they say have at least 1 bedroom with more than 5 beds and which are operating under C1 permissions. However, of the 16 examples, 7 have a maximum of 5 adults/room, not 6. Where details of the number of beds in particular rooms are available, there is 1 hotel with a single 6 bed room, 1 with a single 5 bed and a single 6 bed room, 1 with 3 rooms with 5 beds, 1 with 2 rooms with 5 beds and 1 with 2 rooms with 6 beds. Details for the other examples state only the maximum occupancy of a room and there is no information on the comparative number of larger rooms or whether there is 'by the bed' booking available. It therefore seems to me that these examples are not directly comparable to the situation at Equity Point London and do not give any clear indication as to whether the premises are offering multi-bed rooms at a level that could be considered to amount to an element of hostel use.
25. Given that there is a difference between the 2 uses but no set definition for planning purposes, I consider it to be a matter of common sense and analysis as to when a change of use has occurred. The way Equity Point London operates in respect of the use of dormitories, the ability to book by the bed, the provision of a personal locker for each bed in the room, the requirement for guests in the larger rooms to provide or hire their own towels and strip their beds at the end of their stay is, to my mind, typical of a hostel.

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<sup>5</sup> Inquiry Document 5

26. Reviews on the company website make clear that the guests consider the facility to be a hostel and this is the view of the neighbouring occupiers who have made representations about the operation. The website also described the building as a hostel before the management changed the name to hotel after receiving complaints about the use.
27. At the time the enforcement notice was issued there was a guest launderette and it appeared that there could have been kitchen facilities available for guests, but these are now no longer offered as services. These are facilities more commonly found in hostels rather than hotels. Services in the form of room cleaning and breakfast were, and still are, provided and there are common recreational and congregation spaces, a café and tourist information point. All these could be found in either use and are not therefore definitive.
28. The provision of supervision is noted in *Panayi* as being a possible indication of a hostel use and at Equity Point London this is provided by a security guard at the door who is charged with overseeing the arrival of coaches and ensuring guests do not congregate outside the entrance, obstruct public areas or cause noise and disturbance outside the premises. Night receptionists also patrol the building and ask any noisy guests to be quiet and there are notices around the building informing clients of the need to respect the neighbours' amenities, prohibiting guests from bringing alcohol onto the premises and restricting the times at which certain parts of the building can be used.
29. These measures were instigated by the management of Equity Point London as a response to complaints received by neighbours. It is not clear whether these were in place on 26 October 2011, the date the enforcement notice was issued, but the evidence is that they were first introduced in that month. In any event, the need for such measures and the number of notices on display within the building directing visitors how to behave is, in my judgement, more indicative of a hostel use than a hotel.
30. There is still an element of hotel use, whereby guests can book a private room rather than a single bed and I accept that the operators can limit the number of 'by the bed' bookings to a maximum set percentage. Nevertheless, the extent of the dormitory accommodation, combined with the other factors noted above, indicates to me that there is an element of hostel use. The extent of this use, as evidenced by the number of dormitories, is not ancillary to the authorised C1 hotel use.
31. I note that the Glossary of Westminster's City Plan 2016 (WCP) includes tourist hostels and youth hostels within the C1 use class and draws a distinction between these and other residential hostels. Although the WCP has been examined before adoption, I consider that this is an anomaly, as the Glossary cannot change the definition that is set in the Statutory Instrument that is the Town and Country Planning (Use Classes Order) 1987 (as amended). It was confirmed by the Council's witness that this has been recognised and will be corrected when the Plan is next amended and I therefore give little weight to this factor.
32. Consequently, for the reasons set out above, I conclude that there has been a change of use at Equity Point London to a mixed use as a C1 hotel and sui generis hostel as a matter of fact and the appeal on ground (b) fails.

*Ground (c)*

33. To succeed on this ground, it must be shown that the change of use is not material and planning permission would not, therefore, be required to authorise it. To this end, I must compare any differences in the character of the use at Equity Point London at the time the enforcement notice was issued with the authorised use of the building as a C1 hotel.
34. The Council's witness suggested that, because the last hotel use before Equity Point Holdings took over the building was a more traditional one, it is against this model that the mixed use should be compared. The appellants however submit that it should be judged against any permissible C1 use, which could be at a much higher occupancy rate than previously.
35. Because there would be no means by which the number of beds in the hotel could be controlled through the existing planning permission, other than if it took the use out of the C1 class, I agree that it is appropriate to assume that the hotel could operate with many more occupants than could be accommodated in a 68 room premises mainly containing double or twin bed rooms.
36. Nevertheless, it seems to me that there is a distinct difference in the character of the use of even a typical budget hotel when compared to that of a hostel. With the majority of rooms being capable of housing 4 or more occupants, the facility will attract travellers who are likely to occupy the building in a different way to those who expect to stay in a private room.
37. The evidence from local residents points to a regular use of the hostel accommodation by groups of clients who are often young and travelling together in an organised party. The appellants do not deny that the business regularly caters for school or student groups, although they noted that the premises also serves groups of older travellers. However, the residents report noise and disturbance from the boisterous and excitable behaviour that is typical of, and to be expected from, the younger groups.
38. At the time the enforcement notice was issued, there had been many complaints about how the business was operating, focussing on the noise from the groups, not only when arriving by coach and waiting to be checked in but also when in the dormitories and moving around in the building.
39. I saw at the site visit that there is only one lift for the building and this was out of action on that day. Several reviews on the company website also mention that the lift was not working on other dates. In that situation guests would have to use the stairs which are narrow, quite steep and uncarpeted. Neighbours report being able to hear *'the noise from people either with or without their suitcases tramping up and down the stairs at all hours of the day and night'*.
40. Such noise and disturbance can only be exacerbated by large groups of clients arriving by the coach load. While it would be possible to ensure that coaches did not park outside the building at night, it would not be possible to prevent parties arriving at anti-social hours if, for example, their plane had been delayed.

41. Of course, there could be no restriction on this C1 hotel accepting bookings from groups of any age who may arrive in coaches. However, the range of clients who would be willing to share multi-bed rooms, even with their own travelling companions is likely, in my view, to be mainly younger groups.
42. As noted above, it has been found necessary to implement a number of measures that are aimed at limiting the impact of the operation on the amenities of the neighbouring occupiers. These include night patrols of the premises to try and prevent undue noise, a security guard who asks clients to move if they linger outside the building and policies for dealing with group bookings, service and deliveries and coach arrivals. Whilst some of these measures might sometimes be necessary in a hotel, the need for the combination of all of them leads me to conclude that the impacts of this particular hostel use are materially different from the lawful C1 use.
43. I consider that this stems mainly from the type of accommodation offered. The use of multiple beds in rooms has clearly encouraged the use of the property as a hostel for a particular class of visitors – schoolchildren and young people – travelling in organised groups. People travelling alone or in pairs or families normally create less noise and disturbance than such groups and are less likely to book the larger rooms. In this mixed hotel/hostel use, where most rooms have multiple beds and are occupied by groups who know each other and arrive together, the noise and disturbance has been shown to prove disturbing to local residents.
44. In my opinion, it is also the case that older travellers, even if travelling in a group, are unlikely to book bunk beds in rooms shared with others. While a hotel may cater for coach parties, these visitors would generally be housed in double or single rooms.
45. The availability of such a significant proportion of group accommodation, at rates lower than a typical budget hotel, allows a higher occupancy of the building than if the premises were being run as a class C1 hotel of equivalent size. It attracts a distinct type of clientele who expect a particular type of accommodation and use the facility in a different manner, which includes, amongst other things, a greater amount of comings and goings *en masse* than normally found in a hotel. This has, I consider, changed the character of the use to a significant degree.
46. It therefore seems to me that the change from the authorised C1 use to a mixed use as a hostel and hotel has, in this case, been material and planning permission would be needed to authorise it. The appeal on ground (c) therefore fails.

*Ground (a)*

47. The appellants consider that, if the previous grounds of appeal fail, planning permission should be granted for the change of use. This would grant retrospective planning permission for a mixed use as a hotel and hostel and extinguish the current use as a class C1 hotel.
48. The Council has now withdrawn some of the original reasons for issuing the enforcement notice, such as highway objections and concerns over the waste and servicing provisions to the building. However, it continues to maintain that the use is unacceptable in a residential area due to the levels of noise and disturbance.

49. For the reasons set out under the appeal on ground (c), I have found that one of the consequences of the change of use has been an impact on the amenities of the neighbouring occupiers and, from the detailed descriptions of the incidents that they have regularly experienced, as given in their representations and at the Inquiry, and from what I saw at the site visit, I consider this impact to be unacceptable. It has continued despite the measures already put in place by the appellants and which form the basis of the management plan that they consider would render the use acceptable. I am not therefore persuaded that securing such a plan through a condition attached to a planning permission would be enough to overcome the identified harm.
50. The change of use conflicts with policy S29 of the WCP: Consolidated Version (July 2016) which notes that proposals that result in an unacceptable material loss of residential amenity will be resisted. There are a number of policies that support the provision of economic development and tourist accommodation but, given the property would still have a lawful C1 use if planning permission for the mixed use was refused, there would be no loss of any hotel accommodation and these policies do not therefore support the change of use.
51. In the circumstances, and whilst accepting that the C1 use is not presently subject to any specific conditions, I conclude that planning permission should not be granted for the mixed use enforced against and the appeal on ground (a) fails.

*Ground (f)*

52. The appellants are concerned that the requirements of the enforcement notice go beyond what is required to remedy the injury to amenity or the breach of planning control and would restrict the ability of the owners or lessee of the property to operate the lawful hotel business within the limits of the C1 use class. The requirements call for the mixed use to cease and then list a series of measures that would bring this about.
53. The Council has submitted that the intention of the requirements is to prevent the mixed use as a hostel/hotel and that, once the enforcement notice was complied with and the hostel element had ceased, there would be nothing to prevent the owners or lessees taking steps such as increasing the number of beds in the hotel or increasing the number of beds in a room to more than 4. As such, the Council believes that the requirements of the notice would not prevent or restrict the lawful class C1 use.
54. It seems to me that the existing list of measures, when taken together, provides clear instructions as to how to ensure the requirement to cease the mixed use can be implemented. Following compliance, there would be no restriction on how a class C1 hotel could operate, provided it did not change back to the mixed use enforced against. However, I consider that this could be made clearer by a rewording of the requirements.
55. Therefore, I will insert the phrase '*This can be achieved*' before '*by*' in the first sentence and including '*all*' after '*undertaking*'. This makes clear that the primary intention is to cease the element of hostel use and that compliance would be achieved by undertaking all the items listed. It would not, however, mean that one of the elements of the list, if taken in isolation and re-instated, would necessarily revive that use. That would be a matter of fact and degree and dependant on the extent of the change.

56. In addition, I also consider that the somewhat arbitrary restriction to a total of 150 beds goes beyond what would be necessary to ensure that the hostel element ceased. It would not be unusual or unacceptable for all rooms in a hotel to have 3 beds and, at this level, the 68 rooms at Equity Point could therefore accommodate 204 beds. It would be sufficient, in my view, to increase the limit to this number whilst retaining the 4 bed per room limit to ensure that the larger dormitories are removed. This, when combined with the cessation of 'by the bed' booking, would allow flexibility in the way the rooms are laid out while bringing the use back to that of a conventional hotel. Once this has been achieved, there would be nothing to stop the hotel increasing the number of beds or providing a small number of rooms with multiple beds, as long as this did not, once again, result in a mixed hotel/hostel use.
57. Similarly, I consider that it is not necessary to insist on the removal of all the bunk beds. Bunk beds are not inconsistent with a hotel use, particularly where families are catered for; it is only the proliferation of them in this particular instance that has been partly responsible for the change of use. It seems to me that limiting the use of bunks to one set per room would ensure that the rooms remain as bedrooms, rather than dormitories. The presence of lockers in the rooms is more typical of a hostel use and should, I consider, remain limited to 1 per room as required by the notice.
58. In respect of the final requirement relating to the laundry, this has already been complied with and there is now no communal laundry available for guests in the property. It does not seem to me to be an unreasonable or overly restrictive constraint as such communal facilities are more typical of a hostel than a hotel.

### **Conclusions**

59. For the reasons given above I conclude that there has been a material change of use at Equity Point London and that planning permission should not be granted for that change of use. The appeals on grounds (a), (b) and (c) consequently fail. However, I have found that some of the requirements are excessive, and I am varying the enforcement notice accordingly as set out above, prior to upholding it. The appeal on ground (f) succeeds to that extent.

*Katie Peerless*

**Inspector**

## APPEARANCES

### FOR THE APPELLANT:

Alex Goodman	Of Counsel instructed under the public access scheme
He called	
Clara Puig	Area Manager, Equity Point Holdings
Christian Leigh MPhil MRTPI	Leigh and Glennie Ltd.

### FOR THE LOCAL PLANNING AUTHORITY:

Saira Kabir Sheikh QC	Instructed by Kirsten Chohan of Tri-borough Legal Services
She called	
Paul Simmons BA DipTP MRTPI	Westminster City Council

### INTERESTED PERSONS:

Mr J Chenci	Local resident
Mrs J Bowers	Local resident

### DOCUMENTS

- 1 Notes of Mr Goodman's opening statement
- 2 Bundle of legal authorities submitted by appellants
- 3 Court Order from the Court of Appeal
- 4 Notes of Ms Sheikh's opening statement
- 5 List of hotels with more than 5 beds per room submitted to the last Inquiry
- 6 Notes of Ms Sheik's closing submissions
- 7 Bundle of legal authorities submitted by Westminster City Council
- 8 Signed Statement of Common Ground
- 9 Notes of Mr Goodman's closing submissions