

Applicant: AA Developments Limited

Agent: Simon Zargar, Avison Young

Site Address: Cavatina Point, 4 Bridge Walk, Deptford, SE8 3DB	Ward: Greenwich West Application Type: Full Planning Permission
---	--

I. **Recommendation**

I.1 The Committee is requested to grant full planning permission as outlined below:

- Change of use from flexible use classes including: Business (Class B1), Non-residential Institutions (Class D1), Shops (Class A1), Financial and professional services (Class A2), Restaurants and Cafes (Class A3), Drinking establishments (A4), and Hot food takeaways (Class A5) to Hotel (Class C1) with ancillary facilities, associated external alterations, installation of plant and associated works.

Subject to:

- (i) The prior completion of an agreement under Section 106 of the Town and Country Planning Act 1990 (as amended) containing the planning obligations as summarised in the heads of terms set out in this report (see section 18), any addendums, and the minutes of this Planning Board meeting;
- (ii) Conditions set out in Appendix 2;
- (iii) To authorise the Assistant Director of Planning & Building Control to:
 - a. make any minor changes to the detailed wording of the recommended conditions as set out in this report (Appendix 2), its addendums and the minutes of this Planning Board meeting, where the Assistant Director of Planning & Building Control considers it appropriate, before issuing the decision notice; and

- b. finalise the detailed terms of the planning obligations pursuant to Section 106 of the Town and Country Planning Act 1990 (as amended), as set out in this report, its addendums and the minutes of this Planning Board meeting.
- (iv) In the event that the Section 106 Agreement is not completed within three (3) months of the date of this Planning Board meeting, to authorise the Assistant Director of Planning & Building Control to consider whether permission should be refused on the grounds that the proposals are unacceptable in the absence of the benefits which would have been secured, and if so, to determine the application with reasons for refusal which will include the following:
- In the absence of a legal agreement to secure a contribution towards Cycleway 4, which would encompass street-level upgrades and improvements to the public realm, as well as the introduction of two-way segregated cycle lanes to Creek Road, the proposal would fail to improve the pedestrian environment and encourage the uptake of active modes of transport, contrary to Policies T4 and T5 of the London Plan and Policies DHI, IM(b) and IM(c) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies.

1.2 It is important to note that this application was submitted prior to the change to the use classes which came into effect on the 1st September 2020, and as such, guidance states that the previous uses should be used to form the basis of the assessment. As this application was submitted in March 2020, the previous uses (before the changes in September 2020 came into effect) will be referenced throughout this report. It should however be noted that the proposed hotel use (C1 use class) remains unchanged as a result of the September 2020 amendments.

2. **Executive Summary**

2.1 Officers have considered the application against the relevant development plan policies contained within the London Plan (2021) and the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014). In addition, the National Planning Policy Framework (NPPF) (2019) and Planning Practice Guidance are of relevance.

- 2.2 The proposal is considered to be acceptable in principle and would make efficient use of a brownfield site in an urban location, which has remained vacant since the building completed in 2011, contributing to the borough's visitor infrastructure, thereby supporting the function of the Maritime Greenwich World Heritage Site and Greenwich as a tourist destination more generally.
- 2.3 The proposed amendments to the external façade are considered to be appropriate for the context, providing some level of interest whilst also providing an appropriate buffer between the hotel use and the street. The proposal is considered acceptable in terms of its impact on neighbours, with no significant increase in noise or disturbance likely at nearby residential properties as a result of the proposed use.
- 2.4 Detailed below is a summary of the application:

The Site -	
Site Area	1,000 m ²
Local Plan Allocation	No
Heritage Assets	None
Tree Preservation Order	None
Flood Risk Zone	Flood Zone 3 (benefits from flood defences)

Non-Residential Uses		
Existing Use(s)	Existing use (Classes) / Operator	Business (Class B1), Non-residential Institutions (Class D1), Shops (Class A1), Financial and professional services (Class A2), Restaurants and Cafes (Class A3), Drinking establishments (A4), and Hot food takeaways (Class A5).
	m ²	2,261 m ²
Proposed Use(s)	Proposed use(s) (Classes) / Operator	C1 (Hotel)
	m ²	2,261 m ²

Employment	Existing Number of Jobs	0 (Vacant)
	Predicted proposed number of jobs	25 FTE

Transportation		
Car Parking	No. existing car parking spaces	0
	No. Proposed Car Parking Spaces	0
	Proposed Parking Ratio	One long-stay cycle space for every 20 bedrooms, and one short-stay cycle space for every 50 bedrooms
Cycle Parking	No. Proposed Cycle Parking	10
	Complies with policy	Yes
Public Transport	PTAL Rating	4

Public Consultation	
Number in Support	0
Number of Objections	18
Number neither objecting nor supporting	1
Main Issues Raised (addressed in Section 8)	Noise Loss of business floorspace External design

- 2.5 The report details all relevant national, regional and local policy implications of the scheme, including supplementary planning guidance.
- 2.6 The application is considered acceptable and is recommended for approval, subject to the recommendations set out in section 1.

3. Site Location Plan

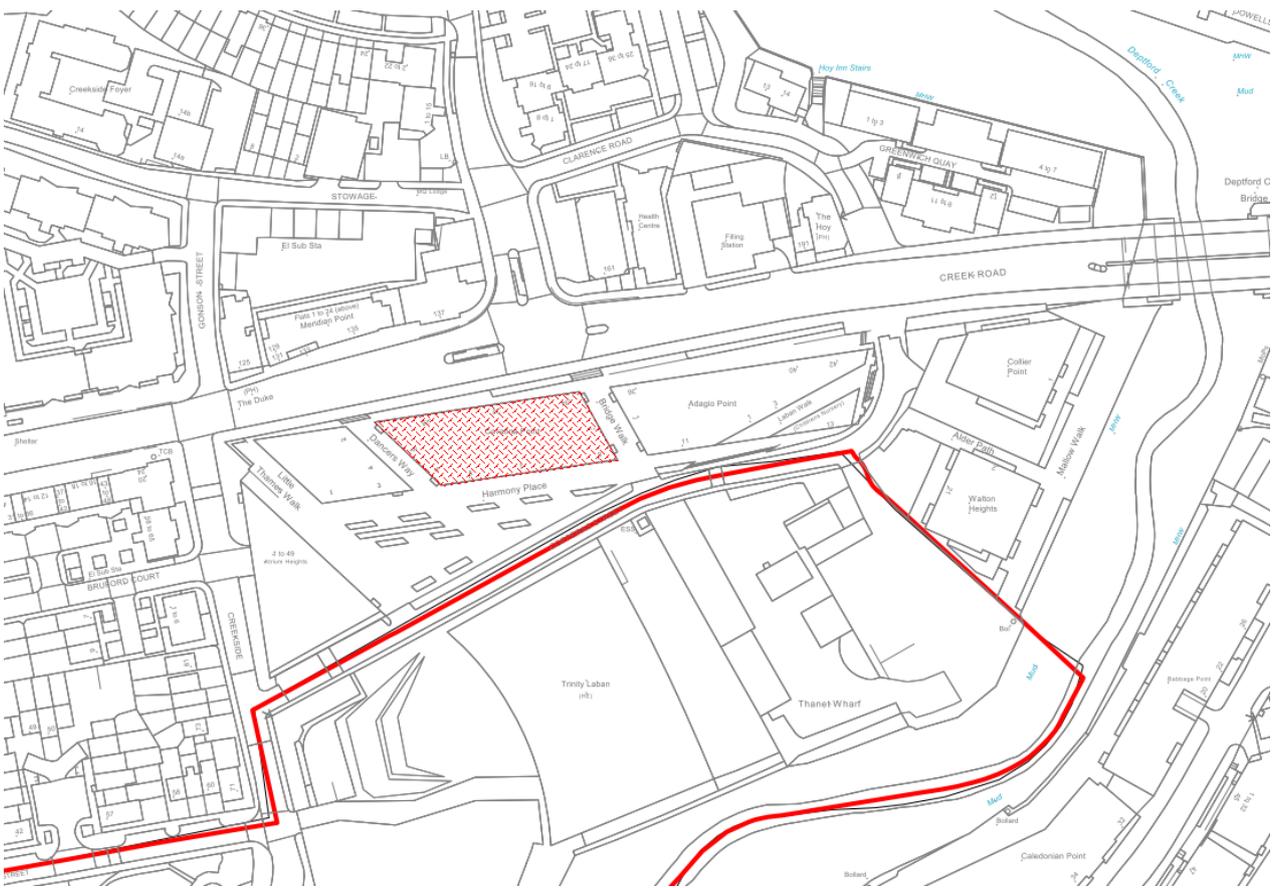


Figure 1 Red hatch identifies the applications site. Red line identifies the borough boundary.

4. Site and Surroundings

- 4.1 The application site comprises the ground, first and second floors of Cavatina Point (Block C), within the Creekside Village West development, fronting onto Creek Road to the north and a dedicated area of hard landscaping to the south.
- 4.2 The Creekside Village West development is formed of four separate buildings of varying height, sited between Creek Road (to the north), Copperas Street (to the south) and Creekside (to the west). The host building is 12 storeys tall and is located centrally within the wider development scheme.
- 4.3 The site lies approximately 225 metres east of Deptford Town Centre and approximately 375 metres west of Greenwich Town Centre.

5. Site Specific Local Plan Designations

- Flood Risk Area (Zone 3)

6. **Relevant Planning History**

- 6.1 In December 2007, application reference 06/2062/F, for the redevelopment of the land bounded by Creek Road, Creekside and Copperas Street, was granted planning permission for a mixed-use scheme providing 371 dwellings and 9,548 m² of commercial floorspace (A1-A5, B1, or D1 uses). Minor revisions to the scheme were approved under application reference 08/0035/F in March 2008, and the scheme was implemented shortly thereafter, completing in 2011.
- 6.2 Shortly after completion, an application was submitted under application reference 11/2563/F for the change of use of the ground, first and second floors of Cavatina Point from the flexible uses listed above to a hotel, and this application was granted in March 2012.
- 6.3 This change of use was never implemented and lapsed in March 2015, with no active commercial uses ever having been implemented within Cavatina Point.
- 6.4 A subsequent application was submitted under application reference 16/2938/F to renew the previously granted consent and change the use of the ground, first and second floors of Cavatina Point into a hotel. This application was never determined and was finally disposed of on the 29th April 2019.

7. **Proposed Development**

- 7.1 The proposal seeks permission to change the use of the ground, first and second floors of the existing vacant building from flexible mixed use (A1-A5, B1, D1 use) to a 123-bedroom hotel (C1 use class). This change of use requires related alterations to the external façade of the building, and following amendments submitted during the course of the application, the proposed internally applied vinyl stickers have been replaced with a comprehensive external treatment comprising of sections of biodiverse living wall interspersed with stencils of local attractions.
- 7.2 The first and second floor levels will be given over entirely to providing sleeping accommodation for prospective guests, accessed from two internal cores, whereas the ground floor will include space for a lobby which can be accessed from the north from Creek Road or from the south from Copperas Street, together with a ground floor staff area, refuse storage and bike storage.

7.3 The proposal will require the installation of rooftop plant, and acoustic protection for nearby residential properties is included to mitigate any harm caused, specifically in the form of an acoustic rooftop enclosure.

7.4 It is noted that some of the internal works have already been carried out however these works do not constitute development, and the application under assessment is for a proposed change of use with associated external alterations.

8. Consultation

8.1 One hundred and ten (110) local properties were notified by way of letter dated the 29th April 2020, a site notice was displayed outside the application site on the 13th May 2020 and a press notice was displayed in the Greenwich Weekender on the 20th May 2020.

8.2 In addition, consultation with statutory bodies and local amenity groups was carried out and their comments are summarised below.

Statutory Consultees

8.3 A summary of the responses received from statutory consultees, together with officer's comments are set out in the table below:

Details of Representation	Summary of Comments	Officer's comments
Environment Agency	No objection, subject to the inclusion of a condition which requires the floor level of the ground floor sleeping accommodation to be raised to 5.68m (AOD) prior to the use of this level as a hotel. Ground floor sleeping accommodation below this level would constitute a reason for refusal as the proposal would pose too great a risk to human life.	The initial scheme submitted, was considered unacceptable because it showed the floor level of sleeping accommodation below 5.68m. The suggested condition to raise the floor levels of the ground floor prior to its use as sleeping accommodation has been included in the officer's recommendation and appendix 2.
Transport for London (TfL)	TfL's preference is that on-street parking spaces are	The recommendation to convert an on-street

	<p>converted to a disabled person parking space however the concerns of the RBG highway officers are noted. Should no disabled person parking provision be provided on this site, the routes to step-free and accessible modes of public transport must be of high quality and suitable to accommodate pedestrians from all walks of life.</p> <p>The cycle parking condition should include the requirement for the applicant to deliver cycle parking in line with the minimum standards identified within the publication London Plan and London Cycle Design Standards (LCDS).</p> <p>In terms of the contribution for cycleway 4, I have been advised that the costs for the works outside the proposed development is approximately £150,000. Noting the emphasis that the applicant is placing on modes sustainable and active travel, it is therefore considered appropriate that the applicant contributes to the delivery of these works. In line with Policy T4 of the London Plan, a contribution of £75,000 is requested.</p>	<p>parking pay to a disabled persons parking bay for use by the hotel would not be supported by the Council's highways and transport officers as parking stress in the area is relatively high.</p> <p>It should be further noted that the application site does not include the surrounding hard landscaping and pavements, which have been upgraded relatively recently as part of the wider works for the whole site. As such, level access exists for Copperas Street and Creek Road from the existing building.</p> <p>The suggested conditions have been included (see appendix 2) and a contribution towards Cycleway 4 has been agreed (see section 18 for the heads of terms).</p>
--	--	---

Council Departments

- 8.4 A summary of the responses received from internal consultees, together with officer's comments are set out in the table below:

Details of Representation	Summary of Comments	Officer's comments
<p>Flood Risk Manager</p>	<p>It is expected, in accordance with the NPPF, that SuDS will be provided in major developments, unless demonstrated to be inappropriate. The systems used should:</p> <ul style="list-style-type: none"> a) take account of advice from the lead local flood authority; b) have appropriate proposed minimum operational standards; c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and d) where possible, provide multifunctional benefits. <p>The Royal Borough of Greenwich (RBG) Local Plan: Core Strategy (2014) requires that surface water be managed in line with the London Plan's Drainage Hierarchy (Policy 5.13).</p> <p>We do not object to this planning application subject to conditions being attached to any consent if this</p>	<p>The suggested conditions have been included and a condition has been agreed to raise the floor levels of the ground floor sleeping accommodation to a minimum of 5.68m AOD (see appendix 2).</p>

	<p>application is approved by the LPA.</p> <p>It is recommended that the LPA attach a condition to secure that the development is implemented in accordance with the submitted Flood Risk Assessment and Drainage Strategy.</p> <p>(Odyssey, February 2020, Document Ref: 20-103)</p>	
<p>Pollution Control - Noise and Air</p>	<p>I have reviewed the Noise Impact Assessment and addendum (Addendum to Noise Impact Assessment - Ref AS8519.200622.TNI dated 24th June 2020 by Clarke Saunders').</p> <p>The assessment has looked at two receptors which look to be the closest so the noise level at the adjacent tower block should meet the criteria.</p> <p>This addendum note presents noise levels that meet the requested criteria. As such, the amenity of the communal gardens and the levels at the buildings windows should be preserved. However, this is subject to the necessary mitigation put in place which is noted to be in the form of screening as stated:</p> <p>"The plant will be installed within compounds having</p>	<p>The Noise Impact Assessment and subsequent addendum have been considered acceptable, and subject to the inclusion of conditions requiring the proposed mitigation to be implemented prior to the use of the hotel, the proposal would not cause significant harm to neighbouring properties (see appendix 2 for conditions).</p>

	<p>minimum 3m high sides of imperforate construction, minimum 8kg/m² superficial density. Plant items will be installed not more than 2m from the sides of the compound to maximise acoustic screening effects."</p> <p>We would want to ensure that there is no disturbance from vibration and the report has stated mitigation in the form of resilient mounts for vibration from the plant in Section 8.4.8.</p> <p>So subject to this assurance, this addresses the concerns raised and no further comments.</p>	
<p>Sustainability</p>	<p>All developments in Greenwich are required to comply with Local Plan policy DHI. In particular parts (vi) and (vii) of policy DHI require maximisation of energy conservation, through effective layout, orientation, use of appropriate materials, detailing and landscape design also in line with Policy EI and mitigation and adaptation to climate change.</p> <p>Local Plan policy EI - Carbon Emissions requires all new developments in Greenwich to demonstrate how the energy and carbon emissions will be reduced in</p>	<p>The recommended conditions have been included at appendix 2.</p>

	<p>line with the Mayor's Energy Hierarchy. We should encourage the applicant to achieve zero carbon in line with our Carbon Neutral Action Plan.</p> <p>Water efficient reduction measures should also be installed to achieve a maximum internal water consumption per day of 105 litres per person per day for the residential and a BREEAM excellent standard for the 'Wat 01' water category or equivalent for the non-residential space. This could be conditioned separately or as part of the BREEAM condition. Please see below wording for both for your consideration.</p>	
<p>Transport and Highways</p>	<p>The nearest railway station is at Deptford located approximately 780m to the west while Greenwich station and DLR is just over a 10-minute walk to the east. The site is within walking distance of 3 bus routes and overall is considered to have good access to public transport with a PTAL of 4.</p> <p>Creek Road is a heavily trafficked classified road and bus route subject to loading and waiting restrictions. It also forms a key cycle route.</p>	<p>A contribution towards Cycleway 4 has been agreed (see section 18 of the report – heads of terms) and conditions (see appendix 2) requiring the correct quantum and type of cycle spaces have been included.</p>

	<p>The development proposal is for the reinstatement of a previously granted change of use from mixed commercial uses to CI Hotel use, to include 123 rooms and is car free.</p> <p>As part of the submission a Transport Statement has been supplied and a parking study carried out. From the parking survey it revealed that while the surrounding streets are reasonably frequently parked, it is not envisaged that the proposed hotel use would give rise to an increase in parking. The majority of guests and staff are expected to arrive by public transport or private hire vehicle. No provision has been made on site for coach parking although this is not expected to occur on a regular basis if at all as the hotel will not accommodate coach/tour groups with this practice enforced and controlled at the booking stage.</p> <p>The proposed development is compliant with transport policy as set out in The Draft London Plan and the RBG Policies. The proposals is also compliant with TfL's Healthy Streets Guidance.</p>	
--	---	--

	<p>Servicing could be carried out from Copperas Street.</p> <p>In addition, a contribution towards Cycleway 4 should be secured through a s106 agreement.</p> <p>On balance, no highway objection is raised.</p>	
Waste Services	<p>The waste and recycling capacity are satisfactory. However, it is noted that bins are to be collected from Copperas Street. It is known that Copperas Street is narrow, long dead end and often busy with parked cars. The applicant has subsequently confirmed, through the submission of tracked vehicle movements, that refuse collection vehicle can access the bins, turn and exit in a forward gear without excessive reversing.</p>	<p>Refuse and recycling facilities are considered acceptable, with collection to take place from Copperas Street.</p> <p>This will be secured on any grant of planning permission and the wording of the condition can be seen in Appendix 2.</p>

Amenity Groups

- 8.5 A summary of the responses received from internal consultees, together with officer's comments are set out in the table below:

Details of Representation	Summary of Comments	Officer's comments
The Greenwich Society	The proposed change of use from mixed commercial to hotel is acceptable in principle although the pedestrian route to the town centre along Creek Road is	The proposed hotel model, and access to natural light for guests are not material considerations which form part of the

	<p>environmentally unfriendly and there are no restaurants close to the site. There are features of the proposal which we find objectionable:</p> <ol style="list-style-type: none"> 1. The 123 rooms are said to be windowless which offers a very poor experience for visitors to Greenwich; 2. The rooms are small and, together with the lack of windows and all but the most basic services, raises the question of what sort of destination Greenwich aspires to be. The hotel will be similar to ones that are usually sited on the outskirts of towns/centres. 3. The proposal to apply vinyl stickers to the external windows is likely to look tawdry, as evidenced by the two examples currently in place on the Creek Road façade; 4. It is unsatisfactory that the accessible room are all on the first and second floors and none on the ground floor. <p>This is a very poor design creating very unappealing accommodation. OBJECT</p>	<p>assessment of this application. In addition, the revised design proposal includes sections of green wall and sections of externally applied adhesives, etched with designs which reflect the site's location close to Greenwich town centre. 13 wheelchair accessible bedrooms are proposed, which equates to just over 10% of the overall proposal and therefore meets the requirement of Policy E10 of the London Plan.</p>
--	---	--

Local Residents and Businesses

8.6 Objections were received from 18 properties as a result of public consultation. Their responses, together with officer's comments, are set out in the table below.

Summary of Comments	Officer's comments
Lack of natural light and ventilation for guests cannot be supported.	This is not a material consideration.
Guests will be low-income, and therefore tourism benefits will be low.	There is no evidence to suggest that future guests will be low income or that the hotel would fail to support Greenwich as a tourist destination.
Noise Impact Assessment should assess mechanical ventilation and does not assess the rooftop garden or residents in the host building.	The Noise Impact Assessment has been updated through the technical note addendum to include an assessment of the rooftop garden and residential properties within the host building. This has been reviewed by the council's environmental protection team, which have concluded that with appropriate acoustic and vibration mitigation measures, the proposal would not cause significant harm.
This is a retrospective application which cannot be legal.	Retrospective applications must be assessed in the same way as prospective applications, and in any event, the internal works carried out do not constitute development, as defined by section 55 of the Town and Country Planning Act (1990), and therefore change of use is proposed.
The number and density of rooms is too high.	The number of rooms is considered appropriate for this edge-of-centre location. There is no planning guidance which sets out appropriate densities for hotel uses and as no harm has been identified, it is considered that the proposed density is acceptable.
The rooftop plant equipment would be too loud and cause vibrations, which would harm residents' amenity, and the proposed mitigation measures are not sufficient.	The Noise Impact Assessment has been updated through the technical note addendum to include an assessment of the rooftop garden and residential properties within the host building. This has been reviewed by the council's environmental protection team, which

	<p>have concluded that with appropriate acoustic and vibration mitigation measures, the proposal would not cause significant harm.</p>
<p>The proposal would lead to the loss of business floorspace.</p>	<p>The consented uses of the site include A1-A5, B1 and D1 uses which broadly encompass retail shops, professional services, restaurants, pubs, takeaways, offices and non-residential institutions. The various uses and job densities are discussed later in this report, however a hotel is still a commercial use.</p>
<p>Deliveries and servicing from Copperas Street is not convenient and will lead to frequent noisy gridlocks.</p>	<p>The council's highways team and waste services team have reviewed the submitted details, including the tracked vehicle movements for refuse collection vehicles and consider the delivery and servicing arrangements from Copperas Street to be appropriate.</p>
<p>Water pressure in the building is not sufficient.</p>	<p>Generally, water pressure is not a material planning consideration (as it is controlled by other legislation), however it should be noted that within the BREEAM assessment, it would be expected that the proposal achieves at least the BREEAM excellent standard for the 'Wat 01' water category or equivalent.</p>
<p>Increased risk of flood and fire and delayed evacuation time.</p>	<p>Flood risk has been assessed in detail by the EA and the council's flood risk manager, and subject to raising the floor level of the ground floor sleeping accommodation to 5.68m AOD, flood risk is considered to be minimised.</p> <p>In addition, a condition has been included detailing how fire risk is minimised, recognising that significant building work will be unsuitable for this change of use application.</p>

Insufficient parking spaces have been provided and there is nowhere for taxi drop-offs.	It is considered that a car-free proposal is acceptable in this instance, and to encourage the uptake of active modes of transport, a contribution towards cycleway 4 has been agreed with an acceptable level of on-site cycle parking.
External elevations are out of resonance with the colour scheme of the remainder of the development.	The external façade has been amended throughout the application process to better reflect the site's context and to introduce interest in the form of sections of green wall. This is considered to be an acceptable solution.
Proposed hotel model does not seem financially viable.	This is not a material consideration.
Proposal would not meet health and safety standards.	The proposal is considered to generally comply with planning legislation and relevant policies.
Access to the hotel from Copperas Street will cause a noise nuisance.	The noise impacts of the proposal have been assessed and are considered to be acceptable.
The submitted CMP is inaccurate, and the works have all been carried out.	The retrospective nature of the application is understood, and it is known that several complaints to the council's environmental protection team have been made whilst the internal works were carried out partly before and during lockdown. If this application is approved, controls on the methods and times of permitted construction will be managed through the agreed CMP, included as a condition, however the internal works carried out so far do not require planning permission and therefore no planning controls can be applied.
Site will be used to house vulnerable people and children, and the site is unsuitable for this.	The current proposal is for a hotel use.

9. Planning Context

9.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that when determining a planning application, regard is to be had to the development plan, and the determination shall be made in accordance with the development plan, unless material considerations indicate otherwise.

9.2 The development plan for the Royal Borough of Greenwich comprises the following documents, and for full details of relevant policies, refer to Appendix 2:

- The London Plan (2021)
- Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014)

9.3 In addition to the development plan, the Royal Borough of Greenwich has adopted the following relevant Supplementary Planning Documents (SPDs):

- Planning Obligations (s106) Guidance SPD (2015)
- Greener Greenwich SPD (2014)

9.4 Also, material considerations in determining planning applications are:

- The National Planning Policy Framework (NPPF) (2019)
- The National Planning Practice Guidance (NPPG)
- The Human Rights Act (1998)
- The Equalities Act (2010)

10. Material Planning Considerations

10.1 This section of the report provides an analysis of the specific aspects of the proposed development and the principal issues that need to be considered in the determination of the planning application:

- Principle of development;
 - Sequential Test
 - Existing and Proposed Uses
- Design Quality
- Impact on Existing Residential Amenity
 - Loss of light, outlook and privacy
 - Noise
- Transport, Parking and Access;

- Waste and Refuse Provision;
- Sustainability and Energy;
- Flood Risk;
- Legal Agreement; and
- Public Sector Equality Duty (PSED) and Human Rights

11. **Principle of Development**

- 11.1 The National Planning Policy Framework (NPPF) is a set of national guidelines from which the principles of modern planning are cascaded into local planning policy and is a material consideration in the determination of planning decisions. At the heart of the NPPF is the presumption in favour of sustainable development, which has three overarching interdependent objectives; economic prosperity, social inclusion and environmental enhancement.
- 11.2 The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development, and it requires the Council to make the most effective use of land for homes and other uses whilst safeguarding and improving the environment, ensuring safe and healthy living conditions, and maximising the re-use of previously developed 'brownfield' land.
- 11.3 Of specific relevance to the proposal is Chapter 7 of the NPPF (Paragraphs 85 - 90): Ensuring the vitality of town centres. The NPPF highlights in this chapter (at paragraph 86) that local planning authorities should apply a sequential test to planning applications for main town centre uses, such as hotels, which are neither in an existing centre nor in accordance with an up-to-date plan. When considering edge of town centre or out of town centre proposals, preference should be given to accessible sites which are well connected to the town centre.
- 11.4 The sequential test required by the NPPF should be proportionate and appropriate to the proposal, and should discuss the potential suitability of alternative sites within nearby town centres. Planning Practice Guidance (PPG) advises that the sequential test should demonstrate that the suitability of more central sites has been considered, with a reasonable justification for why these sites are considered less suitable. The sequential test should further consider what contribution more central sites are able to make individually to accommodate the proposal. If there are no suitable sequentially preferable locations, then the sequential test is passed.

- 11.5 Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification will need to be provided where this is the case, and land ownership does not provide such a justification. Passing of the sequential test does not necessarily mean that a proposal is acceptable, and compliance with the London Plan and the Core Strategy will still need to be demonstrated.
- 11.6 Policy GG2 (Making the best use of land) and GG5 (Growing a good economy) of the London Plan encourage the development of brownfield land within and on the edge of town centres, prioritising sites which are well connected by public transport, whilst diversifying London's economy by promoting and supporting London's rich cultural and historical assets and its role as a 24 hour city.
- 11.7 Policy SD6 (Town centres and high streets) states that tourist infrastructure, attractions and hotels in town centre locations, especially in outer London, should be enhanced and promoted whilst Policy SD7 (Town centres: development principles and Development Plan Documents) states that boroughs should take a town centres first approach, discouraging out-of-centre development of main town centre uses by applying the sequential test to applications for main town centre uses. Where edge-of-centre developments of retail, leisure and office uses are proposed, and are not in accordance with the Development Plan, these should be accompanied by a robust and detailed impact assessment if the proposal exceeds 2,500 m².
- 11.8 Policy SD6 further states that development plans should create policies for edge-of-centre areas, revising the extent of shopping frontages where surplus to forecast demand and introducing greater flexibility, permitting a range of non-residential uses taking into account local circumstances. Moreover, the redevelopment, change of use and intensification of identified surplus office space is supported where justified by supporting evidence.
- 11.9 Policy E9 of the London Plan (Retail, markets and hot food takeaways) sets out that boroughs should provide a policy framework to enhance local and neighbourhood shopping facilities and prevent the loss of retail and related facilities that provide essential convenience and specialist shopping, whilst the redevelopment of surplus retail space should support other planning objectives and include alternative town centre uses on the ground floor where viable. It is of note that Policy E9 introduces stricter requirements for proposals containing A5 hot food takeaway uses and states that these should not be permitted where these are within 400 metres walking distance from

the entrances and exits of an existing or proposed primary or secondary school. Boroughs should also carefully manage the over-concentration of A5 hot food takeaway uses within town centres and other areas in order to create a healthier food environment.

- 11.10 Policy E10 of the London Plan (Visitor infrastructure) sets out that London's visitor economy and associated employment should be strengthened 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. The special characteristics of major clusters of visitor attractions and heritage assets and the diversity of cultural infrastructure in all parts of London should be conserved, enhanced and promoted and a sufficient supply and range of serviced accommodation should be maintained. 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) where they are well-connected by public transport, particularly to central London.
- 11.11 Policy E10 further sets out that to ensure sufficient choice for people who require an accessible bedroom, development proposals for serviced accommodation should provide either 10% of new bedrooms to be wheelchair-accessible in accordance with Figure 52 incorporating either Figure 30 or 33 of *British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice* or 15% of new bedrooms to be accessible rooms in accordance with the requirements of 19.2.1.2 of *British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice*.
- 11.12 Policy EA5 of the Royal Greenwich Local Plan states that the expansion and diversification of Greenwich's tourism industry will be supported, with special regard to the Maritime Greenwich World Heritage Site (WHS), the Peninsula and the Royal Arsenal as a major tourism centre for the Thames Gateway. To achieve this, the development of hotels, particularly in town centres and the waterfront area, will be supported and tourist facilities should be well served by public transport. In addition, Policy EA(a) of the Royal Greenwich Local Plan seeks to maximise the contribution to employment from existing sites.

11.13 Sequential Test

- 11.14 Both the NPPF and the London Plan require development proposals for town

centre uses outside of town centres to pass the sequential test for determining the most appropriate locations for certain uses.

- 11.15 As outlined in the NPPF (2019) the sequential test applies in relation to main town uses, which includes hotels. The sequential test is identified in paragraph 86 and sets out that 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.
- 11.16 Paragraph 87 further sets out that when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre and there should be flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.
- 11.17 Definitions of “town centre”, “edge of centre” and “out of town” are given in Annex 2 to the NPPF, and an ‘edge-of-centre’ development is defined as a location that is within 300 metres of a town centre boundary.
- 11.18 The Site lies approximately 225 metres east of Deptford Town Centre boundary and approximately 160 metres west of the defined Greenwich District Centre boundary. Accordingly, the proposal is considered to be an ‘edge-of-centre’ development, and the sequential assessment need only consider alternative locations within town centres.
- 11.19 As set out above, the sequential test is passed if there are no suitably sequential-preferable locations, considering principally what contribution more central sites would be able to make individually to accommodate the proposal. Some flexibility can be applied to the proposal’s individual requirements however alternative sites should be of a similar scale and size and should be suitable to accommodate the proposal without major amendments to be considered more appropriate. When judging availability, the NPPF requires a consideration of sites that are available or expected to become available within a reasonable period. PPG further explains that when considering what a reasonable period is for this purpose, the scale and complexity of the proposed scheme and of potentially suitable town or edge of centre sites should be taken into account.
- 11.20 The sequential test carried out by the applicants sought to identify sites which could accommodate a change of use and conversion of a similar scale (approx. 123 bedrooms), on sites of 20, 000 sqft (1,858 m²), which would be

available within two years. At 1,858 m², the sequential test carried out includes sites smaller than the proposal to ensure there is some flexibility in the assessment as required by the NPPF.

- 11.21 The sequential test identifies 2 sites within Deptford District Centre, 2 sites within Greenwich District Centre and 1 within East Greenwich District Centre, however Lewisham Town Centre has not been included as sites in this location would not address the identified need for hotels within the Royal Borough of Greenwich and in particular the waterfront area. Whilst Deptford does not lie within the Royal Borough of Greenwich, given its very close proximity to the site and the small distance between Deptford and historic Greenwich, it is considered that sites in Deptford could serve to support tourism within the borough and therefore should be included in the assessment of site suitability.
- 11.22 It should be noted that the number of sites assessed is relatively low, and this is because only sites which can accommodate a change of use and conversion, rather than potential redevelopment opportunities, have been considered. Planning Practice Guidance advise that whilst some flexibility to the form and scale of the proposal should be applied to ensure that all potential sites are captured in the assessment, material considerations include suitability, accessibility, availability and viability. Redevelopment of a site compared to conversion would have severe implications in terms of viability, and in any case, would not be similar to the current proposal. As such, whilst this exclusion criteria severely limits the number of sites captured by the assessment, it is considered appropriate in this instance.
- 11.23 The sequential test of the sites identified within the selected criteria (at least 1,858 m² and can accommodate approximately 123 rooms, with necessary supporting uses have been assessed), and it is concluded that the sites assessed within town centre locations are either unavailable within an acceptable timeframe or because of existing consents, unsuitable in terms of the specific requirements of the proposed hotel model, unviable because of financial constraints (or a combination of the three), and the most sequentially preferable site within the sub-region for a change of use to a proposed hotel at the proposed scale is the application site. It is therefore considered that the sequential test is passed in accordance with the requirements of the NPPF and Policy SD7 of the London Plan.

11.24 Existing and Proposed Uses

- 11.25 The proposed development seeks to introduce a hotel use onto the site,

across the first three floors, which would result in a loss of approximately 2,300 m² of flexible-use floorspace and the introduction of a 123-bedroom hotel. As such, the principle considerations for the proposal are whether the loss of this employment-generating floorspace is acceptable, and whether the proposed hotel use would be appropriate in this location.

- 11.26 Policy EA(a) of the Core Strategy seeks to ensure that the contribution to employment from sites in existing or previous employment use is maximised and will resist the loss of employment-generating uses. In this instance, despite completing in 2011, the commercial floorspace at ground, first and second floors have never been used and have remained vacant for their lifetime.
- 11.27 A number of uses are consented for the site, including A1-A5 uses, B1 and D1, with no restrictions on the amount of floorspace dedicated to each consented use. As such, it is difficult to predict the likely amount of jobs which would be generated across the site, recognising that the site would be unlikely to operate as one use, and would likely be subdivided into a number of smaller units, with a range of uses.
- 11.28 Of the permitted uses, some, such as offices (B1) could provide a high job density, whereas A1-A5 uses typically provide less jobs comparatively, with non-residential institutions (D1) providing relatively low levels of job creation. The proposed hotel use is likely to create a similar level of jobs to a D1 use across the same floor area but would provide substantially less jobs than if there was a high take-up of the space as offices.
- 11.29 This is discussed within the Planning Statement, where the various uses and their estimated job yields are set out, based on the Homes and Communities Agency Employment Density Guide (2015), and this table is reproduced below:

	GIA	NIA	Density Assumption	Density Rate	FTE
A1	2,261	1,583	EDM median for High Street / Food Store	11	144
A2	2,261	1,583	EDM Figure	17.5	90
A3 - A5	2,261	1,583	EDM median for A3 use	17.5	90
B1	2,261	1,583	EDM average of densities of general office/call centres	11	144
D1	2,262	1,583	EDM figure for Mixed Use Venue	125	13
	GIA	Bedrooms	Density Assumption	Density Rate	FTE
C1	2,261	123	EDM for limited service hotels	1 per 5 beds	25

Figure 5.2: Employment Density Calculations

- 11.30 As demonstrated by the table above, there is the potential for the site to be utilised at various employment densities, including comparatively high yields of 144 Full Time Equivalent (FTE) jobs for A1 (retail) or B1 (offices) or 90 FTE jobs for A2 (professional and financial services) or A3-A5 (restaurants/pubs/takeaways). It is however noted that the proposed job density of 25 FTE jobs is greater than if the space were used entirely for D1 (community uses) which would produce a comparatively low yield of 13 FTE jobs.
- 11.31 On the basis of the above, if permission were granted for the change of use, there would be some loss of high-potential employment-generating floorspace, and as such there is some conflict with part of Policy EA(a) of the Core Strategy.
- 11.32 It is relevant, however, that the commercial parts of the building have remained vacant since their completion in 2011, with seemingly little market interest in use of the site for any of the consented uses. No details of marketing for the current uses have been provided, with the most recent marketing efforts for the existing uses on the site having taken place prior to the submission and approval of application reference 11/2563/F. Following approval of 11/2563/F, the site was purchased by a hotel operator with an extant permission to use the ground, first and second floors as a hotel, with an intention to implement shortly thereafter, and there was therefore no reason for the applicant to actively market the site for other uses. However, the consent ultimately lapsed, with only some internal works having been completed which did not constitute development.
- 11.33 A subsequent application, essentially looking to renew the previous consent, was submitted in 2016 (application reference 16/2938/F) but was finally disposed of in April 2019 after a significant period of inaction, but it is clear that the applicant's intention has been to pursue a hotel use on this site since the site was purchased with an extant permission. It is also apparent from the approval of a previous application that the local planning authority considered the site suitable for a hotel, and whilst this change of use was granted before the adoption of the NPPF (2019), the current London Plan (2021), and the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014), the previous consent is a material consideration.
- 11.34 Broadly speaking, the site is considered to be suitable for a hotel use, well connected to both Deptford and Greenwich Centres, with a PTAL of 4. In addition, having regard to Policy E10 of the London Plan and Policy EA5 of the Core Strategy, it is recognised that the proposed use would be

compatible with the aims of enhancing both London's and Greenwich's tourism industry, being sited in close proximity to the historic setting of Greenwich, including the maritime Greenwich WHS, the strategic cultural areas identified in the London Plan, and a relatively short distance from the waterfront, all of which have been identified as areas which are most likely to be suitable for hotels.

- 11.35 Whilst it is recognised that the proposal would result in the loss of potentially high-density employment floorspace, the commercial elements of the site have remained vacant since its completion in 2011 and at present, the site provides no benefit to the local economy or community, representing an underutilised stretch of Creek Road between Greenwich and Deptford Town Centres. Moreover, because of its location outside of a designated town centre (albeit falling part way between two in relatively close proximity to each other), the existing commercial frontage does not form part of an established parade so its loss would not lead to a visual break or an incongruous gap between shops or businesses.
- 11.36 It is further recognised that a hotel use, whilst providing a lower level of direct employment opportunities than offices or retail, supports the wider economy of an area, particularly areas such as Greenwich where both domestic and international tourism are significant contributors to the local economy. In addition, there is a clear drive within the London Plan to encourage hotels outside of central London to ensure a more equal distribution of tourists, and whilst historic Greenwich is already an established destination, the proposal would contribute to its continued role as a tourist destination outside of central London.
- 11.37 As such, subject to passing the sequential test (which as considered above is appropriate), it is considered that the proposal is acceptable in land use terms, and would generally be a positive development which would bring forward a site which has remained vacant for a significant period of time, thereby contributing to the local economy and improving the visitor infrastructure in the borough and the wider area.
- 11.38 Moreover, the general thrust of Policy E10 of the London Plan and Policy EA5 of the Royal Greenwich Local Plan seeks to support the provision of additional visitor accommodation in areas which would support clusters of tourist destinations, namely historic Greenwich including the Cutty Sark, Maritime Greenwich and the Royal Observatory. In this regard, it is considered that the proposed use would be appropriate and would represent

a sustainable location for a hotel, being ideally suited to serve historic Greenwich by foot, bicycle and public transport.

12. **Design Quality**

- 12.1 Policy D3 of the London Plan (Optimising site capacity through the design-led approach) states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site whilst the design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth.
- 12.2 As such, development proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape with due regard to existing and emerging street hierarchy, building types, forms and proportions, should encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings that are aligned with peoples' movement patterns and desire lines in the area.
- 12.3 Proposals should further respond to the existing character of a place by identifying the special and valued features and characteristics that are unique and should be of a high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well whilst allowing every new development to make the most efficient use of land by optimising site capacity. This means ensuring the development's form is the most appropriate for the site and land uses meet identified needs.
- 12.4 Policy DHI of the Royal Greenwich Local Plan sets out that all developments are required to be of a high quality and should demonstrate that they contribute positively to both the built and natural environment. To achieve this aim, development should promote local distinctiveness by providing a site-specific design solution, and should provide a positive relationship between the proposed and the existing urban context by respecting the architecture of surrounding buildings, the quality and nature of materials, established layout and special character, the scale, height, bulk and massing of

the adjacent townscape, and the architectural and historic features as well as making effective use of land.

- 12.5 The proposed development, being a change of use, does not seek to enlarge, extend or expand the scale of the existing building, nor increase its footprint or height, however does seek to change the façade at ground, first and second floor level. The proposed hotel, as set out in the planning statement, seeks to block up the existing windows to restrict natural light and external noise to rooms, supporting their hotel model based on “simplicity”, a “perfect night’s sleep” and “well-being”.
- 12.6 The existing façade of Cavatina Point comprises transparent glass panelling across the ground, first and second floor (corresponding with the floorspace for the consented commercial uses) with a mixture of partially obscured glass interspersed with transparent glass panels above (corresponding to the residential floorspace at higher levels). This contemporary finish is somewhat at odds with the prevailing brick and render palette of the surrounding area, and later developments such as Union Wharf have utilised softer brick tones, however the site as whole blends well with the award-winning Trinity Laban centre on Copperas Street to the rear and sits relatively comfortably when viewed together in the context of the well-maintained public realm and the gardens within Trinity Laban.
- 12.7 The fully glazed façade provides an opportunity for retail uses, and other uses with an active shopfront, to encourage and promote a sense of activity typically associated with shops. As such, the existing façade is appropriate for some of the consented uses of the site. As the proposal comprises a change of use to a hotel, it is therefore reasonable to seek alterations to the façade which would be consistent with the proposed hotel use.
- 12.8 As set out above, the proposed business model for the hotel seeks to block natural light from rooms, to encourage better sleep, and consequently, design amendments are required to the bottom three floors of Cavatina Point. Initially the proposal included a bland and monotone treatment of opaque vinyl applied to the outside face of the existing glazed curtain walling thus removing any view from the street into the rooms within. The vinyl would have had imagery etched into its’ surface similar to the advertisement used for nearby shops.
- 12.9 Whilst the use of a vinyl adhesive could be suitable, the proposed external treatment was considered to be an unacceptable design solution, which would neither positively respond to local distinctiveness through its

appearance or respond to the specific architectural or historical location and would not make use of attractive, robust materials which weather and mature well and are appropriate for their lifetime.

- 12.10 Subsequent amendments to the external façade were sought, recognising that opportunities to help integrate the proposed use through softer, less contemporary materials or through significant alterations to the external building fabric or footprint are not possible as the building is complete, and any external alterations would need to continue to complement the materials at higher levels.
- 12.11 The amended proposal retains the externally-applied adhesive vinyl however the detailed design now depicts images related to the history of Maritime Greenwich, providing an appropriate response to the site's location. To break up the continuity of the long commercial frontage, six vertical segments of living wall, created from a combination of greenery that could include plants, grass, moss and floral additions, will be applied to six window panels. These elements, whilst modest in size, are considered to provide good relief to the hotel frontage, complementing the mix of contemporary materials and access to nature employed at Trinity Laban and would welcome insect wildlife thereby making minor, but proportionate, contributions to biodiversity, having regard to the scope of the application.
- 12.12 Moreover, it is considered that the proposed design solution is more representative of the proposed use, responding to the site's location with a muted frontage but providing some, albeit low, level of activity and engagement. It is considered that this will allow the proposed hotel to ground itself within its surrounding context and present both a unique and identifiable imagery for the hotel whilst at the same time providing a continuity of the existing building façade.
- 12.13 On the basis of the above, the proposal is considered to be acceptable in design terms, consistent with Policy D3 of the London Plan and DH1 of the Royal Greenwich Local Plan.

13. **Impact on Existing Residential Amenity**

13.1 **Loss of Light, Outlook and Privacy**

- 13.2 Policy E10 of the London Plan states that the provision of serviced accommodation should be resisted where this compromises local amenity or the balance of local land uses.

- 13.3 Policy DH(b) of the Royal Greenwich Local Plan sets out that new developments will only be allowed where it can be demonstrated that the proposed development does not cause an unacceptable loss of amenity to adjacent occupiers by reducing the amount of daylight, sunlight or privacy they enjoy or result in an unneighbourly sense of enclosure.
- 13.4 As set out above, the design alterations would see vinyl adhesives applied across the façade with segments of green wall, and as such, there would be no loss of privacy. Similarly, as no external alterations are proposed which would increase the buildings size, there would be no loss of outlook or natural light to nearby residents.
- 13.5 **Noise**
- 13.6 Policy D13 (Agent of Change) of the London Plan introduces the ‘Agent of Change’ principle, which places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development and requires local authorities to take account of existing noise and other nuisance-generating uses in a sensitive manner when new development is proposed nearby. Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.
- 13.7 Policy D13 further states that new noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses. Development proposals should manage noise and other potential nuisances by ensuring good design mitigates and minimises existing and potential nuisances with necessary and appropriate provisions including ongoing and future management responsibilities, and proposals should seek to separate new noise-sensitive development from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.
- 13.8 Policy D14 of the London Plan (Noise) sets out that proposals should mitigate and minimise the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses, improving and enhancing the acoustic environment and promoting appropriate

soundscapes. Proposals should first seek to separate new noise-sensitive development from major noise sources through the use of distance, screening, layout, orientation, uses and materials, in preference to sole reliance on sound insulation. Where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles, promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

- 13.9 Policy E(a) of the Royal Greenwich Local Plan sets out that planning permission will not normally be granted where a proposed development or change of use would generally have a significant adverse effect on the amenities of adjacent occupiers or uses, and especially where proposals would be likely to result in the unacceptable emission of noise, light, vibrations, odours, fumes, dust, water and soil pollutants or grit.
- 13.10 A Noise Impact Assessment (NIA) has been submitted with the application, which was subsequently updated through the Technical Advice Note addendum. The NIA includes an assessment of noise emissions from new condensing plant at roof level, consideration of operational noise from the service yard and sound insulation between the hotel and residential use above.
- 13.11 Whilst each case is assessed on its own merits, the council's environmental protection team advise that development proposals should seek, either through passive design or through the use of mitigation measures, to ensure that the existing background sound level will not increase when measured one metre from the façade of the nearest noise sensitive premises.
- 13.12 In order to achieve this, mechanical plant equipment and ventilation should be designed, or the noise from the plant should be attenuated, so that it is 10dB below the existing background level (LA90 15min), assessed in accordance with *British Standard 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound*.
- 13.13 *BS 4142:2014+A1:2019* provides a method of assessing the impact of a source of industrial or commercial sound including sound from industrial and manufacturing processes, fixed installations, the loading and unloading of goods and mobile plant and vehicles, and is therefore appropriate for this assessment.

13.14 *BS 4142:2014+A1:2019* uses a 'rating level', which is based on a comparison between the sound which is being assessed and the background sound which would exist without it. The rating level is then modified by any corrections for the character of the sound, be that tonal, impulsive, or intermittent. The results of the impact assessment are considered with respect to the context in which the noise will be heard, and the impact assessment is modified appropriately to provide a final assessment which takes account of the 'context'.

13.15 The guidance within *BS 4142:2014+A1:2019* indicates suitable noise levels for various activities within residential and commercial buildings and the relevant sections of this standard are shown in the following table:

ACTIVITY	LOCATION	07:00 TO 23:00	23:00 TO 07:00
Resting	Living Room	35 dB <small>L_{Aeq, 16 hour}</small>	-
Dining	Dining Room	40 dB <small>L_{Aeq, 16 hour}</small>	-
Sleeping (daytime resting)	Bedroom	35 dB <small>L_{Aeq, 16 hour}</small>	30 dB <small>L_{Aeq, 8 hour}</small>

13.16 The initial NIA identified the closest residential receptors to the new mechanical plant as the upper floors of Vertex Tower located to the west of Cavatina Point, and the upper floor of Adagio Point to the east. The receptors are approximately 19m away from the proposed 'west' and 'east' plant areas, respectively. The NIA addendum subsequently also assessed impacts on the upper windows of the host building and the surrounding rooftop garden.

13.17 As part of this application, it is proposed that the mechanical plant be installed within compounds which have minimum 3 metre high sides of imperforate construction and minimum 8kg/m² superficial density. In addition, mechanical plant items would be installed not more than 2m from the sides of the compound to maximise the acoustic screening effects.

13.18 Analysis of the NIA indicates that losses associated with distance and screening, expected from the compound walls and building roof edges, provide sufficient noise attenuation to meet the required noise limits for both daytime and night-time operation.

13.19 The resultant noise levels are significantly below the target of LAeq 55 dB (ranging from peaks of 18-50 dB for adjacent buildings, 26-28 dB for the host building and 35-37 dB within the rooftop garden). It should be noted that the

highest balconies on the host building are one floor below the top floor windows, and as such, the noise levels on the balconies would be lower still.

- 13.20 The lower levels of the hotel are considered to be the most-affected receptors of noise from the service yard located at the rear of the building, with the assumption that if the closest habitable rooms within the hotel are acceptable, then the upper floors of the residential properties would also be acceptable.
- 13.21 The predicted noise level due to delivery and service noise, expected to occur up to three times day, is 35dB within the nearest noise sensitive premises when windows are open. This is in accordance with guidance offered by BS8233:2014. The impact of operational noise and delivery and servicing vehicles is therefore considered not to be significant.
- 13.22 It is further expected that sound insulation performance provided by the scheme achieves a 5dB improvement over the minimum requirements of Approved Document E Resistance to the passage of sound (ADE). In areas which may include regulated entertainment, an improvement of 10dB over ADE threshold would be the required. The NIA outlines appropriate sound insulation would be used and there would be no amplified music (other than low level ambient music) associated with the use. This result in a significant improvement above the minimum requirements.
- 13.23 As set out above, a number of uses are consented for the site, including A1-A5 uses, B1 and D1, with no restrictions on the amount of floorspace dedicated to each consented use. Whilst it has been satisfactorily demonstrated that the proposed development would not result in significant adverse impacts to neighbouring properties in terms of noise and nuisance, it is relevant that uses which could generate much higher levels of noise and nuisance, such as takeaways or restaurants, could operate from the site without the need for planning permission and therefore without the controls recommended as part of this permission.
- 13.24 Having regard to all of the above it is considered that the proposal is acceptable in terms of its impact on residential amenity and would not cause significant harm to neighbouring properties.

14. **Transport, Parking and Access**

- 14.1 Policy T1 of the London Plan (Strategic approach to transport) seeks development proposals to facilitate the delivery of the Mayor's strategic

target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

- 14.2 Policy T2 of the London Plan (Healthy Streets) requires development proposals to demonstrate how they will reduce the dominance of vehicles on London's streets whether stationary or moving, be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.
- 14.3 Policy T4 of the London Plan (Assessing and mitigating transport impacts) sets out that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. When required, transport assessments or statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed.
- 14.4 Policy T4 further explains that where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.
- 14.5 Policy T5 of the London Plan (Cycling) sets out that proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located.
- 14.6 Developments should provide cycle parking at least in accordance with the minimum standards, ensuring that a minimum of two short-stay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision. Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

- 14.7 For a hotel use, Policy T5 states that a minimum of 1 long-stay cycle space for every 20 bedrooms, and a minimum of 1 short-stay cycle space for every 50 bedrooms, will be required. As such, the proposed 123-bedroom hotel requires provision of at least 6 long-stay cycle spaces and 2 short-stay spaces.
- 14.8 Policy T6 of the London Plan (Car parking) states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. As such, car-free development should be the starting point for all proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free development has no general parking but should still provide disabled persons parking.
- 14.9 Policy T6.4 (Hotel and leisure uses parking) sets out that in locations of PTAL 4-6, any on-site provision should be limited to operational needs, disabled persons parking and parking required for taxis, coaches and deliveries or servicing.
- 14.10 Policy IM(c) of the Royal Greenwich Local Plan states that developments must provide the minimum level of car and cycle parking provision in accordance with the requirements of the London Plan, ensuring an appropriate level of parking is provided for people with disabilities and parking is provided for servicing, collection points and waiting areas if necessary. Policy IM(c) further states that developments in areas of high Public Transport Accessibility Levels (PTALs) and within Controlled parking Zones (CPZs) should be car free.
- 14.11 Policy IM(b) of the Royal Greenwich Local Plan requires new development to integrate with existing footpaths and cycle paths, to promote walking and cycling safety, and to have regard to the Royal Borough's Cycling Strategy.
- 14.12 The application site benefits from a Public Transport Accessibility Level (PTAL) of 4, on a scale of 0-6b, where 0 is the worst and 6b is the best. Consequently, the site is considered to have relatively good levels of public transport accessibility. Moreover, within short walking distance are several local amenities and tourist attractions, whilst Cycleway 4 is proposed to run past the site connecting Greenwich with Central London.
- 14.13 The development is proposed as being car-free, with no on-site or off-site spaces included as part of the proposal. This is considered to be acceptable in this instance, recognising that there are no opportunities to provide vehicle parking on-site, and the councils highways team have indicated that parking

stress in the area is relatively high and the loss of an existing off-street space for use by the hotel as a disabled persons bay would not be supported.

- 14.14 Cycle parking is proposed at ground floor level, accessed from the foyer and externally direct from the street, and whilst limited details have been provided of specifics, 10 spaces have been shown and there is enough room within the assigned area to accommodate and exceed the minimum cycle parking requirements. A condition will be included which requires the cycle spaces to be implemented in line with the London Cycle Design Standards, which allows for a range of cycle types to be accommodated.
- 14.15 In addition, in consultation with TfL, it is agreed that a contribution towards Cycleway 4 is necessary, noting that the proposal relies solely on active and public transport to access the site, and having regard to Policy T4 and T5 of the London Plan, which respectively seek to mitigate proposals' impacts on the highway network and support the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure complementing the level of cycle parking provision.
- 14.16 Cycleway 4 connects Greenwich to Tower Bridge and provides safe and convenient routes for cyclists (as well as improving the walking environment) in both directions. Temporary works to improve Cycleway 4 and provide connections further eastwards through east Greenwich to the Angerstein Roundabout have been carried out in response to the Coronavirus pandemic, and specifically relevant to this proposal, works to Cycleway 4 would see two-way segregated cycle lanes installed on Creek Road, and this is scheduled to take place in Spring 2021. TfL have requested a contribution towards its implementation of £75,000 and this is outlined in the Heads of Terms below.
- 14.17 In addition, the hotel would be serviced via the main entrance on the crossroad of Harmony Place and Bridge Walk off Copperas Street, subject to alterations agreed through a s278 agreement, with deliveries to be offloaded on the public highway on Copperas Street and transferred to the designated hotel storage rooms via the main entrance door. Deliveries and collections to the hotel would only be allowed between 08:00 and 18:00 hours on Monday to Fridays and 08:00 and 12:00 on Saturdays, with no deliveries or collections to the hotel on Sundays or Bank Holidays. All servicing and deliveries would be pre-booked and spread evenly throughout the day at off-peak times and between normal work hours to minimise the potential for any noise and disturbance to the nearby residents and hotel guests and to avoid several delivery vehicles arriving at the same time.

- 14.18 Having regard to the large open area to the south of Cavatina Point, it is considered that deliveries and servicing could be accommodated without causing an obstruction to local residents or pedestrians. In addition, deliveries would be relatively infrequent, and owing to the consented uses for the site, some of the potential uses would likely require deliveries in some capacity.
- 14.19 As such, it is considered that the proposal is acceptable in terms of its impact on the local highway network, and subject to the contribution towards Cycleway 4 and the provision of safe, convenient and accessible cycle parking spaces, the proposal would make a positive contribution towards the local walking and cycling environment.

15. **Waste and Refuse Provision**

- 15.1 Policy SI 7 of the London Plan (Reducing waste and supporting the circular economy) states that developments should be designed with adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.
- 15.2 Policy DHI of the Royal Greenwich Local Plan sets out that all developments will be expected to demonstrate on-site waste management, including evidence of waste reduction, the use of recycled materials and provide dedicated waste storage space.
- 15.3 The ground floor plan shows a waste storage area at ground floor level facing southwards towards the public square, with space for separate bins for general waste, mixed dry recyclable waste, bulky waste and clinical waste. Waste collection vehicles would collect waste via Copperas Street and hotel employees would bring the bins from the Refuse Store to the edge of Copperas Street in line with pre booked collection times. The bins would be returned to the refuse store as soon as they have been emptied by the waste collection vehicle.
- 15.4 The proposed details were assessed by the council's waste services team who requested that tracked vehicle movements for refuse vehicles accessing Copperas Street can reverse to within 25 metres of the designated collection refuse location and exit copperas Street in forward gear. This was subsequently demonstrated and consequently, waste services consider the proposals to be acceptable in terms of waste storage and collection.

16. **Sustainability and Energy**

- 16.1 Policy EI of the Royal Greenwich Local Plan requires all development to reduce demand for energy through its design and incorporate renewable energy generation within the proposal. Policy DHI of the Royal Greenwich Local Plan further sets out that non-residential buildings in should achieve a BREEAM rating of Excellent.
- 16.2 The Sustainability Statement provided as part of the planning application demonstrates the sustainability credentials for the proposed change of use from a commercial space to a 123-bedroom hotel. The statement also describes how the applicable sustainability policies and standards can be met by the proposed design, in accordance with the BREEAM 2014 Non-Domestic Refurbishment and Fit Out Assessment and a BREEAM pre-assessment has been also submitted.
- 16.3 Due to change of use nature of the proposal, the building has a number of limitations including no bedroom windows, no space to attenuate the surface water runoff, no external landscaped areas due to no available external space, the limited number of available windows does not allow passive cooling and natural ventilation, and the existing shell has been built to the previous standard (Part L 2016) which does not allow enough credits to be achieved under the current standards (energy Ene01 category).
- 16.4 Based on the above limitations, the design team have demonstrated through the BREEAM Pre-Assessment that a score of between 53.95% (Good) and 65.32% (Very Good) can be achieved subject to further detailed design evidence assessment.
- 16.5 Based on the above, the Statement demonstrates that the building will meet good standards of sustainable design and construction including low energy lighting both externally and internally, energy efficient white goods of 'A' rating, efficient gas heating through a communal heating network, mechanical ventilation with heat recovery (MVHR), monitoring procedures to report progress against the sustainability targets, energy sub-meters, energy efficient lifts, energy efficient cold storage refrigeration equipment, environmentally friendly and responsibly sourced materials where possible using the BRE's Green Guide to Specification targeting rating of A/A+ and insulation materials with Global Warming Potential of less than 5 and post occupancy evaluation.

- 16.6 Water efficient devices are proposed to reduce the internal water consumption to 40% less than the baseline and water meters on the main water supply and a water leak detection system will also be provided.
- 16.7 However, a number of potential credits, including renewable/ low carbon technologies, thermal comfort modelling, security of the building, transport accessibility index, proximity to amenities, and a SUDS strategy are outlined as open for investigation during the detailed design process.
- 16.8 Whilst the constraints of the site and the change of use nature of the application impose some constraints on the site which mean achieving the target BREEAM score are difficult, Policy DH1 of the Local Plan makes clear that the target BREEAM score is 'Excellent' for all developments. In some instances, where site constraints make this impossible, and this has been satisfactorily demonstrated to be either unfeasible or unviable, or other material considerations outweigh this policy conflict, a lower target score can be agreed.
- 16.9 In this instance, whilst it may ultimately prove unviable, it is considered that a target of Excellent is appropriate and the proposal should further demonstrate how additional BREEAM credits can be gained. If an 'Excellent' rating demonstrably cannot be achieved, then the scheme must demonstrate that 'Very Good' can and will be achieved. A condition has been included which requires the proposal to target a BREEAM rating of 'Excellent' and to demonstrate compliance prior to occupation.

17. **Flood Risk**

- 17.1 Chapter 14 of the NPPF outlines that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. In this regard, it should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience, encourage the reuse of existing resources, including the conversion of existing buildings and support renewable and low carbon energy and associated infrastructure.
- 17.2 New development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change, and when new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.

- 17.3 National Planning Practice Guidance (NPPG) sets out that changes of use may still increase flood risk if the vulnerability classification of the development gets more severe. In this instance, the proposed use is classified as ‘more vulnerable’, which broadly encompasses residential settings and places with overnight accommodation, whereas most of the consented uses (shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices) are classified as ‘less vulnerable’. Some consented DI uses could potentially be classified as ‘more vulnerable’ however no consented use would allow for ground floor sleeping accommodation and it is considered that the proposal would represent an increase in flood risk classification.
- 17.4 Policy SI 12 of the London Plan (Flood risk management) states that current and expected flood risk from all sources across London should be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure providers. In addition, development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed.
- 17.5 In addition, Policy E2 of the Royal Greenwich Local Plan requires that developments be safe in terms of layout, form, floor levels, access, egress and refuge, and that the consequences and probability of flooding be reduced wherever possible, without increasing the risk of flooding elsewhere.
- 17.6 The application site lies within Flood Zone 3 (benefitting from flood defences) and as such, is considered at high risk in the event of a flood event which breaches the Thames’ tidal defences, and the proposed use is considered to be more vulnerable to a flood event (as it includes sleeping accommodation). As such, in consultation with the Environment Agency (EA), it has been agreed that sleeping accommodation below 5.58m Above Ordnance Datum (AOD) (sea level) will not be allowed unless fully passive flood resilience measures can be put in place, however this is not feasible given the constraints of the site and the change-of-use nature of the application.
- 17.7 Noting that the internal works to facilitate the change of use have been largely completed, a condition which requires the ground floor level of all sleeping accommodation to be raised to a minimum of 5.58m AOD prior to the first use of the ground floor has been agreed between the applicants, the local planning authority and the EA as an acceptable solution which would allow permission to be granted and allow parts of the site at low risk to commence operation.

17.8 As such, subject to the inclusion of a condition requiring the ground floor level to be raised, the proposal is considered to be consistent with the objectives of the NPPF and PPG insofar as it relates to flood risk and would comply with Policy SI 12 of the London Plan and Policy E2 of the Royal Greenwich Local Plan.

18. **Legal Agreement**

18.1 Policy IM1 of the Royal Greenwich Local Plan sets out that all qualifying developments will provide for the infrastructure, facilities, amenities and programmes that are considered necessary to support and serve the development and offset any harm.

18.2 The development of this site will require a legal agreement, and the following Heads of Terms have been agreed between the Royal Borough of Greenwich and the applicant:

- Transport
 - £75, 000 contribution towards the implementation of Cycleway 4, which includes the provision of two-way segregated cycle lanes installed on Creek Road, as part of the cycle route connecting Greenwich to Tower Bridge.
 - To provide a Travel Plan for approval prior to occupation, and at years 1, 3 and 5 post occupation, and to pay a monitoring fee for the Travel Plan's review.
 - To enter into a section 278 agreement to carry out works on-site and surrounding highways including agreeing the details of crossovers or street works.

- Education and Employment Training
 - A commitment to utilise GLLaB for the employment of workers during construction as much as is reasonably practical.

- Other Obligations
 - All financial contributions shall be increased by an amount equivalent to the relevant index from the date of the legal agreement until the date that the sum becomes payable.
 - Payment of legal costs
 - Payment of s106 monitoring fees

19. **Public Sector Equality Duty (PSED) and Human Rights**

- 19.1 Under the Equalities Act 2010, the council must have due regard to the need to eliminate discrimination, harassment or victimisation of persons by reason of age, disability, pregnancy, race, religion, sex and sexual orientation. This planning application has been processed and assessed with due regard to the PSED. The application proposals are not considered to conflict with the Duty.
- 19.2 The application has also been considered in the light of the Human Rights Act 1998 and it is considered that the analysis of the issues in this case, as set out in this report and recommendation below, is compatible with the Act.

20. **Conclusion**

- 20.1 The proposed development is considered to be acceptable in principle and would make good use of an existing brownfield site, and would contribute to both the tourism economy and the local economy through the creation of some jobs on-site, and through the indirect benefits of increased visitor accommodation for tourists. In addition, the proposal is considered to have passed the sequential test outlined in the NPPF and is a suitable edge-of-centre location for a hotel.
- 20.2 The proposed amendments to the external façade are considered to be appropriate for the context, providing some level of interest whilst also providing an appropriate buffer between the hotel use and the street. The proposal is considered acceptable in terms of its impact on neighbours, with no significant increase in noise or disturbance likely at nearby residential properties as a result of the proposed use.
- 20.3 As such, based on the above, it is considered that the proposal is acceptable, and is recommended for approval.

Background Papers:

The London Plan (2021),
Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014),
Planning Obligations (s106) Guidance SPD (2015),
The National Planning Policy Framework (NPPF) (2019),
The National Planning Practice Guidance (NPPG),
The Human Rights Act (1998),
The Equalities Act (2010).

Report Author: Andrew Thornley, Senior Planning Officer
Tel No.: 020 8921 5698
Email: Andrew.Thornley@royalgreenwich.gov.uk

Reporting to: Victoria Geoghegan (Assistant Director Planning & Building
Control)
Tel No: 020 8921 4296
Email: Victoria.Geoghegan@royalgreenwich.gov.uk

Appendix I - Drawing numbers

The following drawings have been submitted by the applicant in support of application reference I9/0939/F:

Drawing Nos. CAV-0011 (Rev. C0), CAV-0101-GF (Rev. C0), CAV-0102-01 (Rev. C0), CAV-0103-02 (Rev. C0), CAV-1101-GF (Rev. C12), CAV-1102-01 (Rev. C5), CAV-1103-02 (Rev. C5), 8665-M-0303 (Rev. T1), CAV-0171, CAV-0172, CAV-0173, CAV-0151, 2000 (Rev. P01), 2001 (Rev. P01), 2002 (Rev. P01), 2003 (Rev. P01), 20013-001.

In addition, the following documents have been submitted by the applicant in support of application reference I9/0939/F:

Planning Statement (including Sequential Test), Quality and Environmental Policy (1st February 2020), Plant Noise Impact Assessment (16th March 2020), Technical Advice Note - Addendum to Noise Impact Assessment (24th June 2020), Sustainability Statement (16th March 2020), MY Construction Site Waste Management Plan (1st April 2019), Construction Management Plan, Daikin Installation and Operation Manual - VRV IV+ heat recovery, Servicing Management Plan (February 2020), Cavatina Point Hotel – Above Drainage Calculations (Rev. B) (09.01.20), Flood Risk Assessment and Drainage Strategy (February 2020), Transport Assessment (February 2020), Travel Plan (February 2020), Design and Access Statement (February 2020), Cover Letter (18th March 2020).

Appendix 2 – Conditions and Informatives for Application Reference 20/0951/F:

1. Time Limit

The development to which this permission relates must be begun not later than the expiration of three (3) years beginning with the date on which the permission is granted.

Reason: As required by Section 91 of the Town and Country Planning Act 1990.

2. Approved Drawings

The development shall be carried out strictly in accordance with the application plans, drawings and documents hereby approved and as detailed below:

Drawing Nos. CAV-0011 (Rev. C0), CAV-0101-GF (Rev. C0), CAV-0102-01 (Rev. C0), CAV-0103-02 (Rev. C0), CAV-1101-GF (Rev. C12), CAV-1102-01 (Rev. C5), CAV-1103-02 (Rev. C5), 8665-M-0303 (Rev. T1), CAV-0171, CAV-0172, CAV-0173, CAV-0151, 2000 (Rev. P01), 2001 (Rev. P01), 2002 (Rev. P01), 2003 (Rev. P01).

Planning Statement (including Sequential Test), Quality and Environmental Policy (1st February 2020), Plant Noise Impact Assessment (16th March 2020), Technical Advice Note - Addendum to Noise Impact Assessment (24th June 2020), Sustainability Statement (16th March 2020), MY Construction Site Waste Management Plan (1st April 2019), Construction Management Plan, Daikin Installation and Operation Manual - VRV IV+ heat recovery, Servicing Management Plan (February 2020), Cavatina Point Hotel – Above Drainage Calculations (Rev. B) (09.01.20), Flood Risk Assessment and Drainage Strategy (February 2020), Transport Assessment (February 2020), Travel Plan (February 2020), Design and Access Statement (February 2020), Cover Letter (18th March 2020).

Reason: For the avoidance of doubt and in the interests of proper planning.

3. BREEAM

The new non-residential space shall be registered with Building Research Establishment (BRE), achieve an overall minimum BREEAM Very Good rating (high very good rating <70%) and make reasonable endeavours to achieve

Excellent (based on the latest related BREEAM Technical guidance for Non-Domestic Refurbishment and Fit Out Assessment or subsequent BREEAM version). If it is not possible to achieve the a Very Good rating, this must be demonstrated to the council's satisfaction and shown to be unfeasible.

- a) Interim BREEAM (or subsequent scheme) Assessment, copy of the summary score sheets and related Design Certificates all verified by the BRE shall be submitted to and approved in writing by the Local Planning Authority within three months of the completion of the new non-residential building.
- b) Post Construction BREEAM (or subsequent scheme) Stage Assessment, copy of the summary score sheets and related Certification all verified by the BRE shall be submitted to the Local Planning Authority for written approval confirming the BREEAM standard and measures have been implemented within three months from the date of first use of the new non-residential building.

Following any approval of a 'Post Construction Stage' assessment and certificate of the non-residential building, the approved measures and technologies to achieve the BREEAM (high) Very Good or higher standard shall be retained in working order for the lifetime of the development.

Reason: In the interest of addressing climate change and securing sustainable development in accordance with policies: D3, SI 1, SI 2, SI 3, SI 4, SI 7, SI 12 and SI 13 of the London Plan (2021) and policies DHI and EI of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (July 2014).

4. Water Efficiency

- (a) Prior to the first use of the development hereby approved, water efficiency calculations, prepared by a suitably qualified assessor, shall be submitted to and approved in writing by the local planning authority to demonstrate that the detailed design of the non-residential building is designed to meet BREEAM Excellent standard for the 'Wat 01' BREEAM water category.
- (b) Prior to first use of the hotel, evidence that the approved non-residential spaces have incorporated water saving and monitoring measures that will prevent the undue consumption of water in line with part (a) shall be submitted to the Local Planning Authority for written approval.

Reason: To ensure the sustainable use of water, in accordance with Policy SI 5 of London Plan (2021).

5. Fire Strategy

The development hereby approved shall be carried out in accordance with the details provided in the Concept Fire Strategy Report – Issue 03 (December 2019), and any measures to ensure compliance shall be installed prior to the first use of the building as a hotel, including, but not limited to:

- (a) fire alarm and emergency lighting are to comply with the latest versions of BS5839 and BS5266 (Pt1)
- (b) All final exit doors and doors leading to them are to be easily and immediately operable by persons on their way out without the use of a key at all times the premises are occupied.
- (c) All escape routes are to lead to a place of ultimate safety, be adequately lit and maintained free of obstructions and trip hazards.
- (d) The fire risk assessment is to be reviewed prior, during and upon completion of the works.
- (e) The fire strategy, together with details of the means of escape shall be provided to all guests on arrival.

Reason: In the interests of fire safety and in accordance with Policy D12 of the London Plan (2021).

6. Green Wall

- a) Prior to commencement of the development hereby approved, detailed specifications of the biodiversity green/living walls shall be submitted to and approved in writing by the Local Planning. The biodiversity green/living shall include the following details:
 - i. type of green/living wall which should be of modular natural soil system;
 - ii. biodiversity based with extensive substrate base (depth 80-150mm);
 - iii. an appropriate planting mix to promote biodiversity including but not limited to thymus vulgaris, galanthus nivalis, pachysandra, hebe salicifolia, hyssopus officinalis. Native species shall be prioritised; and
 - iv. an appropriate irrigation system for the green walls;

- v. an appropriate short and long term management and maintenance regime.

- b) Prior to the first use of the development hereby approved, evidence that the green/living walls have been implemented in line with Part A shall be submitted to and approved by the Local Planning Authority.

The approved biodiversity green/living walls shall be permanently retained and maintained thereafter.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity, provide insulation, reduce floor risk and improve the aesthetic value of the development as well as resident's well-being and comply with London Plan (2021) policies G1 (Green Infrastructure), G5 (Urban Greening), S113 (Sustainable Drainage) and G6 (Biodiversity and Access to Nature) and policies OS4 (Biodiversity), DH1 (Design) and E(f) Living Roofs and Walls of the Royal Greenwich Core Strategy and Detailed Policies 2014.

7. Raising of Floor Levels

No bedrooms at ground floor shall be occupied until the finished floor levels for these rooms have been raised to at least 5.68m AOD. Prior to the use of the ground floor bedrooms, an updated 'Proposed Section Plan' showing the revised finished floor levels, and photographic evidence of compliance with the revised section plan, shall be submitted to and approved in writing by the LPA, in conjunction with the Environment Agency.

Reason: To ensure risk to human life is minimised in the event of a flood event, in accordance with Policy SI 12 of the London Plan (2021) and Policy E2 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

8. Amplified Music/Sound

No music, amplified sound system or other form of loud noise (such as singing or chanting) shall be used or generated which is audible outside the premises or within adjoining buildings.

Reason: To safeguard the amenities of the adjoining premises and the area generally and to comply with policies DH(b) and E(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

9. 90 Day Occupation Limit

No part of the hotel hereby approved shall be used as permanent residential accommodation, and guests are not permitted to stay beyond 90 days in a calendar year.

Reason: To enable the Council to have control of any future development on the site as uncontrolled uses could potentially cause harm to the amenity of neighbouring occupiers, users of the hotel, the public highway and local parking provision in accordance with Policy DHI, DH(b), IM(a) and IM(c) of the Royal Greenwich Local Plan (2014).

10. Delivery and Servicing

Deliveries and servicing for the hotel use hereby approved shall be carried out in accordance with the measures set out in the Servicing Management Plan (February 2020).

Reason: To ensure that trips to and from the hotel associated with its operational use are minimised and carefully managed so as not to have a significant adverse impact on the surrounding highway network, in accordance with Policy T7 of the London Plan (2021).

11. Refuse and Recycling

The bin storage areas shown on Drawing No. CAV-1101-GF C 11 (Rev. C12) shall be installed and made available for use prior to the first occupation of any part of the development hereby approved, and the approved layout shall be permanently retained thereafter. In addition, refuse collection shall be carried out in accordance with the details set out in Servicing Management Plan (February 2020).

Reason: To ensure that adequate arrangements are made for the storage and collection of refuse and recycling materials from all parts of this development in a manner that does not adversely affect the amenities of adjoining properties, in accordance with Policies SI 7 of the London Plan (2021) and Policy DHI of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

12. Cycle Parking

The cycle storage areas shown on Drawing No. CAV-1101-GF C 11 (Rev. C12), including a minimum of 2 short-stay spaces and 6 long-stay spaces, shall be

installed and made available for use prior to the first occupation of any part of the development hereby approved, and the approved layout shall be permanently retained thereafter. Cycle spaces shall be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and shall cater for larger cycles, including adapted cycles for disabled people.

Reason: To ensure that adequate arrangements are made for cycle parking in accordance with Policy T5 of the London Plan (2021).

13. Noise Mitigation

Prior to the first use of the hotel, the rooftop mechanical plant will be installed within compounds having minimum 3m high sides of imperforate construction, minimum 8kg/m² superficial density and plant items will be installed not more than 2m from the sides of the compound to maximise acoustic screening effects in accordance with the Technical Advice Note - Addendum to Noise Impact Assessment (dated 24th June 2020). In addition, vibration mounts will be installed as outlined in Sections 8.4.7 and 8.4.8 of the Noise Impact Assessment (dated 16th March 2020).

Reason: To ensure the proposal does not cause significant harm to nearby residential properties or residential amenity areas in accordance with Policies D13 and D14 of the London Plan (2021) and Policy E(a) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014).

Informatives

1. The applicant is advised of the need to install measures which ensures that the property is compliant with part B5 of the Building Regulations Fire Safety: Approved Document B. These measures should be permanently retained as installed, unless otherwise directed in writing by the London Fire Brigade.
2. Site construction works shall only be carried out between the hours of 08:00 and 18:00 Monday to Friday, 08:00 and 13:00 on Saturday and not at all on Sundays and Bank Holidays.

Appendix 3 – National, regional and local planning policies and Supplementary Planning Guidance / Documents.

I. The London Plan (2021) – The following London Plan policies are of consideration:

Chapter 1: Planning London’s Future – Good growth

- GG2 Making the best use of land
- GG5 Growing a good economy

Chapter 2: Spatial Development Patterns

- SD6 Town centres and high streets
- SD7 Town centres: Development proposals and Development Plan Documents

Chapter 3: Design

- D3 Optimising site capacity through the design-led approach
- D11 Safety, security and resilience to emergency
- D12 Fire safety
- D13 Agent of Change
- D14 Noise

Chapter 6: Economy

- E9 Retail, markets and hot food takeaways
- E10 Visitor infrastructure

Chapter 8: Green Infrastructure and Natural Environment

- G5 Urban Greening
- G6 Biodiversity and access to nature

Chapter 9: Sustainable Infrastructure

- SI 2 Minimising greenhouse gas emissions
- SI 5 Water infrastructure
- SI 7 Reducing waste and the circular economy
- SI 12 Flood risk management

Chapter 10: Transport

- T1 Strategic approach to transport
- T2 Healthy Streets
- T3 Transport capacity, connectivity and safeguarding
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking
- T6.4 Hotel and leisure use parking
- T7 Deliveries, servicing and construction

2. **The Royal Greenwich Local Plan: Core Strategy with Detailed Policies (“Core Strategy” – 2014)** – The main Core Strategy policies relevant to this application are:

Economic Activity and Employment Policies

- EA5 Tourism
- EA(a) Local Employment Sites

Design and Heritage Policies

- DH1 Design
- DH(b) Protection of Amenity for Adjacent Occupiers

Environment and Climate Change Policies

- E1 Carbon Emissions
- E2 Flood Risk
- E3 Residual Flood Risk
- E(a) Pollution
- E(f) Living Roofs and Walls

Cohesive and Healthy Communities Policies

- CHI Cohesive Communities

Infrastructure and Movement Policies

- IM1 Infrastructure
- IM4 Sustainable Travel
- IM(a) Impact on the Road Network

IM(b) Walking and Cycling
IM(c) Parking Standards

3. Supplementary Planning Guidance / Documents – the following planning guidance / documents are considered relevant:

- Planning Obligations (s106) Guidance SPD (2015)