

Planning Board	Agenda Item: 9
17 March 2020	Reference No: 19/0939/F

Applicant: Travelodge/O'Keefe Group
Agent: Charlotte Grant, MDA Planning

Site Address: 1 Boord Street, Greenwich, London, SE10 0PU	Ward: Peninsula Application Type: Full Planning Permission
--	--

I. Recommendation

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

- Construction of a building of up to 18-storeys (plus basement level and rooftop plan enclosure), to provide a 300 bed hotel with ancillary A1/A2/A3/B1/D2 provision, associated access, car and cycle parking, servicing and delivery areas, following the demolition of existing buildings.

Subject to:

Referral of the application to the Mayor of London as required under the terms of the Town and Country Planning (Mayor of London) Order 2008.

I.2 To resolve to grant conditional planning permission subject to 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 (Section 25), its addendums, and according to the conditions (Appendix 2) to be detailed in the notice of determination.

I.3 To authorise the Assistant Director of Planning & Building Control to:

- make any minor changes to the detailed wording of the recommended conditions as set out in this report and its addendums, where the Assistant Director of Planning & Building Control considers it appropriate, before issuing the decision notice; and
- 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 (Section 25) and its addendums.

- 1.4 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:
- (i) In the absence of a legal agreement to secure a connection to the nearby district heating network, the proposal would fail to achieve sufficient carbon dioxide reductions, and would therefore be contrary to Policies 5.2 and 5.3 of the London Plan and Policy E1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies.
 - (ii) In the absence of a legal agreement to secure street-level upgrades and improvements to the public realm, the proposal would fail to improve the pedestrian environment and appearance of the local streetscene, thereby failing to encourage active modes of transport, contrary to Policies 7.2, 7.4 and 7.5 of the London Plan and Policy DHI of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies.
 - (iii) In the absence of a legal agreement to protect the delivery of the Silvertown Tunnel DCO, the proposal would potentially prejudice a nationally significant infrastructure project, and would therefore be contrary to Policies 6.1, 6.4, 6.11 and 6.12 of the London Plan and Policy IM3 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies.
 - (iv) In the absence of a legal agreement to secure contributions for employment, skills and training, the proposal would fail to provide training and skills opportunities for local people, and would therefore be contrary to Policy EA(c) of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies.

2. Executive Summary

- 2.1 Officers have considered the application against the relevant development plan policies contained within the London Plan (2016) and the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014). In addition, the National Planning Policy Framework (NPPF) (2019), the draft London Plan (2019), and Planning Practice Guidance are of relevance.
- 2.2 This application follows a previously refused application for a hotel of a similar height and scale, which was refused by Planning Board under application reference 18/0452/F on the 4th December 2018, with one reason for refusal:

The development by reason of its poor quality design fails to incorporate the highest standards of architecture required to justify a tall building in this prominent location and to ensure development makes a positive relationship between the proposed and existing urban context contrary to policy DH1 of the Core Strategy 2014 and policies 7.4, 7.6 and 7.7 of the London Plan 2016.

- 2.3 The proposal is considered to be acceptable in principle, and would make efficient use of a brownfield site in an urban location, contributing to the borough’s visitor infrastructure, thereby supporting the function of the O2 and the Maritime Greenwich World Heritage Site.
- 2.4 The proposed hotel would have a bold and distinctive appearance which would foster a positive relationship with its surroundings, having regard to the outline consent for the Peninsula Masterplan which sets maximum building heights similar to that proposed here. In addition, the proposed design of the hotel, in terms of its form and materiality, has been significantly altered from the previous application, and now has a very contemporary appearance which creates a clear sense of identity. In this regard, it is considered that the proposal has overcome the previous reason for refusal.
- 2.5 Owing to its siting well away from existing residential properties, and its siting approximately 120 metres away from planned residential developments, it is considered that the proposal would not have a significant adverse impact on neighbouring amenity. Whilst conferred less protection than residential properties, it is further considered that the proposal would have no significant adverse impact on the surrounding commercial and business units.
- 2.6 Subject to the imposition of conditions controlling construction processes, and a travel plan once operational, it is considered that there would be no significant impacts on the local highway network as a result of the proposed development. Moreover, subject to an Asset Protection Agreement between Transport for London and the applicants, the proposal would not prejudice the delivery of the Silvertown Tunnel DCO.
- 2.7 The scheme is liable to pay towards the council’s CIL and the Mayor’s CIL.
- 2.8 Detailed below is a summary of the application:

The Site -	
Site Area	2100 m ²
Local Plan Allocation	No
Heritage Assets	None
Tree Preservation Order	None
Flood Risk Zone	Flood Zone 3 (benefits from flood defences)

Proposed Building	
Building height	75.6 metres
No. of storeys	18
Floor area	13, 083 m ²

Non-Residential Uses		
Existing Use(s)	Existing use (Classes) / Operator	BI(a) (Office)
	m ²	857 m ²
Proposed Use(s)	Proposed use(s) (Classes) / Operator	CI (Hotel)
	m ²	12, 946 m ²
Proposed Use(s)	Proposed use(s) (Classes) / Operator	Flexible A1-A3, BI(a) or D2
	m ²	137 m ²
Employment	Existing Number of Jobs	40 full-time
	Predicted proposed number of jobs	20 full-time 40 part-time

Transportation		
Car Parking	No. existing car parking spaces	60
	No. Proposed Car Parking Spaces	60
	Proposed Parking Ratio	1 space for every 5 rooms
Cycle Parking	No. Proposed Cycle Parking	22 long-stay 12 short-stay
	Complies with policy	Yes
Public Transport	PTAL Rating	2

Sustainability / Energy	
BREEAM Rating Predicted	Excellent
Reduction in CO2 Emissions	221 tonnes/year
Renewable Energy Source Predicted Reductions (%)	42%

Public Consultation	
Number in Support	0
Number of Objections	3 (2 from neighbour notification and 1 from the PLA)
Main Issues Raised (addressed in Section 8)	Existing noise levels are high and issues with construction.

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

3. Site Location Plan



4. Site and Surroundings

- 4.1 The application site comprises a large area of hardstanding with a two-storey, red-brick building with a dual-pitched roof, sited in the south-west corner. The site is bordered on all sides by a 2.0 metre tall palisade fence, with access to the site achieved from Boord Street to the north.
- 4.2 The immediate context of the site has a largely industrial appearance, with a recycling plant located opposite, a Thames Water pumping station and the estate services centre for the Peninsula Knight Dragon developments to the east, and the Horniman Museum storage building to the south. The Blackwall Tunnel Southern Approach (A102) is adjacent to the site to the west, with industrial land further to the west, although there are development proposals which would result in this area being brought forward for residential-led uses.
- 4.3 The wider context for the site is in a period of transition, with the outline consent approved under application reference 15/0716/O setting out maximum building heights for various parcels of land across the peninsula, which are currently undeveloped or in use as car parks. This outline consent has not been fully implemented, but maximum heights for the plots closest to

the site are set at 75 metres (plots 17.01, 17.02, 22.01, and 22.02) and 35 metres (Plots 15 and 21).

5. **Site Specific Local Plan Designations**

- Flood Risk Area (Zone 3)
- Strategic Development Location

6. **Relevant Planning History**

- **18/0452/F** – The demolition of existing buildings and the construction of a building up to 18-storeys, to provide a 300 bed hotel with ancillary A1/A2/A3/B1/D2 provision, associated access, car and cycle parking, servicing and delivery areas was refused on the 4th December 2018. The reason for refusal stated:

The development by reason of its poor quality design fails to incorporate the highest standards of architecture required to justify a tall building in this prominent location and to ensure development makes a positive relationship between the proposed and existing urban context contrary to policy DH1 of the Core Strategy 2014 and policies 7.4, 7.6 and 7.7 of the London Plan 2016.

7. **Proposed Development**

- 7.1 The proposal seeks permission for demolition of the existing building and the erection of a part 6 (45 metres), part 9 (31 metres), part 18 (76 metres) storey hotel, sited to the east of the A102 and to the south of Boord Street. The variation in heights would result in the tallest element sited adjacent to the A102, the second tallest element sited adjacent to the Thames Water pumping site to the east and the shortest element site centrally between them.
- 7.2 The proposed hotel would utilise a combination of curved roof forms, which narrow to points facing east, west and north, with flat roofed elements facing south, whilst the main body of the building would have a rectilinear appearance. The façade will predominantly comprise of copper cladding, with the south-west corner including a green wall. The base of the hotel, facing north towards Boord Street would include higher levels of glazing than the middle and upper floors, which broadly correlates with the location of the hotel rooms internally.

- 7.3 Sixty (60) car parking spaces are proposed, with twenty-eight (28) spaces provided at first and second floor levels, accessed by way of a car lift, and four (4) wheelchair accessible spaces located at ground floor level. In addition, 22 long-stay and 12 short-stay cycle spaces are proposed.
- 7.4 The ground floor of the proposed hotel would largely be made up of hardstanding, to allow vehicles to enter and exit the site from different locations on Boord Street. In addition, the ground floor would include a retail unit with a floor area of 137 sqm, the hotel lobby, plant, bin store and cycle storage area.

8. Consultation

- 8.1 Nine (9) local properties were notified by way of letter dated the 15th April 2019, a site notice was displayed outside the application site in April 2019 and a press notice was displayed in the Greenwich Weekender on the 24th April 2019.
- 8.2 Following the receipt of amended drawings, local properties were re-notified on the 14th January 2020 and a site notice was displayed outside the site on the 15th January 2020.
- 8.3 In addition, consultation with statutory bodies and local amenity groups was carried out and their comments are summarised below.
- 8.4 In addition, and in accordance with the Town and Country Planning (Mayor of London) Order 2008, this application has been referred to the Greater London Authority (GLA) for their comments on this application. The GLA have provided stage 1 comments on this application, and their response is summarised below. It is important to note that this application is subject to a second referral to the Mayor once a decision has been reached by Planning Board, as set out in section 1.

Statutory Consultees

- 8.5 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 conditions requiring	The suggested conditions have all been included in appendix 2.

	<p>finished floor levels to be no higher than 4.72m AOD, flood risk management measures to be incorporated, piling to be conducted in accordance with the Local Planning Authority, and unexpected contamination to be reported.</p>	
<p>Greater London Authority (GLA)</p>	<p>No objection in principle, subject to a condition confirming that the hotel cannot be occupied until the hazardous consent order for the nearby redundant gasholder has been formally revoked.</p> <p>The proposed design has been drastically altered from the previous proposal and now introduces curvilinear and angled geometry which results in a more distinctive silhouette. The height, scale and form are supported, however the use of a grey coloured palette could appear incongruous and a reined material palette could be explored.</p> <p>The application is not compliant with Policy SI2 of the draft London Plan, and revisions to the energy strategy, including exploring options to connect to the nearby</p>	<p>The principle of development is considered acceptable, and this view is consistent with the view taken in the assessment of application reference 18/0452/F.</p> <p>The design has been through several iterations, and is considered to be acceptable. It is recognised that the design would be unique, having a very distinctive appearance using contemporary materials, however this is considered to be acceptable, creating its own context in a generally industrial setting.</p> <p>An amended Energy Strategy has been submitted to address the concerns raised by the council's and the GLA's Energy Officer, and this will be addressed in the GLA's stage 2 comments.</p> <p>To overcome any potential conflict with elements of the Silvertown Tunnel DCO, the applicant will enter into an</p>

	<p>district heating network.</p> <p>The applicant is required to address potential conflicts with the implementation of the Silvertown Tunnel DCO, specifically relating to the replacement footbridge over the A102. Pedestrian realm and cycle improvements should be secured through a s106 agreement. Car parking spaces should be reduced and the approach to the cycle parking revised.</p>	<p>Asset Protection Agreement with TfL, and this will be secured through a planning obligation within an s106 agreement.</p>
Historic England	<p>Historic England have no comments to make.</p>	<p>No comment.</p>
Historic England: Greater London Archaeological Advisory Service	<p>No objection, subject to a condition requiring the submission of a written scheme of investigation, with post-investigation assessment.</p>	<p>The suggested condition has been included within appendix 2.</p>
Health and Safety Executive (HSE)	<p>No comments received.</p>	<p>No comments were received from the HSE for this application, however site circumstances have not changed significantly since the previous application was submitted, and it is therefore considered that their previous comments remain relevant.</p> <p>A condition has therefore been included which requires the gas holder site to be completely revoked before the hotel can be occupied.</p> <p>In addition, a hazardous</p>

		consents order exists for the Brenntag site to the north-west of the site. The proposed hotel would be located a safe distance away from this site.
London City Airport	No objection from an aerodrome safeguarding perspective.	No comment.
London Fire Brigade	No objection, subject to an informative requiring compliance with part B5 of Approved Document B of the Building Regulations.	The suggested informative has been included within appendix 2.
Metropolitan Police Service	No objection, subject to a condition ensuring compliance with 'Designing out Crime' standards.	The suggested condition has been included within appendix 2.
Port of London Authority (PLA)	Raises an objection on the grounds that insufficient consideration has been given to the impact of the existing safeguarded wharves on the proposed hotel use.	This objection is noted, and is discussed in greater detail in section 17 of this report.
Thames Water	There will be sufficient capacity in our sewerage network to accept the surface water discharge rate provided.	No comment.
Transport for London (TfL)	No objection, subject to the inclusion of conditions requiring the submission of a Travel Plan, a Construction Logistics Plan, a Delivery and Servicing Plan as well as conditions ensuring compliance with cycle parking standards.	The suggested conditions have been included within appendix 2.

	Separately, TfL require the applicants to enter into an Asset Protection Agreement, and this requirement should be enshrined within a s106 agreement.	
--	---	--

8.6 Council Departments

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
Pollution Control - Contaminated Land	There are several potential sources (on-site and off-site) of significant ground contamination in and around the site. As such, further intrusive investigation is required, and this should be secured through a planning condition.	The suggested condition has been included within appendix 2. In addition, a condition requiring the redundant gasholder to the north of the site to be fully decommissioned before the hotel is occupied has also been included.
Pollution Control - Noise and Air	No objection, based on the information contained within the Air Quality Assessment and the external building Fabric Assessment, which includes mitigation measures to create an appropriate acoustic environment. A condition to control dust and noise during construction should also be included.	The suggested condition has been included within appendix 2.
Building Control	No objection.	No comment.

<p>Sustainability and Renewal</p>	<p>No objection in principle as the proposed development would connect to the nearby district heating network.</p> <p>A carbon offsetting payment is required to compensate for any shortfall in carbon dioxide reductions.</p>	<p>Compliance with their energy strategy shall be secured by condition and the suggested carbon offsetting payment will be included as a planning obligation in the s106 agreement.</p> <p>This is discussed in greater detail in section 20 of this report.</p>
<p>Transport and Highways</p>	<p>The application site is located approximately 800 metres south of North Greenwich Station and has three bus routes within walking distance. However, the site has poor access to public transport generally and this is reflected in the poor PTAL of 2.</p> <p>60 car parking spaces for guests are proposed; 30 each at first and second floor level, accessed from a car lift.</p> <p>This level of provision is considered to be acceptable, as is the provision of electric vehicle charging points for 20% of the spaces and the number of wheelchair accessible spaces.</p> <p>Subject to the inclusion of a condition controlling construction impacts, the submission of a travel</p>	<p>Impacts on the local highway network and parking provision are discussed at section 13 of this report.</p> <p>The suggested conditions have been included within appendix 2.</p>

	plan, and a delivery and servicing plan, the proposal is considered acceptable.	
Waste Services	No objection.	Refuse and recycling facilities are discussed in section 19 of this report.

8.7 Amenity Groups

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
East Greenwich Residents Association	Did not respond.	No comment.
The Greenwich Society	Objects on the basis that the proposal conflicts with the Peninsula West Masterplan SPD, the GP3 design brief, and would be of an inappropriate height and appearance.	The principle of development is discussed in section 11 of this report, and specifically, the policy context of the proposal in relation to the Peninsula West Masterplan SPD and the GP3 design brief are discussed in section 11. Design and appearance are discussed at section 12 of this report.

8.8 Local Residents and Businesses

Objections were received from two 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
Existing noise sources in the area could cause a nuisance for future users of the hotel.	The proposed use is considered to be appropriate in its context, and subject to appropriate mitigation, future guests of the hotel would be provided with an

	acceptable acoustic environment. This is discussed in greater detail at section 17 of this report.
Potential impacts on the storage of artefacts within the Dreadnought building to the south.	Impacts of construction will be controlled through a condition requiring the applicants to submit a construction management plan.

9 **Planning Context**

9.8 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.

9.9 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 (2016)
- Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014)

9.10 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)
- Greenwich West Masterplan SPD (2012)

9.11 Also material considerations in determining planning applications are:

- The National Planning Policy Framework (NPPF) (2019)
- The National Planning Practice Guidance (NPPG)
- The Draft London Plan (intent to publish March 2020)
- Greenwich Peninsula Site GP3 Planning Brief (2017)
- The Human Rights Act (1998)
- The Equalities Act (2010)

9.12 Regard is had to the Draft London Plan, which has completed the Examination in Public and has now reached an advanced stage in the adoption process. As such the Draft London Plan is a material consideration in the determination of planning applications and decision makers can now attach

more weight to its polices. The draft London Plan however does not hold full weight until formally adopted and until this time applications will continue to be determined in accordance with the current Local Plan and polices.

10 Material Planning Considerations

10.8 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;
- Design Quality
 - Height, Massing and Scale
 - Detailed Design and Materials
 - Public Realm
- Transport and Access;
 - Parking Provision
 - Impact on the Silvertown Tunnel DCO
- Biodiversity, Trees and Landscaping
- Security and Community Safety
- Impact on Existing Residential Amenity
- Noise and Air Pollution;
- Wind and Microclimate
- Waste and Refuse Provision;
- Sustainability and Energy;
- Flood Risk;
- Archaeology
- Aviation
- Hazardous Substances
- Legal Agreement; and
- Public Sector Equality Duty (PSED) and Human Rights

11 Principle of Development

11.8 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.

- 11.9 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.
- 11.10 Policy 4.5 of the London Plan requires local authorities to support London's visitor economy and stimulate its growth, and London Boroughs should seek to improve the range and quality of provision, especially in outer London. As such, a target of 40,000 net additional bedrooms should be provided by 2036, of which at least 10% should be wheelchair accessible. Policy 4.6 further sets out that new visitor accommodation should be created in appropriate locations, with a focus on town centres, opportunity and intensification areas and areas of good public transport access.
- 11.11 Alternatively, visitor infrastructure should be located in areas which would promote, enhance and protect the special characteristics of major clusters of visitor attractions including those identified in Strategic Cultural Areas or should support the provision of business visitors, including high quality, large-scale convention facilities.
- 11.12 As set out above, application reference 18/0452/F, which sought to erect a hotel of a similar height and scale to that currently proposed, was refused
- 11.13 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.
- 11.14 In addition, Policy 4.2 of the London Plan requires boroughs to support the management and redevelopment of offices, whilst Policy EA(a) of the Royal Greenwich Local Plan seeks to maximise the contribution to employment from existing sites.
- 11.15 The proposed development would introduce a 300-bedroom hotel onto a site currently in use as an office. The loss of the office is considered acceptable, on the basis that the proposed use would likely create a similar level of employment whilst making more efficient use of a brownfield site.

- 11.16 Moreover, the general thrust of Policy 4.5 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, such as the O2 and historic Greenwich. 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 both of these attractions.
- 11.17 Also of relevance are Policy EA3 of the Royal Greenwich Local Plan, the Peninsula West Masterplan SPD and the Greenwich Peninsula Site Brief GP3. Policy EA3, together with the Peninsula West Masterplan SPD, set out development proposals for the land between Millennium Way and the A102 including the redundant gasholder and the application site, as well as the land between the A102 and the River Thames.
- 11.18 The Peninsula West Masterplan sets out that the area between Millennium Way and the A102 could accommodate a university sports facility (associated with university buildings proposed to be brought forward on the west side of the A102), to include a mixture of outdoor sports facilities, auxiliary pavilions and large indoor sports facilities, which would serve the community as well.
- 11.19 However, the Greenwich Peninsula Site GP3 Planning Brief, which relates only to the land between Millennium Way and the A102 north of Old School Close, provides an updated plan for this area, and is a material consideration in the determination of all planning applications which fall within its boundaries. Whilst not an adopted SPD, it is considered that the GP3 Planning Brief largely supersedes the Peninsula West Masterplan, as it better reflects the changing circumstances of the area and provides a better framework for realising the future potential of sites within its boundaries.
- 11.20 The GP3 Planning Brief recognises that the land between Millennium Way and the A102 would be better suited to residential and commercial-led developments, and largely owing to noise constraints, recommends that residential uses are positioned away from the A102. It further recommends that less sensitive uses, such as commercial and leisure uses, are positioned closer to the A102, providing a buffer from the proposed residential uses to the east. The GP3 Planning brief further recommends that appropriate land uses for the area could include offices, hotels, data centres or storage centres.
- 11.21 Consequently, whilst it is recognised that the proposal would conflict with Policy EA3 and the Greenwich West Masterplan SPD, the updated plan for the area, as described in the GP3 Planning Brief, sets out that the site is

suitable for a commercial-led development, including potentially a hotel, and on this basis, the proposal is further considered acceptable in land-use terms.

12 Design Quality

- 12.1 Policy 7.4 of the London Plan states that new development should have regard to the pattern and grain of existing spaces in orientation, scale, proportion and mass and should contribute to a positive relationship between the built form and the natural features of a site. Policy 7.5 of the London Plan sets out that development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help people find their way. Landscape treatment, street furniture and infrastructure should be of the highest quality, have a clear purpose, maintain uncluttered spaces and should contribute to the easy movement of people through the space.
- 12.2 Furthermore, Policy 7.6 of the London Plan states that new buildings should be of a high architectural quality, be of a proportion, composition, scale and orientation that enhances the public realm, and should include details that complement the local architectural palette. Policy 7.7 of the London Plan states that tall buildings should generally be limited to town centres or areas whose character would not be adversely affected by the scale, mass or bulk of a tall building. In addition, tall buildings should improve the legibility of an area by emphasising a point of civic or visual significance, enhance the skyline, have ground floor activities that promote a positive relationship with surrounding streets and contribute to the permeability of the site and wider area.
- 12.3 Policy DH1 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.
- 12.4 In addition, Policy DH2 of the Royal Greenwich Local Plan identifies locations which may be suitable for tall buildings, which includes Greenwich Peninsula and Greenwich Peninsula West. The supporting text to Policy DH2 explains that well-designed tall buildings can potentially create landmarks for an area

and the intensification of use that they provide can also act as a catalyst for regeneration.

- 12.5 As set out above, application reference 18/0452/F, which sought to erect a hotel of a similar height and scale to that currently proposed, was refused with one reason for refusal, which stated:

The development by reason of its poor quality design fails to incorporate the highest standards of architecture required to justify a tall building in this prominent location and to ensure development makes a positive relationship between the proposed and existing urban context contrary to policy DH1 of the Core Strategy 2014 and policies 7.4, 7.6 and 7.7 of the London Plan 2016.

- 12.6 As such, regard is had to the previous reason for refusal and the amendments to the proposal which have been sought to overcome this.

Height, Massing and Scale

- 12.7 The proposed hotel would be 18 storeys high, plus a basement level and a rooftop enclosure for plant, although this rooftop enclosure would be largely hidden as a result of the proposed roof form. The apex of the largest element would be 76 metres above ground floor level, with the two smaller towers topping out at 45 metres and 31 metres.
- 12.8 The GP3 Planning Brief sets out that the mix of building forms, and buildings between Millennium Way and the A102 should break up massing, to avoid the creation of large or overbearing single volumes and ensure a varied and visually interesting roofscape. The scale and massing of development should consider effects on surrounding development, specifically overshadowing of public spaces, sunlight and daylight impacts, wind micro-climate and residential amenity. Figure 4.4 of the GP3 Planning Brief illustrates that this part of the GP3 area should have lower to medium scale buildings, with greater building heights subject to further townscape analysis.
- 12.9 Also of relevance is the outline consent approved under application reference 15/0716/O which sets out maximum building heights for various parcels of land across the peninsula, which are currently undeveloped or in use as car parks. This outline consent has not been fully implemented, but maximum heights for the plots closest to the site are set at 75 metres (plots 17.01, 17.02, 22.01, and 22.02 – approximately 120 metres from the site) and 35 metres (Plots 15 and 21 – approximately 100 metres from the site).

- 12.10 On this basis, it is considered that the height of the proposed hotel would be appropriate for the area, reflecting planned heights in relatively close proximity to the site. In addition, the proposal includes varying heights, with an unusual and highly distinctive roof form which gives the hotel a sleek appearance, and the perception of a slimmer profile.
- 12.11 This is demonstrated in the Townscape and Visual Impact Assessment (TVIA) submitted with the application, which provides a contextual analysis of the proposal, both individually and cumulatively with planned developments across the peninsula, including that indicatively approved under application reference 15/0716/O. The TVIA shows the proposal as being visible amongst the skyline when viewing the site from the west, particularly from the riverfront to the north of the world heritage site, and to a lesser extent from the General Wolfe Statue within Greenwich Park, but in the context of planned development for the wider area, would be in keeping with the general pattern of heights.
- 12.12 It is further recognised that the redevelopment of the site presents an opportunity to provide a landmark building for the site, with its unique roof form, profile and materiality, and in some capacity would assist wayfinding by creating a distinctive building adjacent to a main arterial road through the borough.
- 12.13 It should be noted that the previously refused application has a maximum height of 64 metres, approximately 10 metres lower than the current scheme, although the hierarchy of heights follows a broadly similar pattern. No objection to the previous height was raised, as the reason for refusal related primarily to the detailed design and general massing, which was considered to be unacceptable. The recorded minutes for Planning Board set out that the previous design did not reflect the prominent position of the building, and did not take advantage of an opportunity to create a landmark building. The previous and current proposals are shown below, with the refused proposal shown on the left and the current proposal shown on the right.



12.14 The current proposal, being approximately 20 metres taller than that previously proposed, reflects the change in approach, moving away from a simple and robust design with extensive use of brick, towards a visually striking “landmark” building, which makes use of extensive copper to add visual interest. In this regard, it is considered that the additional height is appropriate as it helps to create a more sleek profile with a distinctive roof form.

12.15 On the basis of the above, it is considered that the proposal would be of an appropriate height and scale, consistent with policies 7.4, 7.5, 7.6 and 7.7 of the London Plan and policies DH1 and DH2 of the Royal Greenwich Local Plan. Whilst some conflict with the GP3 Planning brief has been identified, it is considered that sufficient justification for the proposal in terms of its height and scale have been provided, as demonstrated in the TVIA, and the proposed scale is therefore considered acceptable.

Detailed Design and Materials

12.16 As set out above, the proposed hotel would have a unique and distinctive appearance, with curved roof features above a linear building form, with varying heights across the site of 76 metres, 45 metres and 31 metres. The proposed materials have been amended during the course of the application, originally proposed with reflective panelling, but now with extensive use of copper panels across the façade. The base of the hotel, facing northwards

towards Boord Street, would primarily consist of glazing with contemporary-style columns providing visual relief, and this can be seen in the image below.



12.17 The proposed design, including the extensive use of copper across the façade, is considered appropriate, and would reinforce the proposed building's position as visual marker for the area, thereby assisting legibility. Whilst the built form in the locality makes use of high levels of brick and the proposed hotel would not replicate this, it is recognised that the context of the site is largely industrial in appearance, and the proposal therefore has an opportunity to create its own context with a high quality design.

12.18 Moreover, it is recognised that the 'Optic Cloak', which masks the chimney stacks for the district energy centre approximately 120 metres to the south of the application site, provides some precedent for contemporary, modern finishes. This is of particular relevance given the positioning of the A102, which runs past both sites, and the two buildings would provide a backdrop for each other in this context, helping to integrate the proposal with its surrounds.

- 12.19 Regard is also had to the previous application, which cited a poor and uninspiring design in a prominent location as its sole reason for refusal, with an intention to create a “landmark” building in this location. As set out above, the proposal now has a taller, slimmer appearance with a very distinctive roof form and widespread use of contemporary materials (copper). This change in approach is welcomed in this instance, and having regard to the surrounding buildings, would create a tower with a very unique appearance which would create its own identity.
- 12.20 As such, it is considered that the overall design rationale for the proposal, including the proposed materials, is acceptable, and the proposal would comply with policies 7.4, 7.5, 7.6 and 7.7 of the London Plan and policies DH1 and DH2 of the Royal Greenwich Local Plan, which seek to encourage a high quality of design. In this regard, it is considered that the proposal overcomes the previous reason for refusal.

Public Realm

- 12.21 The proposed hotel would be sited in close proximity to a new footbridge across the A102, which would be constructed to replace the existing footbridge approximately 20 metres north of the site. The exact design and position of this replacement footbridge is yet to be determined, and will be decided upon as part of the ongoing discharge of conditions for the Silvertown Tunnel Development Consent Order (DCO).
- 12.22 Notwithstanding that the design and positioning of the replacement footbridge have not yet been agreed, an indicative position was provided for the purposes of completing the DCO, and it is important to consider the impact of the proposal on the delivery of the footbridge, which will be discussed in greater detail below.
- 12.23 Separately, but linked to the delivery of the replacement footbridge, it is proposed that Boord Street be upgraded to either a ‘shared surface’ or a ‘pedestrian-priority surface’, which would overhaul the existing layout of Boord Street. The replacement footbridge and the upgrades to Boord Street form an integral part of planned improvements across the peninsula, and wider area, with Boord Street forming part of the Thames Path route, which cuts across the peninsula rather than following the riverbank.
- 12.24 Consequently, financial contributions have been agreed towards funding public realm improvements on Boord Street, linked to pedestrianisation of this road, and to fund the creation of a dedicated controlled crossing slightly to the north of the junction between Boord Street and Millennium Way, and

rectifying the poor public realm (including the small layby) between the junction and the proposed crossing site. An uncontrolled crossing already exists, which includes a relatively long central island, creating a staggered route across Millennium Way, which is not desirable.

- 12.25 It is considered that the future relocation of the footbridge over the Blackwall Tunnel Approach, combined with the Boord Street upgrades and the dedicated controlled crossing will create a safe, convenient, and fully accessible pedestrian route across this part of the peninsula (crossing two of the three major roads on the peninsula), encouraging walking and cycling and reducing reliance on the private car.

13 Transport and Access

Parking Provision

- 13.1 Policy 6.13 of the London Plan sets out that the Mayor wishes to seek an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use. To achieve this, maximum car parking standards are set out in Table 6.2 of the London Plan should not be exceeded, except in areas with very poor access to public transport. In addition, Policies 6.9 and 6.10 of the London Plan seek to ensure that developments encourage cycling and walking over other less sustainable modes of transport.
- 13.2 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.
- 13.3 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.
- 13.4 The proposal includes the provision of 60 car parking spaces for guests, 3 operational vehicle spaces, 22 long-stay cycle spaces and 12 short-stay cycle spaces.

- 13.5 There are no set minimum or maximum parking standards for hotel uses within the London Plan or the Royal Greenwich Local Plan, and each case must be assessed on a case by case basis, although there is a general presumption that parking spaces for private vehicles should be reduced as much as possible.
- 13.6 The application site has a PTAL of 2, on a scale of 0 (worst) to 6b (best), which is reflective of a relatively poor level of access to public transport. Whilst it is recognised that the wider area will likely see transport infrastructure improvements in the coming years, including the creation of a bus interchange at North Greenwich Station, the TfL WebCAT tool does not identify any significant improvements to the PTAL in the immediate vicinity of the application site, and on this basis, the provision of 60 car parking spaces for guests is considered acceptable. This has been confirmed by TfL and the councils Highways officer in their comments on the proposal.
- 13.7 In addition, the provision of 22 long-stay and 12 short-stay cycle spaces is considered to reflect an appropriate demand for a hotel use in this location, and would encourage the uptake of cycling for future users. Concern has been raised by TfL that the space dedicated to the long-stay cycle spaces is not large enough and the positioning of the short-stay cycle spaces are too far from the entrance of the hotel and adjacent commercial unit.
- 13.8 Consequently, the 12 short-stay spaces would be located to the front of the commercial unit, on the footway. This is considered to be an appropriate location, providing convenient cycle spaces for users of both the hotel and the commercial unit, whilst ensuring there are high levels of passive surveillance for these spaces. The internal layout of the long-stay cycle spaces is also considered to be acceptable, and the provision of these spaces will be secured by way of a condition.

Impact on the Silvertown Tunnel DCO

- 13.9 The siting of the proposed hotel has the potential to conflict with the siting of the proposed replacement footbridge over the A102, and concerns have been raised by TfL in this regard. The Silvertown Tunnel DCO is a Nationally Significant Infrastructure Project and prejudicing the ability for the Silvertown Tunnel to be implemented is therefore a material consideration.
- 13.10 Ongoing discussions between the council, TfL and the applicants have resulted in a revised layout to the ground floor, so as to minimise any potential conflicts which may arise both during construction and once the hotel is operational. Subject to the applicants entering into an Asset

Protection Agreement (APA0 with TfL to ensure that any impacts of development are mitigated, there is considered to be no impact on the ability for the Silvertown Tunnel to be implemented.

I4 Biodiversity, Trees and Landscaping

- I4.1 Policy 7.19 of the London Plan sets out that development should, wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity. To achieve this, proposals should plan for nature from the beginning of the development process, and all development should seek to take opportunities for positive ecological gains for nature through their layout, design and materials.
- I4.2 Policy G5 of the draft London Plan sets out that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping, green roofs, green walls and nature-based sustainable drainage.
- I4.3 Policy DHI of the Royal Greenwich Local Plan states that developments proposals should be able to demonstrate that they positively contribute to the improvement of both the built and natural environments, and as such, will be expected to respect local topography, existing landscape settings, ridges and natural features, and retain trees where possible.
- I4.4 Moreover, Policy OS(f) sets out that proposals for new dwellings and buildings should be accompanied by a scheme of landscaping which should include environmentally appropriate planting, using locally native species, and the scheme should demonstrate appropriate irrigation plans for landscaping.
- I4.5 The existing site is dominated by hardstanding and built form, and there are no existing landscape features present on the site. The proposal includes the creation of a landscaped area to the south-west of the hotel, between the western façade and the A102. This area would include tree planting and the laying of grass, with other biodiversity gains such as wildflower planting to be agreed as part of the Biodiversity Enhancement Management Plan, which would be included as a condition of approval.
- I4.6 It is further noted that the south-west corner of the building would include a living wall, which would extend in parts up to the 8th floor. The inclusion of a green wall is considered to add interest to the elevational treatments of the hotel, and would contribute to biodiversity gains from the development. A

brown roof (7th floor) and a garden roof (3rd floor) are also proposed to further enhance biodiversity.

- 14.7 Subject to the inclusion of this condition, the proposal is considered to be acceptable in terms of its impact on biodiversity, and the proposal would therefore comply with Policy 7.19 of the London plan and Policy OS(f) of the Royal Greenwich Local Plan.

15 Security and Community Safety

- 15.1 Policy 7.3 of the London Plan states that development should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating. Policy DHI of the Core Strategy requires proposals to demonstrate that the development contributes to a safe and secure environment for users and the public. Policy CHI states that developments should consider community safety and aim to discourage crime and ensure that publicly accessible spaces and buildings such as streets, parks and public squares are well maintained and provide opportunities for natural surveillance.
- 15.2 The Designing Out crime Officer commented that the proposal is capable of achieving Secured by Design accreditation. The adoption of these standards will help to reduce the opportunity for crime, creating a safer, more secure and sustainable environment. A condition is recommended requiring the development to achieve Secured by Design accreditation as recommended by the Designing out Crime officer.

16 Impact on Existing Residential Amenity

- 16.1 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.
- 16.2 The proposed hotel would be 18 storeys high, plus a basement level and a rooftop enclosure for plant, although this rooftop enclosure would be largely hidden as a result of the proposed roof form. The apex of the largest element would be 76 metres above ground floor level, with the two smaller towers topping out at 45 metres and 31 metres.

- 16.3 The proposal is not located near residential developments with the nearest being the approved future residential developments under the Greenwich Peninsula Masterplan which are approximately 120 metres to the south-east and east of the site and the future redevelopment of Morden Wharf on the opposite side of the A102.
- 16.4 The proposal is supported by a daylight and sunlight assessment prepared Behan Partnership Limited which confirms there will be no impact to future residential developments in the Greenwich Peninsula Master Plan and future West Peninsula Masterplanning site.
- 16.5 The assessment further assesses neighbouring properties which are commercial (including the Dreadnought building). The assessment notes that commercial developments do not benefit from daylight and sunlight standards but has applied the BRE standards which assesses daylight and sunlight impacts to residential dwellings (main habitable rooms, not staircases, hallways, bathrooms, toilets etc). The assessment concludes the potential light to the windows of all nearby commercial buildings including the Dreadnought Building all fully pass the residential VSC 27% target value.
- 16.6 In consideration of the above, it is considered the proposal will not adversely impact on the amenity of nearby buildings and complies with relevant policy.

17 Noise and Air Pollution

- 17.1 Policy 7.15 of the London Plan seeks to ensure that development proposals manage noise by avoiding significant adverse noise impacts on health and quality of life. 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.
- 17.2 In addition, Policy D12 of the draft London Plan introduces the 'Agent of Change' principle, and places the responsibility for mitigating impacts from existing noise generating activities or uses on the proposed new noise-sensitive development.
- 17.3 The proposed development would introduce a 300-bedroom hotel onto a plot currently used as offices, with the surrounding area characterised by industrial uses. Moreover, the A102 directly to the west produces high levels

of noise, identified within the GP3 Planning Brief as a reason for siting commercial uses closer to the A102.

- 17.4 The proposed hotel use is considered to be less sensitive to loud noise than residential properties, but recognising that they provide sleeping accommodation, it is important to ensure that the acoustic environment for users of the hotel is reasonable. It should be noted that the Port of London Authority (PLA) has raised an objection, on the basis that inadequate consideration of the nearby safeguarded wharves has taken place. In addition, an objection has been raised in respect of Studio 338 to the north, on the grounds that future users of the hotel will likely complain about noise emitted from the nightclub and the hotel accommodation is therefore not appropriate.
- 17.5 An External Building Fabric Assessment has been submitted in support of this application, which includes a noise survey undertaken continuously over a period of four days, and this establishes a baseline level of noise. The PLA raised concerns in respect of the methodology used, as it was not clear if this survey would have included the loading or unloading of a barge, which typically generates higher levels of noise than the background level.
- 17.6 Whilst the concerns of the PLA are understood, it is considered that a period of four days to establish a baseline is appropriate, and the findings reflect the usual day-to-day activities associated with the nearby industrial sites. In any event, the A102 is a more significant emitter of noise for the application site, being significantly closer, and this is reflected in the noise survey results. Based on the information and specifications outlined in the External Building Fabric Assessment, it is considered that future guests of the hotel would experience an acceptable acoustic environment, and the proposal is acceptable in this regard. In reaching this conclusion, regard is had to the agent of change principle, and it is considered that the hotel can incorporate sufficient mitigation measures to overcome the issue raised.
- 17.7 An Air Quality Assessment (AQA) has been submitted in support of this application, which establishes a baseline for air quality, and discusses the potential impacts of construction and operation of the proposed hotel, and sets out mitigation measures which could limit this potential harm. The AQA concludes that with appropriate mitigation measures, to be controlled through the use of a condition requiring a construction method statement to be submitted for approval, there would be no significant impacts on local air quality during the construction process. In addition, owing to the low-intensity use of the hotel, compared to an industrial use for example, the proposal would have a neutral impact on local air quality.

- 17.8 The AQA further establishes, through modelling, that there would be no exceedance of the 1-hour mean NO₂ or 24-hour mean PM₁₀ AQOs predicted at the proposed development site. As such, baseline NO₂ and PM₁₀ concentrations resulting from road-traffic emissions do not represent a development constraint or require embedded mitigation into the scheme design.
- 17.9 As such, it is considered that the proposal is acceptable in terms of its noise and air quality impacts, and would comply with Policy E(a) of the Royal Greenwich Local Plan, subject to the conditions discussed above.

18 Wind and Microclimate

- 18.1 The NPPF in paragraph 110 states that pollution should be minimised as well as other adverse effects on the local and natural environment. Policy 5.3 of the London Plan states that development should ensure developments are comfortable and secure for users including avoiding the creation of adverse local climatic conditions. Policy 7.6 states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings which includes wind turbulence.
- 18.2 A qualitative wind microclimate assessment report was submitted with the application. The report concludes that wind speeds within all public access areas surrounding the development should remain at their present levels or be reduced with the addition of the proposed development and recommended wind mitigation treatments including:
- 18.3 The mitigation measures have been recommended as a condition. It is considered that subject to the recommended condition, the proposal would comply with relevant policy with regards to wind microclimates.

19 Waste and Refuse Provision

- 19.1 Policy 5.17 of the London Plan requires suitable waste and recycling storage facilities in all new developments, regardless of the size or scale and the siting of refuse storage areas should assist the local authority in fulfilling its statutory duty to collect waste from residential properties. Policy DH1 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.

- 19.2 A hotel bin store and compactor are proposed for the ground floor, accessed from the internal one-way road. The council's Waste Services team have confirmed that this bin store is in an appropriate location, within easy collection distance from Boord Street, and would be of an appropriate size.
- 19.3 As such, subject to a condition securing the creation of this area prior to occupation, the proposal is considered acceptable in terms of its refuse and recycling area. The proposal would therefore accord with Policy 5.17 of the London Plan and Policy DHI of the Royal Greenwich Local Plan, insofar as it relates to waste storage and collection.

20 Sustainability and Energy

- 20.1 Policy 5.2 of the London Plan states that proposals should make the fullest contribution to minimising carbon dioxide emissions, and further sets out that proposals for major developments should include a detailed energy assessment to demonstrate how the targets for carbon dioxide (CO₂) emissions should be met, where the target for residential buildings is to be zero carbon. Proposals should seek to minimise carbon dioxide emissions in accordance with the following energy hierarchy:
1. Be lean: use less energy
 2. Be clean: supply energy efficiently
 3. Be green: use renewable energy
- 20.2 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. In addition, all developments with a gross floor area greater than 500 sqm or residential developments of five or more units are required to connect to an existing decentralised energy network, unless it can be demonstrated that this is unfeasible or unviable, in which case sufficient infrastructure to enable a future connection should be provided. Policy DHI of the Royal Greenwich Local Plan further sets out that non-residential buildings in major developments should achieve a BREEAM rating of Excellent.
- 20.3 For the purpose of the London Plan and Royal Greenwich's Local Plan, CO₂ emissions are expressed as a percentage improvement over Part L of the 2013 Building Regulations.
- 20.4 Energy Statement Issue 10 prepared by Hydrock MRB Limited (28 February 2020) has been submitted to demonstrate compliance with the current London Plan (2016), Draft London Plan (2019) and Greenwich Local Plan Core Strategy with Detailed Policies (2014) energy and sustainability policies.

- 20.5 A range of energy efficiency measures are proposed and whilst they exceed the minimum requirements of the BR Part L 2013, it is considered that greater efficiency measures can and should be achieved, including investigating further fabric improvements.
- 20.6 Compliance with London Plan policy 5.9, which relates to Overheating and Cooling, has been demonstrated through the submission of the Dynamic Overheating Assessment. The results showed that all habitable spaces tested fail to comply with CIBSE TM52 comfort criteria under DSY1, DSY2 and DSY3 weather files. Active cooling is therefore proposed that will be provided through Air Source Heat Pumps. From the evidence submitted, it is obvious that the cooling demand, lighting and auxiliary consumption of the proposed development are higher than these of the notional and therefore should be minimised before active cooling is investigated.
- 20.7 The proposed energy servicing strategy involves a connection to the Greenwich Peninsula Low Carbon Energy Centre (GP LCEC) for the provision of hot water, and Air Source Heat Pumps to cover the hotel's space heating and hot water requirements. An energy centre is proposed at basement level to accommodate equipment to allow the offsite district heating network connection to take place. However, the applicant should investigate if the provision of space heating from the GP LCEC is more cost effective and efficient while also achieving higher carbon and energy savings.
- 20.8 A solar PV system of 20m² is proposed. The PV provision should be maximised regardless of carbon dioxide target being achieved. Further details should be provided at condition stage.
- 20.9 The proposed strategy is designed to achieve a 42% reduction in regulated CO₂ emissions, equivalent to 221 tonnes CO₂ per year, beyond Part L of the 2013 Building Regulations base (based on SAP2012 carbon emission factors). The development demonstrates compliance with the London Plan policy 5.2 which requires a CO₂ emissions reduction target of 35% and therefore no carbon offsetting contribution is required to offset any carbon shortfall.
- 20.10 A Sustainability statement including BREEAM Assessments at pre-commencement and post construction will have to be submitted to describe how the applicable sustainability policies and standards can be met by the proposed design.

- 20.11 Living roofs such as sedum or brown roofs, also known as extensive green roofs, will be incorporated on the 7th floor of the Proposed Development. A garden roof is also proposed on the 3rd floor. Details of the green roofs shall be submitted and secured by condition.
- 20.12 The proposed scheme is generally in compliance with the regional and local energy and sustainability policies. However, a number of areas need further improvement and as such, conditions and obligations are proposed to ensure that the applicant will commit to investigating these further improvements and implement them before and during the construction of the development.
- 20.13 On this basis, the proposal is considered acceptable in terms of its sustainability and energy requirements.

21 Flood Risk

- 21.1 Policy 5.13 of the London Plan states that new development should utilise sustainable urban drainage systems (SuDs) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.
- 21.2 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.
- 21.3 The proposal is supported by a flood risk assessment and drainage strategy report prepared by Walsh. The site is situated within Flood Zone 3, which is considered to be at high risk of flooding but benefits from being defended by the Thames Tidal Defences. The site remains at residual risk of a breach in the flood defence at a nearby location. The site is assessed to be at low risk of flooding from sewers and surface water and a low to negligible risk of flooding from all other sources.
- 21.4 The report recommends a number of mitigation measures to address the 'high' residual risk of tidal flooding during a breach scenario.
- 21.5 The council's Flood Risk Officer and the Environmental Agency both raise no objection with regards to flood risk subject to compliance with the mitigation measures detailed in the report. Standard conditions have been recommended including a condition requiring the final details demonstrating

compliance with the recommended flood mitigation measures in the report be submitted for approval prior to commencement of works.

- 21.6 On this basis, the proposal is considered acceptable and would comply with the requirements of Policy 5.13 of the London Plan and Policy E2 of the Royal Greenwich Local Plan.

22 Archaeology

- 22.1 Policy 7.8 of the London Plan and Policy DH(m) of the Core Strategy requires proposed developments to assess and plan for impacts on archaeological. The site falls within an identified area of high archaeological potential.
- 22.2 The proposal is supported by a Historical Environment Assessment report which assesses the potential archaeological impacts of the development. The report concludes that archaeological survival within the site is expected to be low (for Roman and medieval remains) to moderate (for prehistoric remains). Palaeoenvironmental remains are expected to be present within the alluvial deposits.
- 22.3 Historic England comment the development could cause harm to archaeological remains. However the significance of the asset and scale of harm can be managed via a condition requiring a WSI be submitted and approved by the Local Planning Authority prior to the commencement of works. A condition has been recommended accordingly.
- 22.4 It is considered that subject to recommended conditions, the proposal would comply with relevant policy with regards to archaeology.

23 Aviation

- 23.1 Core Strategy Policy IM(d) states that relevant applications will be required within the safeguarding boundary for London City Airport will be determined having regard to the advice received from the Civil Aviation Authority.
- 23.2 London City Airport has carried out an assessment from an aerodrome safeguarding perspective and has confirmed that there is no safeguarding objection to this development.

24 Hazardous Substances

- 24.1 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.
- 24.2 Policy 5.22 of the London Plan require that when assessing developments near hazardous installations, site specific circumstances and proposed mitigation measures should be taken into account when applying the Health and Safety Executive's (HSE) Planning Advice for Developments near Hazardous Installation methodology and the risks should be balanced with the benefits of development and should take account of existing patterns of development.
- 24.3 Following the revocation of the Hazardous Substance Consent for the East Greenwich Gas Holder in October this year, the site is now located in close proximity to one site used for the storage of hazardous substances as a general storage and distribution depot for inorganic and organic chemicals, operated by Brenntag located 65m to the west.
- 24.4 The Brenntag chemical storage site a lower tier site, and the HSE has identified consultation zones around the site comprising an inner, middle and outer zone. On 29 September 2019 an application for the continuation of hazardous substances consent granted in 1999 (Ref: 99/2274/HS) was called in and subsequently granted by the Secretary of State (Reference 18/1999/H). The Brenntag site is currently the subject of a Planning Application (18/1999/H) which seeks consent for the storage of Sodium Hypochlorite.
- 24.5 The proposed building envelope is located outside of the inner zone area of the HSE consultation zone for the Brenntag site. The inner zone affects the southern section of the proposed hotel site which comprises landscaping and cycle parking and the proposed development is therefore not considered at risk of the hazardous substance consent for the Brenntag site.
- 24.6 In conclusion, it is considered the proposal complies with relevant policy with regards to Hazardous substances.

25 Legal Agreement

25.1 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.

25.2 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
 - £70, 000 contribution for the creation of a dedicated controlled crossing slightly to the north of the junction between Boord Street and Millennium Way, and rectifying the poor public realm (including the small layby) between the junction and the proposed crossing site.
 - £50, 000 contribution towards improving the uninviting public realm on Boord Street, and pursue a pedestrian-priority shared surface. This would leave the hotel, Studio 338 and TfL with vehicular access, but there would be clear precedence for pedestrians over vehicles across the surface.
 - Details of London legible signage around the site to improve wayfinding to public transport stops, local sites of interest, or nearby civic buildings.
 - 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 any new street trees that are required along Boord Street as required to secure wind mitigation measures, as well as the removal or installation of crossovers.
 - To enter into an Asset Protection Agreement (APA) with Transport for London, prior to the implementation of the development to control matters relating to the construction of the replacement footbridge over the A102. The APA shall include the following terms:

- (a) Construction Management Plan
- (b) Traffic Management Plan
- (c) Coordination of Plant
- (d) Utility Works
- (e) Ground Movement Assessment
- (f) Insurance

- (g) Indemnity
- (h) Monitoring
- (i) Construction Access
- (j) Monitoring

- Sustainability Contributions
 - To carry out best endeavours to make provisions for, and to connect to, the nearby district heating network prior to the occupation of the hotel.
 - Monitor the effectiveness of the renewable technologies.
- Education and Employment Training
 - A £147, 411.00 contribution towards the funding of Greenwich Local Labour and Business (GLLaB), calculated at a rate of £10 per sqm, index linked.
 - 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

26 Public Sector Equality Duty (PSED) and Human Rights

- 26.1 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.
- 26.2 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.

27 Conclusion

- 27.1 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 jobs on-site.

- 27.2 The general height, scale and massing is considered to be appropriate, and the unique and distinctive design would create a sense of identity in an area which will be subject to a significant level of change but which currently has a broadly functional appearance.
- 27.3 Owing to its siting well away from existing residential properties, and its siting approximately 120 metres away from planned residential developments, it is considered that the proposal would not have a significant adverse impact on neighbouring amenity. Whilst conferred less protection than residential properties, it is further considered that the proposal would have no significant adverse impact on the surrounding commercial and business units.
- 27.4 Subject to the imposition of conditions controlling construction processes, and a travel plan once operational, it is considered that there would be no significant impacts on the local highway network as a result of the proposed development. Moreover, subject to an Asset Protection Agreement between Transport for London and the applicants, the proposal would not prejudice the delivery of the Silvertown Tunnel DCO.
- 27.5 As such, based on the above, it is considered that the proposal is acceptable, and is recommended for approval.

Background Papers:

The London Plan (2016), Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014), Planning Obligations (s106) Guidance SPD (2015), Greener Greenwich SPD (2014), The National Planning Policy Framework (NPPF) (2019), Greenwich West masterplan SPD (2012), The National Planning Practice Guidance (NPPG), Greenwich Peninsula Site GP3 Planning Brief (2017), The Draft London Plan (intend to publish March 2020), The Human Rights Act (1998), The Equalities Act (2010).

Report Author: Andrew Thornley
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