Strategic planning application stage 1 referral (new powers)


The proposal

Full planning permission is sought for a 452-bedroom hotel with ancillary uses including a 3,000 sq.m. event space and ballroom. The hotel will include a restaurant and health spa, with public membership access. There will also be a 100 unit serviced residential apartment block and 1.55 hectares of public and private landscaping and 250 secure parking spaces located within the hotel/ballroom podium.

The applicant

The applicant is Ansco Hotel Limited, and the architect is Lifschutz Davidson Sandilands.

Strategic issues

The application is consistent in land use terms with the approved master plan and will support the functions of O2 Arena and London Plan opportunity area objectives to promote regeneration of the Peninsula. There are strategic issues regarding urban design, access, affordable housing, energy and transport.

Recommendation

That Greenwich Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 77 of this report; but that the possible remedies set out in paragraph 79 of this report could address these deficiencies.

Context

1 On 28 January 2010, the Mayor of London received documents from Greenwich Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

2 The application is referable under Category 1B and 1C, of the Schedule to the Order 2008:

1B.1c) “Development (other than development which only comprises the provision of houses, flats, or
houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres.”

1C.1a) and c)

“Development which comprises or includes the erection of a building…where

a) the building is more than 25 metres high and is adjacent to the River Thames

b) the building is more than 30 metres high and is outside the City of London.”

3 Once Greenwich Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The site is located on Greenwich Peninsula, is at the northern end of the borough. A series of individual development plots were identified in parameter plans approved as part of the outline permission for Greenwich Peninsula. This site, plot NO301, lies immediately to the west of the O2 Arena, with the River Thames located to the north and west. Land to the south is currently derelict, but will form the Peninsula Quays development as set out in the approved master plan.

6 The site is vacant, apart from a ventilation shaft and pumping station, both will be retained. The vent shaft serves the Blackwall Tunnel, which runs underneath the site, and the pumping station serves drainage of the wider Peninsula area. These existing features, and the River Thames wall, are design constraints that have informed the layout of the proposals.

7 The A102 Blackwall Tunnel Approach runs through the Peninsula and forms part of the Transport for London Road Network, providing links to the M25, M11 and cross river connection via the Blackwell Tunnel. The site is served by buses, the Jubilee Line underground service as well as river services, which serve the Peninsula. As a result, the site has a good public transport accessibility level score of 4 (out of a range of 1 to 6 where 6 is the highest level of accessibility).

Details of the proposal

8 Full planning permission is sought for a 452-bedroom hotel with ancillary uses including a 3,000 sq.m. event space/ballroom. The hotel will include a restaurant and health spa, with public membership access. There will also be 100 serviced residential apartments and 1.55 hectares of public and private landscaping.

9 The hotel will be set as a series of three interlinking blocks of 8, 12 and 17 storeys in height. The events space/ballroom will form a low podium building facing the River Thames. It will be the largest in London and provide conference, exhibition, awards ceremony and convention facilities. The space within the facility is also flexible and is able to be divided into 8 function rooms. It is anticipated it will support around 160 events annually.

10 The serviced apartment block will be a 22 storey tower located at the northern end of the site, and will be connected at ground floor level to the main hotel building. Servicing of these uses will be through the existing O2 Arena service perimeter road, which bounds the site to the east. The composition of units within the apartment block is as shown below:
<table>
<thead>
<tr>
<th>type</th>
<th>quantum</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studio</td>
<td>16</td>
</tr>
<tr>
<td>1 bedroom</td>
<td>21</td>
</tr>
<tr>
<td>2 bedroom</td>
<td>48</td>
</tr>
<tr>
<td>3 bedroom</td>
<td>15</td>
</tr>
<tr>
<td>total</td>
<td>100</td>
</tr>
</tbody>
</table>

*Figure 1 serviced apartment bedroom size mix*

11 The proposals include landscaping and public and private open space. There will be 250 car parking spaces located within the hotel podium and a further 20 disabled parking spaces. Of the overall parking provision, 70 will be allocated for the serviced apartments. Nine staff parking spaces located at the rear of the hotel. A total of 214 cycle parking spaces will also be provided.

<table>
<thead>
<tr>
<th>USE</th>
<th>PROPOSED FLOORSPACE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hotel, including ancillary uses</td>
<td>40,181 sq m (GEA)</td>
</tr>
<tr>
<td>Serviced residential apartments</td>
<td>12,094 sq m (GEA)</td>
</tr>
<tr>
<td><strong>TOTAL (excluding car park)</strong></td>
<td><strong>52,275 sq m (GEA)</strong></td>
</tr>
<tr>
<td>Undercroft car park</td>
<td>6,225 sq m (GEA)</td>
</tr>
<tr>
<td><strong>TOTAL AREA</strong></td>
<td><strong>58,500 sq m (GEA)</strong></td>
</tr>
</tbody>
</table>

*Figure 2 proposed floorspace (source: applicant’s planning statement January 2010)*

**Case history**

12 On 23 February 2004 outline planning permission (ref 02/2903/O) was granted for the comprehensive redevelopment of the Peninsula, and for the permanent retention and change of use of the Millennium Dome (now ‘the O2 Arena’) to provide an arena and the Millennium Dome Waterfront leisure and entertainment area, as well as for the development of a Millennium Square.

13 The GLA has had extensive pre-application discussions prior to the submission of this particular application. The advice provided by officers was not formally issued in writing at the applicant’s request; however, advice has been given at meetings, in particular regarding the design of the proposals.

14 The Greenwich Peninsula outline master plan, permitted a hotel proposal of up to 60,000 sq.m. on land to the west of the O2 Arena. At that time the master plan proposals envisaged a 630 bedroom hotel with associated conferencing/banqueting facilities and 400 car parking spaces. It was to be the tallest building on the Peninsula, limited by condition to a maximum height of 103.75 metres (Condition 119 of the Outline Permission) in the interests of safety and operation of London City Airport.

**Strategic planning issues and relevant policies and guidance**

15 The relevant issues and corresponding policies are as follows:
• Economic development  
  London Plan; the Mayor’s Economic Development Strategy; draft replacement Economic Development Strategy

• World city role  
  London Plan

• Tourism/leisure  
  London Plan; Good Practice Guide on Planning for Tourism (DCLG)

• Mix of uses  
  London Plan

• Regeneration  
  London Plan; the Mayor’s Economic Development Strategy; draft replacement Economic Development Strategy

• Urban design  
  London Plan; PPS1

• Access  
  London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)

• Tall buildings/views  
  London Plan; RPG3A, View Management Framework SPG, draft Revised View Management Framework SPG

• Housing  
  London Plan; PPS3; Housing SPG; Providing for Children and Young People’s Play and Informal Recreation SPG, draft Housing Strategy; draft revised interim Housing SPG

• Affordable housing  
  London Plan; PPS3; Housing SPG, draft Housing Strategy; draft revised interim Housing SPG

• Density  
  London Plan; PPS3; Housing SPG; draft revised interim Housing SPG

• Sustainable development  
  London Plan; PPS1, PPS3; PPG13; PPS22; the Mayor’s Energy Strategy; Sustainable Design and Construction SPG

• River Thames/flooding  
  London Plan; Mayor’s draft Water Strategy; PPS25, RPG3B

• Transport  
  London Plan; the Mayor’s Transport Strategy; draft replacement Transport Strategy; PPG13;

• Parking  
  London Plan; the Mayor’s Transport Strategy; PPG13

16 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Greenwich Unitary Development Plan 2006 and the London Plan (Consolidated with Alterations since 2004).

17 The following are also relevant material considerations:

• The draft replacement London Plan, published in October 2009 for consultation.

• The Core Strategy (February 2008 Issues and Options).

World city role, regeneration, culture, tourism and leisure The London Plan identifies the Greenwich Peninsula as an Opportunity Area in the South East London sub-region and Thames Gateway. The sub-region is the Mayor’s priority area for development, regeneration and infrastructure improvements able to accommodate a minimum of 55,000 additional homes up to 2016 and 100,000 jobs up to 2026 (paragraph 5.98 of the London Plan). The plan states that Greenwich Peninsula has the land capacity for substantial amounts of development, contributing to regeneration of the Thames Gateway. The main focus for development should be at the north of the Peninsula around the O2 Arena. The Plan identifies two important strategic roles for the Peninsula; the first involves the development of the O2 Arena (Dome) as a leisure attraction of international significance. The second is to facilitate the area as a major contributor to meeting London’s need for additional housing.

19 The Plan also states that parts of suburban London, especially in the east, lack cultural facilities of local and sub-regional importance and that new facilities need to be developed in the
Thames Gateway for residents and to create new tourist attractions away from Central London. Sites for such facilities should be identified on the basis of a sequential approach on sites that have good access to public transport or improvements are planned. Facilities should be accessible to all sections of the community, including disabled people, and new provision should be focused on area with deficiencies in facilities.

20 The UDP recognises the existence of the outline planning permission (proposal mu19) and that land uses will come forward on that basis. Policy 3D.7 of the London Plan seeks that the target of 40,000 net additional hotel bed spaces are provided by 2026. The London Plan identifies appropriate locations for hotel development being within the CAZ, CAZ fringe, town centres and Opportunity Areas where there is good public transport accessibility, subject to local impacts and monitoring levels of concentration. This policy approach is also reflected in the draft consultation replacement London Plan, policy 4.5. The proposals are consistent with the land use aspirations of the master plan, and fall below the maximum floor space threshold of the master plan approval (60,000 sq.m.) and will provide a supporting function to the O2 Arena thereby contributing to the above objectives including the provision of new hotel bed spaces, local facilities (spa/gym/open space) and the provision of new housing, which is discussed further in this report.

**Urban design and access** Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B which address both general design principles and specific design issues. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London. In addition to Chapter 4B, London Plan policies relating to density (3A.3), sustainable design and construction (4A.3) and waterside development (4C.11, 4C.14, 4C.15) are also relevant. Design polices in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, views, and the Blue Ribbon Network. The consultation draft replacement plan includes further detailed design policy in Chapter 7.

22 The proposals would provide opportunities to address issues relating to the current lack of connectivity and civic space. The rationale of providing a new hotel new, serviced apartments and new open spaces to improve public realm and environmental conditions to this prominent site along the River Thames, is supported.

23 The proposed design indicates a clear departure from the approved built form illustrated in the approved Greenwich Peninsula master plan (2004) by Terry Farrell Architects, features a substantial tall curved structure that echoes the curves of the adjacent O2 Arena and is located between the river edge and the Arena, as shown in Figures 3 and 4.
Figure 3 approved outline master plan layout (Source: Applicant’s design and access statement January 2010).

Figure 4 approved outline massing of hotel tower (Source: Applicant’s design and access statement January 2010).
24 The evidence produced in the submitted design and access statement is considered adequate in justifying a departure from the built forms in the approved master plan. Officers are satisfied with the proposed height to the buildings, but the massing of the hotel block and ballroom block is considered bulky. As shown in Figure 5, the proposed ballroom block attempts to make reference to the shape and form of the River Thames by introducing a reflective concave facade. Whilst officers appreciate this design approach, the gesture is not considered sufficiently strong, due to the relatively long body of the ballroom block. The architect is therefore asked to increase the curvature of the facade to provide a stronger reference to its surroundings, and to reduce the perception of the hotel and ballroom as bulky volumes.

![Figure 5 Proposed scheme showing the hotel accommodation and ballroom block (Source: Applicant’s design and access statement January 2010).](image)

25 The location of the proposed serviced apartment block is appropriate as it maintains a good degree of visual permeability to the O2 Arena from both the western and southern approaches.

26 The materials proposed for the scheme are of high quality and are welcomed. The proposed cladding attempts to express the permanence and solidity of the proposed scheme by introducing strong vertical elements to the elevations. Whilst officers do not object to the rationale of using a strong built form to contrast the tensile and delicate nature of the O2 Arena, the cladding has dark tones, which is overly strong and imposing, failing to foster a harmonious relationship with the Arena. The vertical emphasis on the buildings should be reduced and lighter tones to the cladding should be considered. This will give the building a lighter appearance to that relate better to the dome shape and the tranquility of the adjacent River Thames.

27 Figure 6 shows the proposed landscape and public realm strategy. The proposed landscape scheme does not appear to have fully exploited the existing landscape and topography of the site. The proposed layout is overly rigid and formal, and does not sufficiently reflect the fluidity evoked by its surrounding architecture and riverside setting. The landscape configuration should be improved, particularly near the serviced apartment block where there is an opportunity to create a stronger relationship unifying the built form and the River Thames.
In terms of strategic views, the application site is within the periphery of London Panorama view Assessment Point 5A.1 of the London View Management Framework, which originates from the Wolfe Monument at Greenwich, along the axis of the Queen’s House towards Greenwich Reach, the Isle of Dogs and Canary Wharf. The O2 Arena (referenced as the Millennium Dome) is a landmark of this view and will eventually be obscured by the Peninsula master plan once it is fully constructed. The proposal does not significantly alter the view in the context of the wider panorama.

In summary, the significant challenges associated with developing this prominent site adjacent to the O2 Arena are recognised. The principle of development is supported and will revitalise the area around the Arena and its environs, establishing a new presence for the area in the Greenwich Peninsula. However, there still remain issues relating to the form of the hotel elevation, colouration, the cladding style to the scheme and landscaping, further work is therefore required to ensure that the proposals comply with the London Plan.

Access

London Plan Policy 4B.5 (and draft consultation replacement London Plan policy 7.2) requires proposals for development to meet the highest standards of accessibility and inclusion (not just the minimum building regulation requirements).
31 The application includes commitment to lifetime home standards. GLA design standards are referenced, but it is not clear if this includes the emerging residential space standards, which should apply to the serviced apartments. The layout in terms of inclusive access and level changes to the hotel, ballroom and surrounding area have been well considered. Internally there is a range of opportunities for movement of all potential future users. Whilst this is the case, the detail of hotel bedroom layouts needs to be considered. The draft consultation replacement London Plan, policy 4.5B seeks that 10% of hotel bedrooms are wheelchair accessible. It is not clear what provision has been made within the hotel. Consideration should also be given to meeting the best practice advice set out in the revised British Standard Code of Practice BS 8300 2009, which recommends that 5% of hotel bedrooms have a ceiling track hoist and 5% are easily adaptable for wheelchair users. In addition, the prospective hotel operator should be asked to assess themselves against the National Accessible Scheme as set out by Visit Britain (http://www.tourismtrade.org.uk/quality/assessmentstandards/nationalaccessiblescheme/default.asp?pf=y).

Children’s play space

32 Policy 3D .13 of the London Plan sets out that “the Mayor will and the boroughs should ensure developments that include housing make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs.” Using the methodology within the Mayor’s supplementary planning guidance ‘Providing for Children and Young People’s Play and Informal Recreation’ it is anticipated that there will be approximately 17 children within the development (based on the private housing mix currently proposed). The guidance sets a benchmark of 10 sq.m. of useable child playspace to be provided per child, with under-5 child playspace provided on-site. As such the development should make provision for 170 sq.m. of playspace. The applicant proposes 525 sq.m. play space and substantial area of public realm. The provision is welcomed, but layout of the public realm requires further consideration as set out above. Equipment for the play area should be agreed with Greenwich Council, and secured by condition.

Affordable housing

33 London Plan Policy 3A.10 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mix-use schemes. In doing so, each council should have regard to its own overall target for the amount of affordable housing provision. Policy 3A.9 states that such targets should be based on an assessment of regional and local housing need and a realistic assessment of supply, and should take account of the London Plan strategic target that 35% of housing should be social and 15% intermediate provision, and of the promotion of mixed and balanced communities. In addition, Policy 3A.10 encourages councils to have regard to the need to encourage rather than restrain residential development, and to the individual circumstances of the site. Targets should be applied flexibly, taking account of individual site costs, the availability of public subsidy and other scheme requirements.

34 Policy 3A.10 is supported by paragraph 3.52, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The ‘Three Dragons’ development control toolkit is recommended for this purpose. The results of a toolkit appraisal might need to be independently verified.

35 Policy SH5 of the Greenwich Council UDP seeks a minimum of 35% affordable housing on all new housing schemes of more than 15 units. Clause 51 of the section 106 agreement for the outline planning permission requires the delivery of 38% of housing provision as affordable housing across the development, allowing for some flexibility on individual sites.
36 The proposal includes the delivery of 100 serviced apartments. Serviced apartments would conventionally be classified as a ‘sui generis’ use and would not normally generate a requirement for affordable housing. This is because serviced apartment would normally be owned by the operator and leased by them on an ongoing basis subject to occupancy restrictions (usually 90 days maximum). As such they are not normally sold on the open market in the traditional sense and would not be occupied by any individual on a permanent basis.

37 In this instance the applicant wishes to adopt a model of serviced apartments that allows sale on the open market. The purchaser will then have the benefit from a range of hotel services as well as being able to put the apartment back into the hotel rental pool for use by the hotel operator. The ownership of the apartment would therefore be transferred on completion subject to usual sale restrictions and charges. The objective, as set out in the planning statement, is to generate cash flow to support the regeneration. Given the nature of these apartments as described by the applicant, the use formally constitutes residential C3, as the units can be fully occupied on a permanent basis, with the benefit of hotel services. The extent to which the units can be rented back to the hotel will be controlled by the section 106 agreement. The intention being to maintain the primary function of these units for residential accommodation. On the basis of the use classes order, an affordable housing contribution is required.

38 The applicant accepts that such a contribution may, in principle, be necessary on the basis described above. Whilst this is the case, no offer has been put forward at this stage. Instead the applicant has sought to justify the limited viability of the proposals through submission of viability information detailing the specific circumstances of the site. Greenwich Council has commissioned an independent valuer to test the applicant’s assumptions regarding costs and revenues. The GLA is in discussion with the Council and the independent valuer regarding the content of the viability submission. Further discussion on the affordable housing and how this will link into the housing mix offer is therefore required before the Mayor considers this case at the final determination stage.

Climate Change mitigation

London Plan policies 4A.4 to 4A.7 require the submission of an energy demand assessment along with the adoption of sustainable design and construction, demonstration of how heating and cooling systems have been selected in accordance with the hierarchy and how the development will minimise carbon dioxide emissions, maximise energy efficiencies, prioritise decentralised energy supply, and incorporate renewable energy technologies, with a target of 20% carbon reductions from on-site renewable energy.

Be lean

40 The baseline emissions have been calculated by the applicant using building regulations approved software. The baseline emissions should be updated to also include non-regulated energy associated emissions. They should also be expressed in total as tonnes per annum. For clarity, the applicant should provide the results output sheets from the modelling.

Energy efficiency

41 A series of demand reduction measures including measures to prevent overheating, reduced heat loss through improved fabric thermal performance, mechanical and heat recovery ventilation with low specific fan power and improved lighting efficiencies.

42 The U-value targets for the hotel and the serviced apartments are different, where the serviced apartments have more stringent targets. The applicant should investigate whether further improvements could be introduced for the hotel as there seems to be scope to reduce energy requirements further.
43 Modelling has shown that this would help to reduce carbon emissions by 20% for regulated energy use, in addition the applicant should provide the carbon dioxide reductions over the baseline emissions (including also non-regulated energy uses carbon dioxide emissions).

Be clean

44 The applicant is proposing several boiler plant rooms although the strategy is slightly unclear. With regards to district heating, the applicant needs to clarify where energy centres are located and the equipment associated with these plant rooms. The plans show two energy centres, one in the existing O2 Arena and one in the hotel building. It is envisaged that one energy centre should provide the heating for the whole development. The applicant should provide further information relating to how this would be incorporated in the operational regime of the proposed system on site. It is unclear whether the strategy will link into the existing system at the O2 Arena. Linking into the existing system is the preferred solution as set out in the energy hierarchy within the London Plan.

Combined heat and power

45 The proposals include a combined heat and power (CHP) unit with 230 kW electrical output capacity and 320 kW thermal output capacity. The applicant should investigate whether a larger CHP could be accommodated if incorporating thermal store. The CHP would further reduce the carbon dioxide emissions by 22%.

Cooling

46 The proposals include measures such as shading devices to reduce cooling demand and the risk of overheating. Cooling is proposed for the ballroom and hotel, but not for the serviced apartments. The cooling requirements are deemed insufficient to warrant absorption chillers, this is acknowledged.

Be green

47 The proposals include 325 square metre of photovoltaic panels located on the roof. This would further reduce the carbon dioxide emissions by 2%. Roof plans have been provided to show the layout. Although the applicant falls short of the target of 20% it is acknowledged that there is little scope for further reductions from renewable exists.

Possible conditions

Heat network:

*Prior to the commencement of development the developer shall submit to the Local Planning Authority for its approval details of the proposed heat network sufficient to meet the heating and hot water needs of the Development*

The proposed heat network shall be supplied with heat from either:

- combined heat and power system sized to the average combined heating and hot water load supplemented by condensing gas top-up boilers OR
- an external district heating network OR
- a combination of the two options above.
The approved heat network shall be installed as part of the Development and shall be operational prior to occupation of the Development and shall thereafter be retained except with the written consent of the Local Planning Authority."

Renewables:

“Prior to the completion of the development no less than 325 sq.m. roof mounted solar photovoltaic panels with a southern component and absent of significant shading throughout the year shall be mounted on the roof of the development and operational and shall thereafter be retained.”

Climate change adaptation

The London Plan promotes five principles in policy 4A.9 to promote and support the most effective adaptation to climate change. These are to minimise overheating and contribution to heat island effects, minimise solar gain in summer, contribute to flood risk reductions, including applying sustainable drainage principles, minimise water use and protect and enhance green infrastructure. Specific policies cover overheating, living roofs and walls and water.

Chapter 5 of the draft consultation replacement London Plan considers climate change adaptation, specifically policies 5.9 through to policy 5.15. The application responds to some of the policy requirements including energy efficient design, solar gain and flood risk (considered below).

Living roofs are proposed, which cover an area of approximately 3,000 sq.m. This accounts for 30% of the roof area. This should be conditioned by Greenwich Council.

The Council should also condition maximum water use targets of 105 litres per person per day for the hotel and serviced apartments in accordance with London Plan policy 4A.16.

Blue Ribbon Network

The development is within Flood Zone 1, 2 and 3 providing all three flood risk zones of low medium and high risk. The River Thames flood defences provide protection. A flood risk assessment has been carried out for the planning application in line with clause 82 of the outline planning consent and the requirements of PPS25 and the development plan.

The Flood Risk Assessment reports that the peak 1 in 1000 year tidal flood level, accounting for climate change, is 4.86 metres AOD, and the statutory flood defence level in this location is 5.23 metres AOD. This indicates that the site would not be at risk from high tides overtopping the defences in this instance. Ground levels within the site boundary do not fall below 5 metres AOD, and are therefore above the maximum predicted flood level. The minimum ground floor level is set at 6 metres AOD. If a breach in the flood defences was to occur, the site and development would remain safe.

In addition to the above, the applicant proposes to develop a drainage system that would utilise surface water for irrigation of the landscaping. This proposal is in line with London Plan policy 4A.14.

There should be arrangements such that future deliveries or construction waste can be transported by barge to and from the hotel in line with London Plan Policy 4C.8. The development should be conditioned to ensure that water transport is used for the removal of construction spoil and the delivery of bulk construction materials in accordance with London Plan policy 4C.8.
Transport for London

56 TfL issued pre-application advice to the applicant dated 8 January 2010, which has informed the development of the proposals.

London Underground/buses

57 It is not envisaged that the proposals will give rise to capacity issues for the buses or the Underground given the scale of the development is less than that envisaged in the master plan. The proposals should however, take account of in the development of the Bus Service Strategy for the Peninsula.

Car Parking

58 The proposals indicate a total of 250 car parking spaces, 180 for the hotel/ballroom and 70 for the serviced apartments.

59 Annex 4 of the London Plan outlines the maximum car parking standards that should be adopted. There is no specific reference to parking standards for hotels or conference/ballroom facilities, however, the plan emphasis the need to avoid over provision of car parking.

60 For one and two bed residential units (used as a guide for determining the level of parking for the serviced apartments) a maximum of one car parking space per unit is acceptable and, in areas where there is good public transport accessibility (such as the application site), the aim should be less than 1 space per unit.

61 The gymnasium/spa element is considered incidental to the other uses on site for the purposes of the assessing the car parking requirements. The consultation draft replacement London Plan reflects the Mayor’s current approach to strategic planning in London and whilst not adopted policy still constitutes a material planning consideration for the purposes of assessing this application. In respect of hotels in locations having a good access to the public transport network (PTAL 4-6) on-site provision should be limited to operational needs, parking for disabled people and that required for taxis, coaches and deliveries/servicing.

62 The possibility of further reductions in car parking has therefore been explored with the applicant who considers the location requires the provision as proposed and has indicated that the original hotel proposals car parking was provided at a ratio of 0.63 whereas the current application the ratio is 0.4.

63 Similarly, a reduction in car parking provided for the serviced apartments was encouraged by TfL to support the overall sustainability argument as proposed in the Mayor’s emerging London Plan policies. Other developments on the Peninsula are delivering a lower levels of car parking provision (0.5 spaces per unit) for residential development. It is however, recognised that the car parking figure remains consistent with the London Plan and the levels of car parking and that as expressed in the master plan. The proposed level of car parking proposed therefore complies with the adopted London Plan policies.

Electric Vehicle Charging and Car Club

64 Initially, 10% of the car parking spaces will have access to electric vehicle charging points with the opportunity to provide addition provision as monitored through the proposed travel plan. This measure is welcomed.
65 The applicant has also advised that there may be the opportunity to provide links to a car club. This arrangement should be part of the travel planning arrangements as contained in the submitted travel plan particularly for the serviced apartments.

Cycle Parking

66 The Transport Assessment proposes 169 secure cycle parking spaces while the planning statement states 215 spaces. This anomaly should be clarified, although the lower figures still provide adequate cycle parking provision to meet the London Plan requirements for the serviced apartments (1 space for each unit) with access to cycle parking for hotel guests (15 spaces) and hotel staff (45 spaces). Showers, lockers and changing facilities for staff are also provided. The applicant has indicated there may be the opportunities for cycle hire, again it is recommended that this be developed through the travel planning arrangements.

Servicing/construction logistics

67 There is adequate provision for servicing the hotel, ballroom and serviced apartments with dedicated loading bay areas provided. The applicant has also indicated that prior to the construction of the hotel a construction and logistics plan, consistent with the requirements of the master plan will be submitted. It is recommended that these details be secured either by condition or through a section 106 agreement. The construction logistics plan should explore the use of the River Thames for the transport of construction materials as set out above.

Coach Parking

68 Coach parking for the hotel has been shown, it is however, recommended that the applicant ensure that provision be made for the larger 15 metre coaches.

Taxis

69 The modal split for taxi usage for the hotel across the day is reasonably strong and whilst there is an existing taxi rank at North Greenwich Station interchange, visibility to this rank is not possible. There will be an expectation that hotel users will wish to pick up taxis “at the door” without needing to walk to the interchange. It was therefore recommended to the applicant during the pre-application discussions that some form of link up with the existing rank by the interchange or a lighting system/indicator or variable messaging sign at the top of Millennium Way should be considered in order to alert taxis that a pick-up is required at the hotel. This does not appear to have been addressed in the current submission.

Wayfinding

70 Further consideration is needed as to how hotel occupiers will access the hotel, particularly from North Greenwich station/interchange including directions to London River Services and the Thames Clipper Pier. It is understood that finger post/wayfinding measures, consistent with the rest of the Peninsular will be provided. TfL would promote the use and principles of “Legible London” for any wayfinding proposals. The applicant has indicated that the pedestrian approach to the hotel will be improved through the forthcoming home zone highway layout from the development on land to the south. This area, however, is outside the application site boundary and does not form part of the current application. A pedestrian audit (PERS) for pedestrian routes to and from the station would inform what works may be required, which would particularly be necessary if the home zone area were not to come forward.
Blackwall Tunnel Safeguarding

71 It is essential that TfL’s infrastructure, in particular the Blackwall Tunnel bores and vents, are adequately protected and access to the tunnel vents can be ensured during both the construction and end process.

72 Access to the Blackwall Tunnel vents will need to be maintained and there will be a requirement for 24 hour access to the vent shafts, for vehicles to travel both in and out, for the fire brigade, emergency services and TfL. An area around the vents must be secure (fenced) and have their own compound arrangements. This will need to be controlled either by condition or though a section 106 agreement which should be drafted by Greenwich Council in discussion with TfL.

Conclusions

73 Whilst the principle of the hotel development is accepted and is consistent with both the London Plan and the emerging policies in the consultation draft replacement London Plan, the applicant should explore further reducing car parking numbers and consider further reductions. Whilst no capacity issues are envisaged for the London Underground, the hotel should factor in the bus service improvements strategy for the Peninsula. The travel plan should be used to secure future measures, such as the car club, cycle hire, and electric vehicle charging points. There should also be servicing and delivery plan and construction logistics plan that looks at opportunities for using the River Thames. Confirmation that 15 metre coaches can be provided for, taxi measures and wayfinding need to be addressed. Finally, the Blackwall Tunnel safeguarding must be agreed with TfL.

Local planning authority’s position

74 The Council are reporting the application to planning committee in March 2010. The officer recommendation is unknown.

Legal considerations

Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor’s statement and comments.

Financial considerations

75 There are no financial considerations at this stage.

Conclusion

London Plan policies regeneration, tourism, urban design, access, affordable housing and transport on are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:
• Regeneration and tourism: the proposals are consistent with the master plan land use aspirations and the opportunity area objectives to regenerate the Peninsula and support the functions of the O2 Arena and provide new housing. (Compliant)

• Urban design and access: the response of the proposals to the specific context is limited. The formal layout of the landscaping does not respond to the fluidity of the river context. Layout of hotel bedrooms in terms of accessible bed spaces is not shown. (Non compliant)

• Affordable housing and mix: the affordable housing offer and mix requires independent scrutiny. An affordable housing offer has not been put forward at this stage. (Non compliant)

• Climate change mitigation: technical clarifications and commitments are still required as set out in the main body of this report. (Non compliant)

• Climate change adaptation: subject to conditions regarding water use targets and living roofs. (Compliant)

• Transport: as set out in the main body of this report. (Non compliant)

77 On balance, the application does not comply with the London Plan.

78 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

• Urban design and access: further work relating to the form of the hotel, colouration, the cladding style to the scheme and landscaping. Further work is also required regarding inclusive access within each hotel bedroom, example layouts should be provided.

• Affordable housing: Subject to the conclusions of the independent valuer, the affordable housing offer needs further discussion and will need to be agreed and secured through the section 106 agreement.

• Climate change mitigation: technical response to the points set out in the main body of this report. Greenwich Council should consider the use of proposed conditions set out in this report.

• Transport: as set out in the main body of this report.

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