Strategic planning application stage 1 referral (new powers)


The proposal

Full planning application for the development of a 7-storey building for apart-hotel use, and change of use in part of an existing building from office to apart-hotel use. The application will provide 137 apart-hotel rooms, and office/retail space at ground level.

The applicant

The applicant is **Sunlight Properties Ltd.**, and the architect is **Weston Williamson Architects**.

Strategic issues

The proposed change of use from office/commercial space to **hotel** use is acceptable in London Plan terms; the provision of **improved pedestrian connectivity** across the site is welcomed; and the general approach to the **design** of the building is broadly acceptable. The **energy strategy** must be revisited to ensure it complies with the London Plan energy hierarchy; further information and design development is required to ensure the proposal is exemplary in terms of **sustainable design and construction**, addressing questions around **water efficiency** and **drainage**. The **ground floor layout** should be further developed and revisited to ensure a safe, secure, **inclusive** and sustainable development. The proposal does not incorporate **blue badge car parking**, and the **transport assessment and travel plan** are not compliant with London Plan policies. Further information pertaining to the **cycle parking** and **coach** accommodation measures are required.

Recommendation

That Southwark Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 70 of this report; but that the possible remedies set out in paragraph 72 of this report could address these deficiencies.

Context

1) On 15 October 2008 the Mayor of London received documents from Southwark 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 25 November 2008 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 3E of the Schedule of the Order 2008: “Development which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated; and comprises or includes the provision of more than 2,500 square metres of floorspace for a use falling within the following class in the Use Classes Order – class C1 (hotels).”

3 Once Southwark 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 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 lies on the west side of Tower Bridge Road, surrounded by a mix of commercial and residential uses. The site is not in the central activities zone (CAZ) or in a designated town centre. The site is bounded by a 5-storey Premier Inn hotel to the north and the A100 Tower Bridge Road to the east. Immediately south of the boundary is a break in the street frontage to provide a service access route and then a 9-storey development at 151 Tower Bridge Road. The boundary of the Bermondsey Street Conservation Area runs along the western edge of the site, with the backs of converted warehouses (4, 5 and 6 storeys) built straight up to the site boundary.

Aerial view of the site (highlighted in yellow) along Tower Bridge Road. 153 Tower Bridge Road is the existing building on the left; the empty site to the right is 157 Tower Bridge Road (source: Sunlight Properties)

6 The building on site at 153 Tower Bridge Road is an 8-storey building developed under a previous planning application, with retail space at ground level along the street frontage, residential units above the retail space, and office space at the rear. There is a narrow passageway
at the rear of 153 Tower Bridge Road that runs between the back of the building and the site boundary. 157 Tower Bridge Road is a vacant site which previously held an antiques showroom and warehouse building.

7 Tower Bridge Road is part of the Transport for London Road Network (TLRN), along with the A200 Tooley Street / Druid Street and the A2 Great Dover Street / Old Kent Road, both of which are within 650m of the site.

8 The site has a public transport accessibility level of 3 on a scale of 1 to 6, where 6 is most accessible. The site is within walking distance of London Bridge station, providing access to rail services and Jubilee and Northern line Underground services. Bus stops on Tower Bridge Road are adjacent to the development site. Numerous bus services run along Tower Bridge Road and Tooley Street / Druid Street as well as other surrounding streets.

**Details of the proposal**

9 The proposal incorporates the retention of 153 Tower Bridge Road, and construction of a 7-storey building at 157 Tower Bridge Road, to providing retail/commercial floorspace at ground floor level and apart-hotel rooms on the upper floors. The application also seeks to change the use of 1,880 square metres of vacant office space in 153 Tower Bridge Road to apart-hotel use connected to the new building at 157 Tower Bridge Road.

Aerial view of proposal (retained building and new building) from the back (source: Sunlight Properties)

10 The hotel would have 137 rooms in total across the two sites comprising 4,217 square metres of hotel floorspace. Twenty existing residential units in 153 Tower Bridge Road would be retained and would share a lift core with the apart hotel. The currently occupied ground floor retail unit in 153 would remain, and an additional 599 square metres of ground floor commercial/retail floor space would be provided at the rear of 153 and front and rear blocks of 157.
The new building will have two 7-storey volumes separated by a small courtyard and connected to 153. The courtyard will be accessible to the ground floor commercial and retail units, and the hotel rooms would look out on it. The western volume would be pulled back from the western boundary to open up a north-south pedestrian link from Bermondsey Park in the south to Tanner Street park in the north.

The proposal incorporates a public ‘right of way’ at the rear of 157 Tower Bridge Road to complete a north-south pedestrian link which was blocked by the previous building on site. The applicant also proposes to introduce a landscaping scheme at the south-western corner of the site to address the level change and improve an existing east-west pedestrian link to the south of 153 Tower Bridge Road.

Case history

Planning permission was granted in 1997 for 151-155 Tower Bridge Road, providing for two buildings on the site. Further planning applications in 2000 and 2003 were submitted to amend the 1997 permission. The 2003 planning application was granted permission in 2007, providing for the retention of buildings already constructed to accommodate 69 flats, offices on ground-sixth floors and retail space on the ground and first floors, with parking at basement level.

Strategic planning issues and relevant policies and guidance

The relevant issues and corresponding policies are as follows:

- **Mix of uses and tourism**  
  London Plan; Good Practice Guide on Planning for Tourism (DCLG)
- **Retail**  
  London Plan; PPS6; PPG13
- **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)
- **Sustainable development**  
  London Plan; PPS, PPS Planning and Climate Change Supplement to PPS1; PPS3; PPG13; PPS22; the Mayor’s Energy Strategy; Sustainable Design and Construction SPG
- **Employment**  
  London Plan; PPG4; draft PPS4; Industrial Capacity SPG

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 2007 Southwark Unitary Development Plan and the London Plan (Consolidated with Alterations since 2004).

The Southwark Core Strategy (Issues and Options stage) is also a material consideration.

Mix of uses and tourism

The proposal features the loss of 1,880 square metres of Class B(office) space, replaced with a 137-room apart hotel and 599 square metres of commercial and retail space. London Plan policy 3D.7 ‘Visitor accommodation and facilities’ identifies the need for improved quality, variety and distribution of visitor accommodation in London, including apart-hotels. The London Development Agency notes that the Mayor’s Tourism Vision seeks to ensure that London expands as a global tourism destination, develops a broader visitor base and spreads the benefits of tourism throughout the capital. To accommodate potential growth, it is estimated that a further 40,000
net hotel bedrooms should be provided in a period up to 2026 in a range of suitable locations throughout London.

18 Several hotels are already located in the area, notably a Premier Inn next to the site and several apart-hotel properties owned by the current applicant nearby. Whilst London Plan policy does resist intensification of the provision in such areas to ensure local amenity and the balance of local land uses is not compromised, the applicant considers the market to be under-served and is therefore proposing additional capacity to complement existing provision.

19 London Plan policy 3B.9 encourages the development of the tourism provision in town centres and locations with good public transport access. This site, whilst not in a town centre, does have good public transport access and is within walking distance of the central activities zone, and is therefore considered appropriate for hotel development. The additional hotel rooms will add to the hotel offer in the area and will complement existing facilities, and will provide additional capacity to meet projected needs. Further to this, the London Plan does not require the protection of office space in this location. The proposed change of use from commercial space to hotel use is therefore acceptable.

20 As part of hotel development the London Plan seeks agreements to provide affordable staff accommodation as part of hotel development; the applicant should endeavour to provide staff accommodation on site, or nearby. The existence of the recently completed residential development on site would suggest that there may be opportunities to achieve this.

**Urban design**

21 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.

22 The proposal improves pedestrian connectivity through the site by seeking to address the challenge of the level changes in the east-west pedestrian connection along the southern boundary, as well as taking the opportunity of redevelopment to complete the north-south pedestrian connection at the western boundary by pulling the building back from the western boundary. These are beneficial aspects of the scheme.

23 The proposal remains within the massing of the existing seven-storey building on 153 Tower Bridge Road, with the new building proposed on the adjoining site also seven storeys, although with the upper storeys set back. This is appropriate to its context, mediating between the five-storey Premier Inn to the north of the site and seven-storey existing building at 153. The setback upper storeys on the rear block ensure the building does not become too oppressive along the pedestrian path and respects the scale of the buildings opposite in the conservation area.

24 In the existing building, the eastern (front) half of each of the upper floors is already developed as residential units, whilst the western half of each floor is commercial space. The proposal seeks to convert the commercial space at the rear to apart-hotel units. The plans suggest two entrances to the hotel, one on Tower Bridge Road and one to the south of the building, from the service access alleyway between 153 and 151 Tower Bridge Road. This can be seen on the site plan on the next page. It is unclear which would be the primary entrance, however the access statement suggests that the main hotel lift will be the one nearest the rear entrance, whilst a secondary lift access will be provided by allowing hotel guests to use the lift to the residential units. This arrangement raises questions about access, security, management and capacity of the lifts.
The proposal incorporates commercial space at the rear of both buildings. The applicant has provided evidence to demonstrate the lack of commercial interest in the existing office space at the rear of the site, and has suggested that this is in part due to its location at the rear of the
site. This justification raises concern that the proposed ground floor office space at the rear of 157 in particular could be successfully let to provide the desired overlooking and activity to the pedestrian passageways. The applicant should reconsider the approach to the uses at ground floor, perhaps to incorporate uses associated with the hotel such as a fitness suite, to ensure that the proposed office spaces will not remain unoccupied, thus raising concern relating to safety and security on the pedestrian path.

26 The design of the new building is appropriate to the hotel use on upper floors and the retail/commercial space at ground level. The main elevation uses aluminium cladding to create a gridded frame with inset glazed and coloured panels. The colours to Tower Bridge Road will reference the colour of locally used materials, whilst the elevations to the interior courtyard and the pedestrian passageway will use differently coloured panels.

27 The proposal is broadly compliant with London Plan policy 4B.1, but further information must be submitted to demonstrate that the ground floor spaces at the rear of the building will contribute to safe, secure and sustainable environment, that the access arrangements for residential and hotel use ensure the proposal is accessible and usable, and that the proposal will be convenient and welcoming with no disabling barriers.

Access and inclusive design

28 The design of the landscaping and the public realm is crucial to how inclusive the development is to many people. Pedestrian routes to each building have been designed to ensure full and easy access for all users, but it is unclear whether the landscaping features have taken account of the principles of inclusive landscape design. The indicative landscape drawings suggest that steps and a ramp will be incorporated into the landscaping along the east–west path; details of this design should be provided.

29 The applicant has proposed to provide 10% of the hotel rooms to be wheelchair accessible, which is above the 5% minimum required under the Building Regulations. It is unclear where pickup and dropoff arrangements for disabled guests will be.

30 The wheelchair accessible guest rooms are not the most easily accessed from the ‘primary’ or rear lift, requiring wheelchair users to navigate several turns and doors to get to the rooms. The single lift access cores also raise concern relating to disabled and wheelchair access for the guests particularly in the event of a lift breakdown, at which point guests will have to use the residential lift.

31 The proposal is broadly compliant with London Plan policy 3A.5, but further information must be submitted to demonstrate that all public and landscaped space is designed to be fully inclusive for all, and that the internal access arrangements are satisfactory.

Climate change mitigation

32 The London Plan requires developments to make the fullest contribution to the mitigation of and adaptation to climate change, and to minimise carbon dioxide emissions (Policy 4A.1).

33 Policies 4A.2 to 4A.8 of the London Plan focus on how to mitigate climate change, and the carbon dioxide reduction targets that are necessary across London to achieve this. London Plan policies 4A.4 and 4A.7 require the submission of an energy demand assessment along with the adoption of sustainable design and construction, a demonstration of how heating and cooling systems have been selected in accordance with the Mayor’s 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.

34 A range of energy efficient design measures are proposed that reduces emissions by 6.9% beyond Building Regulations 2006. A combination of renewable sources (solar thermal and biomass boiler) is proposed to supply the domestic hot water requirements reducing emissions by a further 13.8% to meet part of the 20% renewable energy target. Air source heat pumps distributed on every few floors are proposed for the space heating and cooling to each of the apartments.

Energy efficiency (‘Be lean’) – policies 4A.3 and 4A.4
35 The applicant has modelled the baseline emissions for the scheme using appropriate software. This demonstrates that the development complies with current building regulations. However, the energy used by non-regulated emissions, such as appliances and cooking, should also be accounted for and included in the baseline emissions.

36 Although the applicant has reduced emissions by 6.9% through the installation of efficient plant the applicant has not proposed any building fabric related energy demand reduction measures, such as improved insulation and air tightness. Further information must be submitted to address how the proposal will reduce CO2 emissions beyond the requirements of building regulations through demand reduction measures alone. This is required to comply with the first stage of the energy hierarchy.

Decentralised energy and combined heat and power (‘Be clean’) - policies 4A.5 and 4A.6
37 The applicant has investigated the possibility of connecting to a district-heating scheme however there are currently no suitable site wide district-heating networks to which this scheme could connect.

38 The proposal incorporates a centralised heating system using renewable energy (solar thermal and biomass boiler) for the hot water demand to meet the 20% target for renewable energy. However, before the consideration of renewable energy technologies, the applicant is required to investigate the feasibility of using a combined heat and power (CHP) to meet the hot water demand for the scheme. As set out in the energy hierarchy, CHP should be prioritised before considering renewable energy sources such as solar thermal and biomass.

39 The applicant proposal also incorporates air source heat pumps (ASHP) for space heating, which may be acceptable, but this should not preclude the use of a CHP to meet the hot water demand.

40 The applicant has given consideration to the cooling strategy for the development and how it will be met. The cooling load for the development is not sufficient to justify the use of tri-generation. The applicant proposes to meet the cooling demand with the ASHPs.

Renewable energy (‘Be green’) - policy 4A.7
41 As noted above, the proposal currently incorporates solar panels and biomass for hot water, but the applicant has not prioritised the use of CHP in devising the energy strategy. After the feasibility analysis of CHP is undertaken, the proposed renewable sources are unlikely to be suitable and as a consequence, the options appraisal will have to be revisited. Options investigated should include ground source heat pumps and photovoltaic panels.

42 As noted above, the proposal incorporates ASHPs to provide space heating and nominal cooling for the building. Ground source heat pumps may provide greater efficiencies and improved long-term benefits, and as such the applicant should investigate the viability of using ground source heat pumps for this scheme.
Overall

Generally, sufficient information has been provided to understand the proposals, but further details are required in particular areas. In devising the energy strategy the applicant has not followed the energy hierarchy set out in Policy 4.A1, and as such the proposals must be revisited to ensure the development will make the fullest contribution to the adaptation to climate change. The proposal currently does not comply with London Plan policies 4A.1, 4A.3, 4A.4, 4A.6 and 4A.7.

Climate change adaptation

44 The London Plan promotes five principles in policy 4A.9 to promote and support the most effective adaptation to climate change. Developments are required to be adaptable to the climate they will face over their lifetime and address the five principles set out in policy 4A.9 of the London Plan. 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, minimising water use and protecting and enhancing green infrastructure. Specific policies cover overheating, living roofs and walls, and water.

Overheating

45 London Plan policy 4A.10 requires developments to be designed to address overheating, using a range of design considerations and measures such as site layout, natural ventilation systems, and use of appropriate building materials such as those with high thermal mass and incorporation of green infrastructure such as a green roof.

46 The site layout and orientation is constrained by the limited site area and surrounding development, but the design does allow for passive shading from surrounding buildings. The detailed design includes louvres, operable windows, courtyards and two roof terraces. Despite having a flat roof surface the proposal does not incorporate a green roof, and whilst there is a courtyard proposed at ground level with three trees, the proposals for the ground plane are predominantly hard landscaped.

47 The applicant should provide a green or living roof and seek to increase the permeability of the landscaping, potentially to include more greenery in the pedestrian passage to the rear. Much more information should be submitted with regards to the performance of the proposed materials and the passive design measures incorporated to limit overheating.

Water conservation and sustainable urban drainage

48 Policy 4A.14 seeks to ensure that surface water run-off associated with a proposed development is managed as close to its source as possible, and sets out a hierarchy of preferred measures to achieve this. Policy 4A.16 seeks to ensure that new development has proper regard to the impact of those proposals on water demand and existing capacity by minimising the use of treated water and maximising rainwater-harvesting opportunities. The policy seeks to maximise rainwater-harvesting opportunities and promotes the use of grey water recycling and dual potable systems.

49 As noted above, the proposal does not incorporate a green roof, and limited information has been provided to determine whether the development addresses the standards as set out in the Sustainable Design and Construction SPG with regards to water efficiency in particular. Water efficiency measures, rainwater and grey water harvesting systems should be incorporated in the development.
London Plan policy 4B.10 expects all large-scale buildings to illustrate exemplary standards of sustainable construction and resource management. The scheme anticipates gaining a BREEAM Very Good rating, whereas an exemplary building would achieve an ‘excellent’ rating. The proposal therefore does not comply with London Plan policy 4B.10. Furthermore, given the lack of information provided with regards to waste, and absence of any green roof, water efficiency, or water harvesting systems, the proposal does not currently comply with London Plan policies 4A.9, 4A.11, 4A.14, or 4A.16.

Transport for London’s comments

The transport assessment fails to provide any quantitative impact assessment on trip rate and modal split for the proposal. A robust trip rate and modal split assessment must be undertaken in order to determine whether the proposal is in compliance with London Plan policy 3C.2 ‘Matching development to transport capacity’. Further information has been submitted by the applicant to address this concern but TfL was not able to review the information in the required timescale.

Car parking

TfL welcomes the car-free nature of this development. However, the non-provision of blue badge parking is unacceptable as this directly contravenes London Plan policy 3C.23 and Annex 4 regarding appropriate provision for blue badge parking. A minimum of one off-street blue badge parking bay must be provided and designed to comply with the DDA 1995 standards.

As the site access is from the TLRN, the applicants are advised that all vehicles associated with the proposed hotel (includes guests/visitors/staff) must only park/stop at locations and within the periods permitted by existing on-street restrictions.

Cycle parking

TfL is unable to determine whether the proposed level of cycle parking is consistent with TfL cycle parking standards and London Plan policy 3C.22 ‘Improving conditions for cycling’. Further information is required including a schedule of proposed development quantum. The type of cycle parking provided must be of a type that allows secure cycle parking practices; TfL can offer further advice about this. Cycle parking must be secure, covered and easily accessible to all users and security measures such as CCTV surveillance be utilised in the cycle parking areas. Shower and changing facilities should be provided for employees of the retail and commercial land uses.

Walking

TfL welcomes the proposed pedestrian link between Tower Bridge Road and Newhams Row; adequate lighting, security and landscaping should be provided to ensure the safe and smooth passage of pedestrians. TfL requests that conditions be imposed to ensure that the pedestrian link will be adequately maintained and open for use by public throughout the day.

Coaches

TfL considers that the apart-hotel development could be likely to generate coach trips, despite the developer’s intention that rooms are unlikely to be rented to tourists or coach parties. The layout of an apart-hotel can be easily adopted as a hotel without undertaking any significant alterations if required for commercial reasons. TfL cannot accept the developer’s ‘assurance’ that zero coach trips would be generated from the proposed development.
TfL’s initial view, therefore, is that a drop-off/pick-up facility should be provided by allowing coaches to use the existing loading bay adjacent to the site, subject to the outcome of further feasibility studies and statutory consultation processes. The mixed used (loading and coach) facilities have been successfully implemented by Westminster City Council and on the TLRN in the Hackney area. The developer is therefore requested to contribute towards the investigation for additional provision of coach pick up/set down facilities in the vicinity of the site on Tower Bridge Road, and to subsequently contribute toward the costs for the provision of the new facilities via a S278 agreement.

Servicing

The proposed servicing arrangement which allows servicing to be undertaken off the TLRN (A100 Tower Bridge Road) is supported. TfL requests that a Delivery & Servicing Plan, as referred to in the London Freight Plan, be submitted and approved by TfL.

Construction

A Construction Management Plan (CMP) and Construction Logistics Plan will be required in order to minimise the impact of construction traffic on the adjacent TLRN. This should also take the likely cumulative construction movements of any other nearby developments into consideration. The CMP should be prepared and agreed with TfL and conditioned as part of any planning permission for this scheme.

The applicants are advised that the footway and carriageway on Tower Bridge Road must not be blocked during the construction and maintenance of the proposal. Temporary obstruction during the construction must be kept to a minimum and should not encroach on the clear space needed to provide safe passage for pedestrians, or obstruct the flow of traffic on A100 Tower Bridge Road.

Travel plan

Further work on the travel plan is required before it could be considered to be in compliance with London Plan policy 3C.2 ‘Matching development to transport capacity’. TfL expects the travel plan to be iTRACE compliant and secured, enforced, monitored and reviewed as part of the Section 106 agreement.

Section 106 contributions

As the car-free nature of the development will increase demand on the public transport network, TfL requests that the developer contribute towards upgrading bus stops on Tower Bridge Road to meet London Bus Initiative (LBI) accessibility standards. LBI standards are set out in TfL’s Bus Priority Team technical advice note BP1/06. This cost would be capped at £10,000 per stop for a maximum of £20,000.

Summary

TfL has serious concerns about the development proposals and requires significant further information before this application could be supported. In particular, analysis of expected travel demand is required, a blue badge car parking space must be provided off-highway, and improvements to the travel plan are necessary. Further information pertaining to the cycle parking is needed, along with the developer’s commitment to developing servicing management and construction management plans. A contribution of £20,000 is requested towards bus stop accessibility measures and a further contribution towards an investigation of appropriate coach mitigation measures should be provided.
Employment

64 The London Development Agency encourages the Council to obtain an Employment and Training Strategy from the applicant in accordance with London Plan policy 3B.11 (Improving Employment Opportunities for Londoners) in order for local businesses and residents to benefit from the development. Although there will not necessarily be a substantial amount of construction work as a result of the proposal, the applicant should ensure that local businesses and residents are recruited for the conversion and fit-out works for the apart-hotel and advertisements should be made accordingly (Job Centre notices, leaflet drops, adverts in local papers etc).

65 The service/hospitality sector is a major driver of employment growth in London. These sectors help aide regeneration and most importantly help to facilitate entry into the labour market for people with few qualifications or those seeking flexible employment opportunities. The applicant should consider contributing to the cost of hospitality training for new employees. Also, due to the nature of jobs in the hospitality industry (unsociable hours etc), consideration should be given to the provision of childcare facilities so that access to childcare is not a barrier to employment. This would also ensure that objectives set out in London Plan policies 3B.1 (Developing London’s Economy) and 3B.11 (Improving Employment Opportunities for Londoners) are met.

66 The Council should ensure that the A1/A2/A3/A4/B1 floor space is as flexible as possible, in line with London Plan policy 3B.1 (Developing London’s Economy) so that a range of workspaces of different types, sizes and costs are provided in order to meet the needs of different sectors of the economy. Jobs within these uses should be advertised locally so that local residents can benefit from the development.

Local planning authority’s position

67 The local planning authority’s position is not known at this time.

Legal considerations

68 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. 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

69 There are no financial considerations at this stage.

Conclusion

70 London Plan policies on tourism, mixed use development, tourism, employment, urban design, access and inclusive design, transport, climate change adaptation and mitigation are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:
• Urban design: The proposal is broadly compliant with London Plan policy 4B.1, however further information must be submitted to demonstrate that the ground floor spaces at the rear of the building will contribute to safe, secure and sustainable environment, that the access arrangements for residential and hotel use ensure the proposal is accessible and usable, and that the proposal will be convenient and welcoming with no disabling barriers.

• Access and inclusive design: The proposal is broadly compliant with London Plan policy 3A.5, however further information must be submitted to demonstrate that all public and landscaped space is designed to be fully inclusive for all, and that the internal access arrangements are satisfactory.

• Climate change adaptation: The proposal currently does not comply with London Plan policies 4A.1, 4A.3, 4A.4, 4A.6 and 4A.7. In devising the energy strategy the applicant has not followed the energy hierarchy set out in Policy 4.A1, and as such the proposals must be revisited to consider the incorporation of combined heat and power and the appropriate renewable energy to complement that technology, to ensure the development will make the fullest contribution to the adaptation to climate change.

• Climate change mitigation: The proposal does not meet the highest standards of sustainable design and construction, and fails to incorporate green roofs, strategies to improve water efficiency or drainage issues, and therefore does not comply with London Plan policies 4A.9, 4A.11, 4A.14, or 4A.16.

• Transport: Insufficient information has been provided to assess expected travel demand. The proposal does not incorporate blue badge car parking, and the travel plan is not compliant with London Plan policies. Further information pertaining to the cycle parking is needed, along with the developer’s commitment to developing servicing management and construction management plans, and appropriate coach accommodation measures are required. The proposed planning obligations do not account for contributions to public transport or for coach pick up / set down facilities. The proposal does not therefore currently comply with London Plan policies 3C.2, 3C.22 or 3C.23.

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

72 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: Revisions to the design and layout to ensure that the ground floor commercial uses at the rear of the building will contribute to safe, secure and sustainable environment. Provision of further information to demonstrate that the access arrangements for residential and hotel use are compatible and that the proposal will be convenient and welcoming with no disabling barriers.

• Access and inclusive design: Further information must be submitted to demonstrate that all public and landscaped space and pathways are designed to be fully inclusive for all, and that the internal access arrangements for disabled guests exceed minimum requirements.

• Climate change adaptation: Revisions to the energy strategy to follow the energy hierarchy set out in London Plan policy 4.A1 to consider the incorporation of combined heat and power and the appropriate renewable energy to complement that technology.

• Climate change mitigation: Demonstrate that the proposal meets the highest standards of sustainable design and construction, including the use of green roofs and addressing water efficiency and sustainable urban drainage issues.
Transport: Undertake a robust trip rate and modal split assessment, incorporate off-street blue badge parking, provide further information relating to cycle parking, arrangements for coach pickup/set down, revise the travel plan and review the section 106 obligations.

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