



Kensington Forum

QUEENSGATE
INVESTMENTS

Rockwell

AVISON
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Kensington Forum Hotel – London

PLANNING STATEMENT ADDENDUM | JULY 2020



Planning Statement Addendum

Kensington Forum Hotel

July 2020

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For and on behalf of Avison Young (UK) Limited

Please note that Avison Young was known as GVA at the time of the original submission in June 2018.

1. Introduction

- 1.1 This Planning Statement Addendum is submitted in support of the redevelopment proposals detailed within the full Planning Application (Reference GLA/4266 & PP/18/03461) submitted to the Royal Borough of Kensington and Chelsea ('RBKC') on 18th June 2018, amended on 1st May 2019 (the 'Application', the 'Scheme') and subsequently approved by the Mayor of London on 21st June 2019 following a direction (under the powers conferred by Section 2A of the 1990 Act) that he would act as the local planning authority for the purposes of determining the planning application.
- 1.2 The development is for the mixed use, hotel-led redevelopment of the Kensington Forum Hotel, 97 – 109 Cromwell Road, London, SW7 4DN (the 'Application Site') in RBKC. The Applicant is Queensgate Bow UK Holdco Limited. The redevelopment involves the demolition of an existing large scale hotel building which is in need of a significant upgrade to secure its long term viable use.
- 1.3 Since the decision to approve the planning application was taken by the Mayor, RBKC initiated a Judicial Review (JR) challenge of the decision. The grounds for challenge were limited to issues associated with the procedure followed in respect of the Secretary of State's ability to Call In the application. RBKC did not raise any legal issues in relation to any aspect of the Stage 3 Hearing Report. Prior to a formal JR hearing, the Greater London Authority (GLA) consented to judgement and the decision was quashed.
- 1.4 As a result, there is a procedural requirement for a second Stage 3 Hearing and redetermination by the Mayor or Deputy Mayor. The Applicant is requested to update the submission to take account of any recent changes to adopted planning policy and emerging planning policy.
- 1.5 No changes to the Scheme are proposed. The Scheme was judged to comply with adopted and emerging planning policies by GLA officers and determined on this basis by the Mayor in June 2019.
- 1.6 Since the Stage 3 Hearing, there have been changes to the relevant planning policy context for the Scheme. In short, RBKC have adopted their Local Plan following a partial review. This does not materially alter the previously adopted policies relevant to the determination of this application. The Draft London Plan has advanced another stage following Examination and continues to be a material consideration in planning decisions, though the London Plan (2016) continues to be adopted version.
- 1.7 The Application remains in accordance with the relevant national, strategic and local planning policy, supplementary planning guidance taken as a whole. This Statement explains why the limited changes to the planning policy context for consideration of the Scheme since then do not justify a departure from that planning judgement.
- 1.8 This Statement identifies those limited areas of substantive change and their relevance to the consideration of the Scheme. This Statement should be read in conjunction with the Planning Statement dated June 2018 and all other supporting application documents and drawings (see below). Together, they explain the planning rationale for the approval of the Application.

- 1.9 In terms of the content of this document, it does not seek to repeat sections of the previously submitted information which are already well documented within the supporting application documents and subsequent 2019 RBKC Committee Report and 2019 GLA Stage 3 Hearing Report.
- 1.10 In addition to this Planning Statement Addendum, the following documents are submitted on behalf of the Applicant to respond to emerging draft London Plan policies and assist the GLA officers make their re-assessment which will inform the Mayor's consideration of the development:
- Environmental Statement Addendum (July 2020), including:
 - Volume 1: ES Addendum Main Report
 - Volume 2: Townscape, Visual and Heritage Impact Assessment Addendum (TVHIAA)
 - Volume 3: Technical Appendices Addendum
 - Non Technical Summary Addendum
 - Transport Assessment Addendum (2020)
 - Fire Safety Statement
 - Whole Life Cycle Carbon Assessment
 - Circular Economy Statement
 - Energy Strategy Justification - Technical Note
- 1.11 It is understood that the GLA is responsible for the drafting of the S.106 Agreement in advance of the Hearing which is in the interests of best practice. The draft will be based on the previously signed S.106 Agreement and will be consulted upon with RBKC legal department prior to the Hearing.
- 1.12 In addition to this Statement and the documents noted above, the other Application documents remain as follows:

June 2018 Submission

- Site Location Plan
- Environmental Statement Non-Technical Summary
- Environmental Statement Volume I (Main Report)
- Environmental Statement Volume II (Townscape, Visual and Heritage Impact Assessment)
- Environmental Statement Volume III (Technical Appendices)
- Design and Access Statement

- Planning Statement
- Energy Statement
- Sustainability Statement
- Statement of Community Involvement
- Hotel Market Overview Report
- Basement Impact Assessment
- S.106 Obligations Statement
- Arboriculture Assessment

April 2019 Submission (documents dated April 2019 unless otherwise stated)

- Cover Letter
- Revised Planning Application Form and Revised CIL Form
- Existing and Proposed Drawings
- Environmental Statement Addendum Non-Technical Summary
- Environmental Statement Addendum Volume I (Main Report)
- Environmental Statement Addendum Volume II (Townscape, Visual and Heritage Impact Assessment)
- Environmental Statement Addendum Volume III (Technical Appendices)
- Design and Access Statement Addendum
- Transport Assessment
- Waste Management Strategy
- Internal Daylight Assessment Addendum
- Energy Statement Addendum
- Basement Construction Method Statement Letter of Conformity
- Flood Risk Assessment Letter of Conformity
- Building Heights SPD Response Summary
- Open Space Management Plan (June 2019)

2. Planning Benefits

2.1 The Scheme considered and approved by the Mayor of London on 21st June 2019 offers the following planning benefits:

- Provision of 62 genuinely affordable homes (with 100% at London Affordable Rent levels in an area of significant housing need to directly serve people on the Council's 3,400 long waiting list (and where over 70% of those the Borough houses in temporary accommodation are found homes beyond its boundary);
- Provision of world class visitor accommodation and conferencing facilities totalling 1,089 bedrooms to support London's continued role as a global city and centre for business. This responds to the draft London Plan's calls for the visitor economy to be strengthened and infrastructure enhanced;
- Creation of a 2702 sqm Garden Square of the highest quality, more than doubling the existing accessible green space, restoring it in a traditional form which will be publicly accessible for everybody to enjoy. This replaces a fragmented, poor quality and low-functioning space (created in 1971) with the only publicly accessible green space within 1km walking distance of the site. Arrangements have been made for its long-term stewardship to be managed in consultation with representatives of the local community through an Open Space Management Plan agreed in collaboration with local residents' groups and the Council.
- Creation of a building of high visual and architectural quality that re-engages with the neighbouring streets and better responds to its local urban context in its layout, architectural language and use of traditional high quality materials in contrast to the existing building (costing £300m to build, designed to last at least 150 years using materials such as Portland Stone and Bronze).
- Creation of up to 617 net additional jobs above those currently on site (to over 800 in total, a 300% increase) and approximately 600 construction jobs that will provide a range of employment opportunities to local people in an area where there is growing inequality with almost £1.4 million to training initiatives to ensure jobs are available to those most in need;
- Public realm upgrades between the Site and Gloucester Road Station along surrounding streets to improve quality and legibility (with over £2.8 million put towards enhancement of the streets beyond the application site); and

- Retention of all existing London Plane trees, alongside the planting of 29 new trees and the introduction of 140 new plant species to enhance ecology and biodiversity.

2.2 These Scheme benefits were judged to have 'very significant weight' such as to outweigh the 'less than substantial harm' identified to the significance of heritage assets for the purposes of paragraph 196 of the NPPF and the relevant statutory heritage duties.

2.3 These benefits have not changed. The current economic crisis triggered by COVID-19 underlines the importance of these benefits to investment in London as a key cultural, leisure and economic centre and are considered to have even greater importance and value.

3. Application Proposals

Background

- 3.1 The application proposals are a result of an extensive and collaborative process of engagement with the local community, RBKC and the GLA which have significantly evolved over the lifetime of the project which started in the summer of 2016. The design is fully coordinated with input from extensive number of specialist consultants.
- 3.2 The hotel is in need of a significant upgrade to secure its long-term future, which given the constrained nature of the existing building and site layout, is best achieved through comprehensive redevelopment.
- 3.3 The Applicant's brief for the site included the following key objectives;
- To improve the overall quality of the external environment both for the neighbourhood and the setting of the hotel by reinstating the Garden Square as a publicly accessible amenity space.
 - To provide a higher-rated world class hotel on the site with a more diverse range of room types to suit the demand in the London market.
 - To improve the customer experience of the entire hotel, in particular it's sense of arrival.
 - To improve the front of house facilities for the hotel.
 - Increase the overall quantum of hotel accommodation on the site.
 - Improve the balance of land use by re-introducing homes on the site.
 - Create a building of architectural quality with a lasting legacy to this area of London.
- 3.4 As highlighted above, the detailed application was submitted in June 2018 which followed an 18 month period of consultation and engagement. This process is documented in detail within the accompanying Design and Access Statement and Statement of Community Involvement.
- 3.5 The application proposals were Recommended for Approval by RBKC planning officers, but the proposals were refused by Members of the Planning Committee on 27th September 2018 for the reasons provided below.
1. *The height and massing of the proposed development, including an additional tower, would cause less than substantial harm to the character and appearance of nearby heritage assets, especially in nearby views. The elevational treatments would be of an insufficiently high design quality to have a wholly positive impact on the character and quality of the townscape, and the relevant tests for tall buildings in the Building Height SPD have not been undertaken. The benefits of the development would not outweigh these harms. The proposal is, therefore, contrary to Consolidated Local Plan policies CL1, CL2, CL3, CL4, CL11, & CL12 and the Building Height (in the Royal Borough) SPD.*

2. *In the absence of agreed Section 106 obligations, and provisions under section 16 of the General Powers Act, which would secure the necessary mitigation measures and infrastructure which are necessary to make the development acceptable, the proposal would be contrary to policies of the Consolidated Local Plan, in particular policies C1, CT1, CR1, CR4, CR5, CR6, CE1, CE5, and CH2 and the London Plan.*

- 3.6 On 5th November 2018, the Mayor issued a Direction under article 7 of the Town and Country Planning (Mayor of London) Order 2008 that he would take over the application and act as the Local Planning Authority for the purposes of determining the planning application.
- 3.7 On 14th December 2018, the Council subsequently filed a claim for Judicial Review, seeking to quash the Mayor's Direction on the basis that the GLA had not accurately reported Council's performance against the London Plan net housing target over the previous 5 years.
- 3.8 On 19th March 2019 the Mayor filed a Consent Order agreeing that the Direction should be quashed on this matter of detail, and this was approved by the High Court on 16th April 2019. Under the terms of the Order, the Mayor was granted another 14 days to decide whether to recover the application for his own determination.
- 3.9 On 23rd April 2019 the Mayor issued a new Direction to confirm that he will act as the local planning authority for the purposes of determining the application, contending that the omission of certain figures in the officer's report did not affect his overall conclusion and he should exercise his powers to scrutinise the application in further detail. This triggered the submission of the proposed amendments that were prepared during the intervening period by the Applicant.

May 2019 Amendments

- 3.10 The application proposals were amended on 1st May 2019 following the Direction of the Mayor of London on 23rd April 2019. The amendments included the following:
- Increase of homes by 16, from 46 to 62 homes;
 - All homes offered as affordable housing in the London Affordable Rented tenure;
 - Creation of two additional recessed storeys on top of the 7 storey podium to accommodate the additional affordable homes;
 - Minor external alterations to the residential block, including expanded bay windows, additional balconies and set-back roof terraces at the upper levels;
 - Internal reconfigurations to the homes;
 - Ground floor residential lobbies consolidated into one entrance space and the cycle store increased in size; and
 - The cycle store and refuse store in the basement level B1 were amended to take account of the increase number of homes.
- 3.11 The amendments further enhanced the planning benefits of the Scheme. The additional affordable homes are considered to be a substantial planning benefit and, taken with the other

Scheme benefits as a whole, significantly outweigh the 'less than substantial harm' identified by RBKC and the GLA to the setting and significance of nearby heritage assets.

Summary of Current Application Proposals

3.12 For convenience, a summary of the application proposals is provided in this section of the Statement. The current description of development is as follows:

"Comprehensive redevelopment and erection of a part 30, part 22 and part 9 storey building comprising hotel bedrooms and serviced apartments (Class C1) with ancillary bar, restaurants, conferencing and dining areas, leisure facilities and back of house areas; residential accommodation (Class C3); with associated basement, energy centre, plant, car parking, cycle parking, refuse stores, servicing areas; associated highway works and creation of new publicly accessible open space with associated hard and soft landscaping."

3.13 The proposal is for the demolition of the existing 29 storey building on the site (comprising 906 hotel bedrooms) and its redevelopment for 749 hotel bedrooms, 340 serviced apartments (1,089 in total), 62 affordable rented homes and creating a new public open space. The hotel and serviced apartments will be supported by ancillary functions, including business and conferencing facilities, restaurants/bars and and leisure facilities that will be accessible to local community.

3.14 The new floorspace will be provided within three linked blocks located on the eastern half of the Site. A garden square will be located on the western half of the Site and an arrival square will be positioned at its north-west corner, together occupying the rest of the site's urban block.

3.15 A rectangular 'podium' block of 7 storeys in height would be located on the eastern part of the site, extending for almost its full length on a north-south alignment. At the south-eastern corner, the podium building steps up in height to 9 storeys where there are 2 recessed attic storeys of residential accommodation. The development has been set-back from the back of pavement along Courtfield Road to create a landscaped garden for use by the new residents. This is in addition to a communal garden at roof level.

3.16 Two taller elements would be located above the podium block and slightly off-set from it, such that they would slightly cantilever its eastern frontage; one block of 22 storeys would be located centrally within the base block, and one block of 30 storeys would be located at its northern end on the Cromwell Road frontage. The residential element of the development would occupy the southern end of the podium fronting onto Courtfield Road. The hotel and serviced apartment uses would occupy the rest of this block and the two taller elements, with the central component occupied by serviced apartments, and the northern block occupied by hotel accommodation.

3.17 The proposed basement is located within the footprint of the existing basement to minimise any potential impact to tree roots and utility services as well as the underground tube line exclusion zone which runs through the north eastern corner of the site. There are two levels which are split into both front of house and back of house hotel accommodation. The lower levels contain hotel conference space, a gym, back of house facilities (kitchens, linen stores, hotel offices etc) as well as parking, refuse storage, an energy centre and associated plant rooms.

- 3.18 Restaurants are located at ground floor and mezzanine levels accessed directly from the lobby. A business centre serving the conferencing space is located at first floor level which has a direct circulation link to the lobby.
- 3.19 The garden square would comprise lawned areas, paths and planting including trees and measure 2,702 sqm in size. The north-western pick-up/drop-off area is not defined as part of the garden square would be hard landscaped. A wall with an integrated water feature and shelter would define the boundary between the two areas.
- 3.20 Full design details of the Proposed Development are provided in the accompanying Design and Access Statement and Addendum and planning application drawings prepared by SimpsonHaugh and Exterior Architecture.
- 3.21 The quantum of proposed uses in the development are set out in Table 3.1 below:

Table 3.1 – Proposed Floorspace

Use Class	Proposed Floorspace	
	GEA (sq.m)	GIA (sq.m)
Hotel (Use Class C1)	21, 531	20,282
Serviced Apartments (Use Class C1)	13,026	12,329
Ancillary Hotel Uses (Use Class C1)	40,250	38,764
Residential (Use Class C3)	5,282	5,171
Ancillary Residential (Use Class (C3)	2,346	2,264
Total	82,435	78,810

Hotel and Serviced Apartments

- 3.22 The Proposed Development will deliver a 749 bedroom hotel and 340 serviced apartments (Class C1). Serviced apartments are recognised by the London Plan as having an important role in providing accommodation for visitors to London.
- 3.23 The hotel offer includes conference, gym and restaurant/bar facilities that are commensurate the scale and nature of a superior quality hotel. The hotel receptions and restaurant will be at ground floor and provide active frontages. The hotel rooms are provided at different sizes as demonstrated below in Table 3.2.

Table 3.2 – Proposed Mix of Hotel Accommodation

Unit Type	Number of Units	Total (%)
Standard	434	57.9%

Superior	156	20.8%
Deluxe	122	16.3%
Suite	35	4.7%
Penthouse	2	0.3%
Total	749	100%

- 3.24 Whilst there is a net reduction in hotel bedrooms on the Site, the Proposed Development includes 340 serviced apartments to be offered on short term lets, thereby increasing the quantum of visitor accommodation overall. The serviced apartments are provided at different sizes as demonstrated below in Table 3.3:

Table 3.3 – Proposed Mix of Serviced Apartment Accommodation

Unit Type	Number of Units	Total (%)
Studio	70	20.6%
1 Bed	201	59.1%
2 Bed	67	19.7%
Penthouse	2	0.6%
Total	340	100%

- 3.25 10% of the hotel guest rooms and serviced apartments are allocated as wheelchair rooms and are sized and planned accordingly. This is in accordance with planning policy objectives.
- 3.26 The existing hotel currently employs circa 200 people. The Proposed Development will provide between 443 to 817 (gross) FTE jobs. Taking into consideration existing jobs that would be lost, the Proposed Development would deliver a net increase of between 243 and 617 FTE jobs, thereby doubling and potentially tripling the number of jobs on-site.

Residential

- 3.27 The Proposed Development delivers a range and mix of unit types and sizes exclusively for Social Rent provided at London Affordable Rent levels and is therefore a 100% affordable housing scheme. All the proposed units will provide a high quality residential environment which meet and exceed the required standards set out by the GLA Housing SPG.
- 3.28 Table 3.4 below includes details of the proposed residential accommodation.

Table 3.4 – Proposed Mix of Residential Accommodation

Unit Type	Number of Units	Total (%)
Studio	6	10%
1 Bed (2p)	19	31%
2 Bed (4p)	26	42%
3 Bed (4-6p)	11	18%
Total	62	100%

Garden Square Proposals

- 3.29 The garden square is proposed as the green heart of the redeveloped site. In the current site condition, the garden square is fragmented, inaccessible and of poor quality. The garden square is to be re-established to broadly reflect the layout of the historic square before 1971. Framed by the street on two sides, and by building on the other two, the garden square will be restored to reflect its historic position and create a connection between past and future uses of the site. The existing garden square measures 2,658m², as surveyed by a heritage expert. The size of the new garden square will be 2,702m², a larger, consolidated and significantly higher quality, more accessible and inclusive open green space for everyone to enjoy.
- 3.30 Community engagement and activation of the site is imperative to the success of green space. The garden square will foster a local spirit, through access, management and further interaction with the immediate and wider community. The garden square will be a place for people to gather, socialise, meet, enjoy, rest and relax.
- 3.31 To that end, an Open Space Management Plan is secured by the Section 106 Agreement and key principles have been agreed with the Council and representatives of local residents' groups to facilitate the long-term stewardship and management of garden in collaboration with the local community.
- 3.32 Building on the existing vegetation, the garden square is to offer increased site ecology and biodiversity through the development of a considered planting palette that offers additional habitats, whilst providing a green space for socialising. Balancing the needs of fauna and people will be achieved throughout the garden square.
- 3.33 Pedestrian circulation around the periphery of the site is retained and kept clear of street furniture. The surface treatment is upgraded to the highest adoptable standards for the Borough and this surface is extended into the site to blend the site into the surrounding context. Pedestrian access is enhanced within the site through a public path that runs north/south between the building and the garden square.
- 3.34 The path provides an entrance point to the garden square whilst allowing greater permeability of the public space through the block. A low boundary 1.2m high hedge to the garden square and views from within the building ensures passive surveillance of the path.

- 3.35 A formal perimeter path and informal sweeping paths through the lawn and ornamental shrub planting provides pedestrian circulation within the garden square. The garden square is accessible via gated access in three locations, stepped access from Ashburn Gardens and Courtfield Road and an accessible entrance from the path adjacent to the building. The garden square will be publicly accessible to all and security will be ensured as the garden will be locked and access restricted from dusk to dawn. The northern boundary will be contained by a sculptural wall and canopy to protect the garden from Cromwell Road and provide seating opportunities under the cover of the cantilevered canopy.

Wider Public Realm Strategy

- 3.36 The existing wider context for the site poses challenges and offers opportunities in achieving the kind of sense of place, arrival and destination that is intended to be achieved as part of the overall design concept.
- 3.37 The proposed development will achieve a step change in design quality, legibility and coherence, in line with the overall objective of delivering outstanding design quality which is required for all developments in RBKC, particularly tall buildings.
- 3.38 However, the poor condition of the existing streetscape on the key approach routes from Gloucester Road tube station to the site represents a constraint to achieving the level of wider enhancement and integration consistent with the overall design vision and scheme principles.
- 3.39 Gloucester Road currently provides a relatively limited sense of arrival upon exiting from the London Underground station. The station will continue to be a significant source of public trips to the Site and improving the legibility and overall quality of the key routes from it will make an important contribution to the immediate area.
- 3.40 In the interests of creating a cohesive and legible environment for pedestrians walking to and from the station, it is recommended that landscaping improvements are undertaken to enhance this experience to match the quality that will be created on the site itself. This enhancement would not only contribute to the establishment of a sense of place, but also contribute to a stronger sense of destination.
- 3.41 Given the fact that the site comprises an entire urban block, it is considered that the scale of the proposal and the inclusion of a garden square, contributes to the creation of a destination in its own right. There is an inherent physical relationship with the station that forms part of its setting and sense of place. This is something which, if knitted into the townscape of the surrounding area, particularly at Gloucester Road, could provide a comprehensive and unified character in public realm terms, substantially enhancing wayfinding, legibility and the pedestrian experience. We have suggested some design features that could achieve this in the accompanying Wider Public Realm Strategy which is appended to the Design and Access Statement.
- 3.42 The identified opportunities can be quantified and costed and provided as a financial contribution that will be secured through a Section 106 Agreement (which was the case previously). The hard and soft landscaping proposals are suggestions at this stage and are shown indicatively on the accompanying Illustrative Landscape Masterplan.

4. Planning Policy Context

Policy Framework

- 4.1 In accordance with s.38(6) of the Planning and Compulsory Purchase Act (2004), the Application should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 Since the previous Stage 3 Hearing in June 2019, parts of the adopted Development Plan have been updated or emerging policy has progressed a further stage.
- 4.3 The Royal Borough of Kensington adopted the Local Plan Partial Review (LPPR) on 11th September 2019, superseding the Consolidated Local Plan (2015) and UDP Policies that was in place at the time of the previous decision. The Plan is a Partial Review of the Publication Policies dated February 2017. It should be noted that because it is 'review', many of the policies have not fundamentally changed and in fact, the majority of the previous CLP policies are replicated in the current revised version which retain the same policy reference.
- 4.4 The focus of the revised Local Plan is to increase the rate of delivery of new homes, targeting over 4,400 homes to be built over the next five years. Following the Grenfell tragedy, the Council has made a commitment to build more affordable housing in the borough with one in three planned to be affordable homes, with an objective to expand opportunities, reduce inequalities, and provide more diversity in the homes that are delivered. New employment policies are included which recognise the need to optimise employment zones to include housing but also to improve their employment offer. It also includes a more flexible approach to maintaining the vitality of town centres and the retail cores of Kensington and Chelsea.
- 4.5 At the time of the 2019 Stage 3 Hearing, the policies contained within previous draft version of the Local Plan Partial Review Main Modifications (July 2018) were a material planning consideration in making the decision and the Mayor gave weight to these policies. At the regional level, the London Plan (2016) remains the adopted strategic policy document. At the time of the 2019 Stage 3 Hearing, an EIP had been held on the draft London Plan (2017) with Minor Suggested Changes (2018) and a number of Matters Statements were published covering various topics. The policies contained within the Draft London Plan were a material consideration, with the weight attached reflecting its stage of preparation in accordance with NPPF paragraph 48.
- 4.6 The Draft London Plan has advanced another stage since the Stage 3 Hearing and continues to be a material consideration in planning decisions. The Intend to Publish version of on the draft New London Plan was issued to the Secretary of State on 9th December 2019 for approval.
- 4.7 On 13th March 2020, the Secretary of State wrote to the Mayor setting out his considerations which included a number of directions to change policies within the Plan. The Mayor is currently in the process of formulating some proposed amendments to the directions to ensure they are workable in practice and will seek to remove policy ambiguities. Policies that are not subject to a direction by the Secretary of State are deemed to carry significant weight in accordance with NPPF paragraph 48. It is anticipated that the Draft London Plan will be adopted by the end of the year.

- 4.8 At the national level, the National Planning Policy Framework (NPPF) is also a material planning consideration and this was updated on 19 February 2019. Its contents were duly considered by the GLA at the previous Hearing in respect to the application proposals and there have been no policy changes since that time. There has also been no progress with the Courtfield Neighbourhood Plan.
- 4.9 The differences between the Development Plan documents are summarised in the table below for ease of reference:

Statutory Development Plan	June 2019	July 2020
Adopted Regional Planning Policy	London Plan (2016)	London Plan (2016)
Emerging Regional Planning Policy	Draft London Plan (2017) Minor Suggested Changes (13 August 2018)	Intend to Publish version of on the draft New London Plan (9 December 2019)
Adopted Local Planning Policy	RBKC Consolidated Local Plan (2015) and Extant UDP Policies	RBKC Local Plan Partial Review (11 September 2019)
Emerging Local Planning Policy	RBKC Local Plan Partial Review Main Modifications - July 2018 (LPPR)	N/A

- 4.10 We also note that RBKC have published the Planning Obligations SPD in September 2019. It highlights in cases where the Mayor calls in applications for the local planning authority for determination, the function of agreeing a planning obligation is the responsibility of the Mayor. The Mayor is required under the Town and Country Planning (Mayor of London) Order (2008) to consult the Council before agreeing any planning obligation.

5. Planning Assessment

- 5.1 This section assesses the development proposals against the currently adopted Development Plan and other material considerations, focussing on the topic areas in relation to which policy has materially changed since the June 2019 Stage 3 Hearing.
- 5.2 Key planning considerations such as principle of development and affordable housing are revisited for completeness. The topics discussed in this section of the Statement are as follows:
- Principle of Development
 - Affordable Housing and Unit Mix
 - Design and Heritage
 - Children's Playspace
 - Energy and Sustainability
 - Fire Strategy
- 5.3 There are other topics which are addressed within the separate Environmental Statement Addendum (prepared by Trium) and these include:
- Townscape, Visual and Heritage Impact
 - Socio-Economics
 - Traffic and Transport
 - Noise and Vibration
 - Air Quality
 - Daylight, Sunlight, Overshadowing and Solar Glare
 - Wind Microclimate
 - Ecology

Principle of Development

- 5.4 Since the 2019 Stage 3 Hearing, there has been no significant change to relevant Development Plan policies in respect of the principle of development or the proposed mix of uses.

Visitor Accommodation

- 5.5 In summary, the scheme is hotel-led and the principle of hotel use on the site is already established through its current use and is situated in location where intensification is supported on the basis that the site has a high PTAL rating of 6a (Excellent) in close proximity to Gloucester Road Station and internationally significant tourist attractions in central London. The previous Stage 3 Hearing confirmed that this is appropriate location for new visitor accommodation, as well as conferencing facilities.
- 5.6 In accordance with London Plan policy 4.5 and Draft London Plan policy E10 the proposals seek to enhance the provision of visitor accommodation in terms of both quantity and quality. There

will be an additional 183 rooms compared to the existing building with a much greater range of room sizes and types on offer to cater for customer choice and budget.

- 5.7 At the local level, newly adopted Local Plan Policy CF8 seeks to protect hotels and hotel bedrooms across the borough, strengthening the previous policy position by now also referring to the need to protect the number of bedrooms. Clearly therefore, ensuring that there is no net loss of hotel accommodation (as proposed) is key local priority and, as highlighted from the beginning of this project, the building is reaching the end of its natural life and comprehensive redevelopment is the only viable option in securing the most appropriate long term future for the hotel.
- 5.8 The Local Plan also states that new hotels are supported in sustainable locations with excellent transport links and nearby to major tourist attractions and encourage the upgrading of hotels where this will assist in maintain the vitality of the centre, not result in the loss of any residential accommodation and there will be no material harm to amenity. There is no change to this aspect of the policy from the previous version.
- 5.9 The proposals accord with these policy criteria in all respects (as confirmed by RBKC in their Committee Report) and would make a major contribution to the 2,230 bedrooms per annum that the draft London Plan estimates will be required by 2041.
- 5.10 In addition to the delivery of visitor accommodation, the proposals offer substantial high-quality conferencing and events space, capable of accommodating 1,500 seat conference and 1,200 person seated banquet events. The GLA acknowledge that this would be a high quality and modern facility that would be a significant qualitative and quantitative enhancement on the current conferencing offering and would also be meeting adopted and emerging London Plan policy objective to provide large scale convention space in and around the Central Activities Zone (CAZ) which the site is on the fringe of.
- 5.11 The proposals would contribute towards the overarching London Plan objective of ensuring London remains an internationally competitive and successful city with a strong and diverse economy and retains and extends its global role as a sustainable and competitive centre for business and a world class visitor destination through delivering significant visitor infrastructure to support the Capital's visitor economy.

Residential Accommodation

- 5.12 The London Plan and Local Plan policies regarding the need to optimise land for delivering additional homes (and affordable homes) in London have not changed and proposals which make a valuable contribution to the housing supply are afforded significant weight in decision-making. This is discussed further in the affordable housing section of the assessment.
- 5.13 The redevelopment provides the opportunity to reinstate the residential use and character on the corner of Ashburn Place and Courtfield Road which existed 50 years ago. The reintroduction of this use reflects the residential character on the opposite side of Courtfield Road providing an appropriate contextual response and has the added benefit of replacing the current coach and taxi parking and drop off area for the hotel which is proposed to be relocated to Cromwell Road away from the quieter residential streets. The approach is also consistent with the overarching policy objective to optimise land for a mix of priority uses.

Garden Square

- 5.14 In terms of the garden square proposals, revised Local Plan policies CR5 and CR6 continue to require the protection and enhancement of existing gardens, trees and open spaces, which match the objectives of London Plan Policy 7.8 and draft London Plan policy G4.
- 5.15 The proposal to reinstate the garden square in a form that resembles the original 1890 layout has been an integral driver to the design approach from the outset. The transformation of the existing garden into a publicly accessible garden square, which re-establishes its historic purpose represents a rare and exciting opportunity. The new garden measures 2,702 sqm which is larger in size, but crucially the garden will be substantially more usable and attractive than the existing disparate spaces located around the existing building and offers enormous public realm, urban design, ecological, and community benefits.
- 5.16 As stated by the GLA's Stage 3 Hearing Report in June 2019, the principle of intensifying hotel and residential uses on this site is strongly supported and the hotel-led mixed-use redevelopment of the site is compliant with the NPPF and consistent with the aims of strategic and local planning policy, including London Plan Policies 3.3, 3.16, 4.5, 4.12 and 7.18; draft London Plan Policies E10, E11, GG1, GG2, G4 and H1; and Local Plan Policies CH1, CF8 and CR5.

Affordable Housing and Unit Mix

- 5.17 The proposed development would deliver 62 (100%) genuinely affordable homes at London Affordable Rent levels in a borough which has consistently failed to meet the targets for overall additional homes and affordable homes, with only 34 affordable homes being granted planning permission between 2015 and 2019.
- 5.18 The policy criteria for assessing affordable housing is not fundamentally different since the previous hearing and the topic of affordable housing was addressed comprehensively within the GLA Stage 3 Hearing Report where the adopted and emerging policies were fully considered. The only material difference now is that the emerging Local Plan Policy CH2 is adopted and supersedes the previous version of the policy and the importance of delivering affordable housing continues to increase.
- 5.19 Policy CH2 requires all developments in excess of 650 sqm or more in gross floorspace (GIA) to provide 35% of all residential floorspace as affordable on-site. The previous policy required 50% of all residential floorspace as affordable housing on-site where more than 1,200 sqm is proposed. The policy is designed to have a renewed emphasis on the provision of affordable units themselves (rather than making financial contributions) and ensures that the policy applies to the total floorspace provided within the scheme, and not only the net increase.
- 5.20 In terms of affordable housing targets for delivery, the GLA have stated that in light of the difficulty of translating the Council's floorspace based policy target into a numerical unit-based target, the absolute strategic target of 40% affordable housing set out in the London Plan is applied to the overall housing target for assessment purposes. This equates to targets of 293 affordable homes per year (based on the London Plan housing target of 733 net additional homes per year) and 195 affordable homes per year (based on the Draft London Plan target of 488 net additional homes per year). The GLA state that the target factors in the predominance of small sites within the borough and other local characteristics.

- 5.21 The GLA reported historic shortfall of delivery between 2014 – 2017 to be 18% of that target (equating to 143 affordable homes). The Council stated in their updated Committee Report (May 2019) that only 34 social rented homes had been granted planning permission since 2015. The monitoring reports for 2018 and 2019 have confirmed that no new affordable homes were either granted permission or completed in these monitoring periods. This suggests that only 10% of the affordable housing target for the borough has been achieved over the last 5 years.
- 5.22 While the targets are being reduced as a result on ongoing monitoring of performance, there would still be a very significant shortfall of affordable housing delivery against the lowered target. Furthermore, the Council's SHMA estimates that the overall net annual need for affordable housing is 1,171 homes per annum. This is significantly in excess of what the Council is capable of delivering and places greater importance on the Council's ability to secure the maximum reasonable amount of affordable housing on all developments.
- 5.23 Clearly there is a chronic under-supply of affordable housing in the borough and this proposal would make a highly significant contribution to address this shortfall. The Scheme alone would provide 43% of what has been delivered within the whole borough over the previous 5 years and it would nearly double the number of social rented homes over the same period. The significance and weight that should be attached to this planning benefit cannot be overstated.
- 5.24 The Scheme is delivering 100% of the most affordable form of affordable housing, Affordable Rent (or Social Rent). Whilst the provision of this tenure is a significant benefit, it differs from the guidance in the London Plan, draft London Plan, the Mayor's Affordable Housing and Viability SPG and Local Plan Policy CH2 tenure split requirements (which seeks a 50/50 split between affordable rent and intermediate products). This approach is welcomed by the Borough and the GLA and has been considered acceptable in policy terms given the pressing need for low cost rented housing in RBKC and the predominance in private housing stock in the local area.
- 5.25 In terms of housing mix, the policies have not changed from what was considered at the Stage 3 Hearing. London Plan Policy 3.8, draft London Plan Policy H12 and the Mayor's Housing SPG promote housing choice in terms of the mix of housing sizes and types, taking account of the housing requirements of diverse groups and the changing roles of different sectors in meeting these. London Plan Policy 3.11 and draft London Plan Policy H12 state that priority should be accorded to the provision of affordable family housing.
- 5.26 Local Plan Policy CH3 seeks a mix which reflects the varying needs of the borough, taking into account the characteristics of the site, and current evidence in relation to housing need. In the Local Plan, it states that the need for different size homes within the affordable sector varies greatly from general housing needs with a significant requirement for 1 and 2 bed homes at 70% of the total need with the remainder split between 3 and 4 beds. Analysis of the Council's Housing Register shows that the Borough's greatest supply shortfall (measured against demand) is for 2-beds, then 3-beds, then 4-beds. The proposed supply of 2-beds and 3-beds, a total of 37 homes, would therefore provide the type of housing the Borough is in most need of. Given the chronic shortage of all types of affordable housing, the provision of this kind of housing will be of high value to the borough.
- 5.27 It should also be noted that 6 homes would be wheelchair accessible, which are equally split across the 1, 2 and 3 bedroom apartments. The Council currently only has 10 wheelchair accessible homes in its entire social housing stock and there are 12 households on the housing register who require this type of home. The proposal would allow 6 households to move out of unsuitable housing that does not meet their specialist needs, so increasing wheelchair

accessible stock by over 50% while halving the current waiting list for this kind of accommodation.

Design and Heritage

- 5.28 In terms of the updated 2019 Local Plan, there are no alterations to the previously adopted policies in relation to scale, design and heritage, namely CL1, CL2, CL3, CL4, CL11 and CL12. These policies were referenced and considered by the Mayor in the 2019 Stage 3 Hearing Report.
- 5.29 It is in respect to scale, massing and the design quality of the elevational treatments that were highlighted by the planning committee as being reasons for refusal, contrary to the view of their officers who concluded that the design and architecture was of high quality and the scale and massing was acceptable.
- 5.30 A detailed assessment against sieve tests and positive tests criteria for tall buildings has been undertaken and these are detailed in the 2019 Stage 3 Hearing Report. These are not repeated here as there are no changes to consider.
- 5.31 It should be emphasised that the proposed height and massing arrangement was developed through a thorough design-led process in consultation with RBKC with due regard given to the amenity requirements of neighbouring buildings and the setting of neighbouring conservation areas, listed buildings, parks and gardens.
- 5.32 The design approach from the outset has been to create a high quality, calm and ordered façade which visually expresses the function of the building. The use of a limited palette of high quality materials including Portland stone, bronze and brickwork with refined detailing, and the regular gridded nature of the elevations, respond positively to the character and proportions of the surrounding built context. The building's articulation is defined with floor slabs that project in combination with vertically aligned bays in the towers which provide an overall sense of order within the elevations creating a strong expression. The projection of the floor slabs and the angled or inset nature of bays provides visually interesting depth and articulation to the facades.
- 5.33 In terms of heritage, less than substantial harm has been identified to the significance of the heritage assets. Even though that harm is to be given considerable importance and weight, the view was taken by the Mayor that a clear and convincing justification for the Scheme exists and that the harm identified is outweighed by the public benefits the scheme would deliver which are listed in Section 2. These benefits collectively should be given very significant weight in the circumstances of this case.
- 5.34 We are mindful of the recent global pandemic and the potential economic and cultural impacts this will have. In our view, this underlines the importance and value of these benefits to the investment in London as a key cultural, leisure and economic centre. The need for affordable homes and public open space will not change and takes on even greater importance.
- 5.35 In terms of whether jobs creation or demand for visitor accommodation could be affected, it is impossible to say at this moment in time. What we can say is that there is likely to be a significant period of time before the Scheme is implemented and operational (approximately 5 years) so the likelihood is that there would be no change the current forecasts. The attractions of London

are likely to remain in place in the future and there is no basis for saying that the London Plan tourism strategy, or the weight to the commercial benefit of the hotel aspect of the scheme is diminished.

Children's Play Space

- 5.36 The GLA Population Yield Calculator is a tool for estimating population yield from new housing development. The calculator provides users with an indication of the possible number and age of children that could be expected to live in a new housing development of a given bedroom or tenure mix.
- 5.37 The calculator's methodology document was updated in June 2019 and an updated calculator was published in October 2019. This made modifications to the age groups of children's playspace and the child yield figures. The methodology states that the intention of the tool is not to provide a single GLA approved yield figure, but rather to provide estimates which may inform a discussion.
- 5.38 London Plan Policy 3.5 and draft London Plan Policies D4 and D7 set out expectations in relation to quality and design of housing developments, to include public, communal and open spaces. Policy 3.6 of the London Plan and draft London Plan Policy S4 require developments that include housing to make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. Guidance on the application of this policy is set out in the 'Shaping Neighbourhoods: Children and Young People's Play and Informal Recreation SPG'. This sets a benchmark of 10 square metres of useable child play space to be provided per child, with under-five's play space provided on-site as a minimum.
- 5.39 Local Plan policy CR5 (e) requires all major development to provide on-site external play, including under 5s, based on estimated child occupancy.
- 5.40 Under the previous version of the playspace calculator, in use at the time of the 2019 Stage 3 Hearing, the anticipated child yield of the development was 53 children (28 under-5s, 16 in the 5-11 age group and 9 in the over 12 age group); triggering a requirement of 530 sqm of playspace (10 sqm per child in accordance with the GLA Playspace SPG 2012).
- 5.41 The development provides 540 sqm of dedicated playspace on the residents' terrace at level 9 and within residents' garden fronting onto Courtfield Road. Using the latest calculator, a requirement of 547.90sqm is triggered which is 7.90 sqm in excess of what is proposed. It is also understood that these child yield figures are typically rounded down, meaning that the development is forecast to accommodate 54 children and the quantum of playspace is fully met.
- 5.42 If the figure is rounded up to 55 children, this is only a very marginal shortfall. It is not feasible to provide any additional playspace, as the roof level and ground level of the building have already been fully maximised for this purpose. It should also be noted that the policy priority is for the provision of on-site play for children under 5, whereas the scheme is successfully providing play for all age groups within the confines of the development (excluding the garden square).
- 5.43 Furthermore, the scheme is creating a Garden Square comprising 2,702 sqm of improved, useable and accessible green space, with an open lawn, pétanque area, benches and seats. Residents will be able to use the landscaped garden which will be the only publicly accessible

garden within 1000m walk of the site and will be managed in collaboration with local residents as part of the Open Space Management Plan.

- 5.44 It is considered that the children and other residents that occupy these apartments will have a very generous quantum and variety of high quality open space provision on their door-step to enjoy and remains an acceptable component of the scheme. Therefore, on balance, it is considered that the proposals accord with the policy objective to provide on-site external play space for children.

Energy and Sustainability

- 5.45 A separate Technical Note prepared by PSH is submitted in relation to Energy and Sustainability which should be read in conjunction with this section of the report.
- 5.46 The revised Local Plan included no changes to the energy policies that would affect the consideration of the current scheme. The submitted Energy Strategy demonstrated good level of compliance with the adopted London Plan and draft London Plan policies and was previously approved. The Energy Strategy remains in accordance with the requirements of adopted London Plan which continues to be afforded significant weight.
- 5.47 The scheme achieves an overall saving of 46% in carbon emissions for the domestic buildings and 37% for the non-domestic buildings. The carbon dioxide savings exceed the 35% target for non-domestic buildings but did not meet the zero-carbon target for domestic buildings which was proposed to be mitigated with a carbon off-set payment.
- 5.48 The Sustainability Statement proposes that the non-residential components of the development will target a minimum BREEAM rating of 'Excellent' in excess of the RBKC requirement of 'Very Good'. Under the BREEAM New Construction 2014 methodology, the non-domestic areas are currently achieving 11 out of the 12 available credits under the 'Energy consumption and carbon emissions reduction' criteria, significantly exceeding best practice.
- 5.49 In terms of changes to London Plan policies and guidance, we note that the GLA Energy Assessment Guidance was updated, firstly in October 2018 and then subsequently in April 2020. This 2018 version of the guidance was current prior to the hearing in June 2019 and is understood to have been taken into consideration by the GLA, acknowledging that the scheme was designed and submitted prior to its publication.
- 5.50 The Scheme was designed and submitted in accordance the previous version of the GLA guidance "Energy Planning Guidance" (published in 2016). The previous version of the GLA guidance required energy assessments to use the SAP 2012 carbon factors in line with Building Regulations. The updated guidance requires developments to use the new SAP10 carbon factors (current as of January 2019), in order to meet the required carbon reduction targets, unless justification can be provided for using the previous SAP 2012 factors. It should be noted that Building Regulations continue to use the SAP 2012 carbon factors.
- 5.51 The SAP 2012 carbon factors have typically guided developments along a gas-based heating and hot water system, whereas electrical based systems must perform much better to have any chance of meeting the required carbon reductions. However, the SAP 10 carbon factors would favour an electrical based system, such as Air Source Heat Pumps (ASHP).

- 5.52 Item 5.9 of the 2020 GLA guidance states that regardless of which carbon factors are used in the Energy Statement, applications will still be expected to meet GLA's minimum carbon reduction target. As detailed in the Energy Statement, the scheme meets site-wide 35% reduction in carbon emissions, in accordance with the GLA targets when applying the SAP 2012 factors consistent with current Building Regulations Part L, and the guidance at the time of submission.
- 5.53 Appendix 3 of the guidance (April 2020) states that a gas-engine CHP can still be an appropriate energy solution for area-wide heat networks due to the greater electrical efficiencies achievable at a larger scale. The development contains over 1,150 rooms/units and comprises an entire urban block which is justified in terms of scale. The CHP-led heating system proposed in the current Energy Statement also includes spatial provisions to allow for the installation of plate heat exchangers, which will enable the development to connect to a district heating network, should one become available in the future (although not at the present time).
- 5.54 The proposed scheme split of hotel, serviced apartments and residential units (not to mention the large-scale conference and event space) all have a significant and constant annual electrical and hot water demand which provides an ideal baseload for CHP technology all year-round. This is true of both Part L assessments in which the hot water demand accounts for over 75% of the energy demand of the hotel, and hot water and heating account for around 65% of the residential carbon emissions. The proposed use of a CHP heating system is therefore justified.
- 5.55 The current strategy will also comply with Item 5.8 of the 2020 GLA guidance by ensuring that air quality impact is minimised, for example through the selection of a lower emission unit. The NO_x emissions of the proposed CHP system are declared at <50mg/Nm³. The stated NO_x emissions are relatively low for CHP technology and have are not considered to pose significant risk to local air quality, as reviewed in the Environmental Impact Assessment submitted in the original planning application. Annual maintenance of the CHP will ensure that the NO_x emissions continue to comply with these limits.
- 5.56 The application is demonstrated to exceed the GLA's minimum 35% site wide reduction in carbon emissions, and is therefore in accordance with current London Plan Policy 5.2 (Minimising carbon dioxide emissions) and Draft London Plan Policy SI 3 (Energy Infrastructure) parts c and d. The scheme is also demonstrated to be in accordance with the GLA's Energy Assessment guidance at time of application.
- 5.57 We would highlight that if the SAP 10 carbon factors were applied at this stage of the determination process, this would necessitate starting from the first principles of design from both a MEP and energy/sustainability perspective and would require a redesign of the entire domestic hot water generation and heating strategy, most likely favouring ASHP. This would have numerous design and architectural implications such as redesigning the layout and size of the plant rooms within the basement and making provision for water storage, replanning the roof spaces to include plant rooms which would reduce the size of the amenity spaces and playspace at that level and be more visible, the internal space planning of the apartments would need change, additional plant space would be required within every level of the building with new risers incorporated which will impact floorplates and potentially the number of units. There are also parts of the façade that would require re-working.

- 5.58 This would also be the case for the 15% carbon reduction target for the Be Lean stage of the hierarchy which is introduced in the Draft London Plan. The 'Be Lean' stage relates to passive design and energy efficiency measures that can be implemented to reduce the primary energy demand for the development. The current design achieves 9% and 11% for the domestic and non-domestic demises respectively (under the SAP 2012 figures) and falls only marginally short of this target, although largely in part due to the significant proportion of carbon emissions being associated with systems that cannot be addressed within the 'Be Lean' section. To meet the new 'Be Lean' targets under SAP 10 carbon factors, further passive design and energy efficiency improvements would be required, and this would result in fundamental architectural changes to the scheme's massing and fabric.
- 5.59 It should also be noted that the required reduction is based on the overall carbon emissions of the development, a large proportion of which are attributed to the domestic hot water generation as identified above, leaving a small proportion for which to achieve the 15% reduction using passive and active design measures.
- 5.60 This approach is not considered to be feasible or reasonable at this stage of what has been a protracted planning process since the first Stage 2 decision in November 2018, and the current design has been justified in accordance with the energy guidance and draft policies. It is noted that the energy and sustainability proposals were considered acceptable by the GLA in June 2019 when this guidance was already published. There have been no additional policy changes since this time which would alter this approach and any additional decision-making weight that may now be attributed is not so significant to require a different approach in the circumstances of this application for the reasons given above.
- 5.61 We also note that the target in the Draft London Plan for reducing carbon emissions for non-domestic buildings is increased from 35% above Part L to net zero. The Draft London Plan states at paragraph 9.3.4 that this target will be applied on final publication of the Plan. The document is not yet adopted and is therefore not applicable, meaning that a carbon offset should only apply to the current adopted policy and be based on £60 per tonne.
- 5.62 Again, because this guidance was in place at the time of the previous hearing, it is understood that the way the policy is applied and financial contributions are calculated would remain the same. We note that this is the approach being adopted on the recent determination of other large-scale applications, including the Secretary of State decision on Newcombe House (PP/17/05782) on 25th June 2020 which is located in the Royal Borough.

Fire Strategy

- 5.63 Draft New London Plan Policy D12 (Fire safety) states that in the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety and ensure that they:
- Identify suitably positioned unobstructed outside space for fire appliances to be positioned on and an appropriate for use as an evacuation assembly point
 - Are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures;
 - Are constructed in an appropriate way to minimise the risk of fire spread;

- Provide suitable and convenient means of escape, and associated evacuation strategy for all building users;
 - Develop a robust strategy for evacuation which can be periodically updated and published, which all building users can have confidence in; and
 - Provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.
- 5.64 All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party suitably qualified assessor outlining details related to the buildings construction, emergency access and means of escape, fire alarm systems, passive and active fire safety measures and how fire tender access will be provided for the site.
- 5.65 A Fire Strategy was previously prepared and submitted within the supporting Design and Access Statement. However, the Applicant has agreed to provide an updated Fire Safety Statement for the updated submission given the importance of this issue.
- 5.66 The Fire Safety Statement is produced by JGA and it has been reviewed and approved by a senior chartered fire engineer. JGA are a highly experienced team of specialist fire engineers that have been operating in the UK and Ireland for more than 26 years. The lead engineer on this project is a Chartered Fire Engineer with over 20 years of fire engineering experience.
- 5.67 The Fire Safety Statement outlines the various details related to 1) building construction, 2) means of escape provisions, 3) fire-fighting access within the building, and 4) fire fighting access to the building.
- 5.68 It is highlighted within the Fire Statement that:
- The entire building will be sprinklered;
 - There will be a comprehensive fire alarm system and smoke detection will be provided in all hotel bedrooms and residential apartments;
 - Each tower has two escape stairs which are fire protected within a central core accessed via fire protected corridors with compliant travel distances;
 - The residential apartments will also have two escape stairs with the same provisions;
 - The external walls and facades of the building will be designed using non-combustible materials;
 - Fire vehicles can readily access the building via Cromwell Road, Ashburn Place, and Courtfield Road. Fire vehicles can park within 18 m and in sight of the final exit from the fire fighting stair and lift cores;
 - Fire fighter wayfinding signage will be provided in the building in accordance with latest Building Regulations Guidance;
 - Prior to occupation, a detailed fire safety manual will be produced that provides an explanation of the overall fire safety strategy, the various fire safety systems and the requirements for management in terms of maintenance and evacuation;

- A Fire Risk Assessment will be carried out at the time of occupation and will be reviewed at least annually or whenever there is a change; and
- Any future modifications that comprise building work will be required to be designed and installed to meet the buildings fire strategy and Building Regulations at the time that work is being carried out.

5.69 Based on the above, the development is considered to be acceptable in policy terms and compliant with draft London Plan Policy D12.

6. Conclusions

- 6.1 This Statement explains the background to the Scheme in the context of the redetermination at the forthcoming Stage 3 Hearing.
- 6.2 On behalf of the Applicant, Avison Young have updated the Planning Statement within this Addendum to take account of any recent changes to adopted planning policy and emerging planning policy. The Addendum should be read in conjunction with other supporting documents provided as part this July 2020 submission, the original Planning Statement and all other supporting application documents and drawings listed in Section 1 of the report.
- 6.3 No changes to the Scheme (as amended on 1st May 2019) are proposed. It remains in accordance with the relevant national, strategic and local planning policy, supplementary planning guidance when taken as a whole.
- 6.4 The Scheme was judged to comply with adopted and emerging planning policies by GLA officers and the Mayor in June 2019 and this Statement demonstrates that there is no change which would require or justify a different outcome. The Applicant is complying with a request to provide additional information in respect to a scheme that has had a protracted planning process since November 2018.
- 6.5 The Scheme Benefits highlighted in Section 2 of this Statement are deemed to have very significant weight and consider that they outweigh the 'less than substantial harm' identified to the significance of heritage assets in accordance with paragraph 196 of the NPPF.
- 6.6 There has been no change to this fundamental consideration of the application. The very significant weight to be given to the Scheme benefits is further underlined by the current economic crisis in terms of delivering new affordable homes in areas of critical need and contributing to the creation of new jobs in ways that contribute to the economic and cultural role of London.
- 6.7 As demonstrated this proposal is a sustainable development as defined in the NPPF, accords with the Development Plan for the site and should therefore be approved without delay.

