

Sara Chiong

From: Mark Van't Klooster <[REDACTED]>
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To: Local Plan
Cc: [REDACTED]
Subject: Good Hotel comments on the LBN Reg 19 Local Plan
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Dear Sir or Madam,

We hereby share Good Hotel's comments on the LB Newham Reg 19 Local Plan.

Best Regards

MARK VAN'T KLOOSTER
Community & Project Manager

GOOD GROUP
Western Gateway, Royal Victoria Dock | London E16 1FA | United Kingdom

[REDACTED] | [REDACTED]
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Planning Policy Team
London Borough of Newham
Newham Dockside
1000 Dockside Road
London
E16 2QU

Sent via email to: localplan@newham.gov.uk

Dear Sir or Madam,

Good Hospitality Group comments upon the Newham Reg 19 Local Plan

Entrepreneurial Spirit & Training Programme

The Good Hotel London, part of the Good Hospitality Group, has been successfully operating the Australa hotel vessel in the Royal Victoria Dock since it was floated across in 2016. Good Hotel is a non-dividend social impact business that reinvests profits in to training local people affected by unemployment as well as other International projects such as the schooling of children in Guatemala.

The Good Hotel has been especially successful in harnessing its business for the benefit of the Good Training Programme. From 2017, Good Hotel has in partnership with 'Our Newham Work' provided hundreds of local people with on-the-job training and a start in the hospitality business. As such, it has been featured in Tom Kerridge's BBC2 programme 'The hidden world of hospitality'. Over the years the floating hotel vessel has partnered with many local charities including The Line and has collaborated with the GLA/Newham led Royal Docks team on multiple ventures, including art installations like Dock Lands People.

In addition, the Good Hotel takes pride in making the Western end of the Royal Victoria Dock more accessible and attractive to enjoy for the local community and visitors alike. It is only about 8 years ago that the Corniche upon which it is moored was mostly empty and too windy for visitors to dwell. Since the Good Hotel arrived in London, there are on the

Good Hotel London Ltd
Western Gateway, Royal Victoria Dock
E16 1FA London



Corniche has very much come alive and we are proud to say we have been able to achieve something of a coalition with the likes of RoDMA and ExCeL and Lendlease, in terms of all these players wanting to further bring to life the Corniche and the waters within the Royal Victoria Dock.

Economic Reality and Activating the Water

Water activation in an urban setting rarely happens without some form of impetus, usually commercial. It needs to be enabled and supported through forging strong partnerships combined with entrepreneurial spirit, and economic potential.

Once a place of huge economic importance, the docks had sat practically empty for decades. Back in 2016 when Newham welcomed the floating Good Hotel to moor in the Western part of Royal Victoria Dock, there was limited infrastructure nor safe access onto the water. The hotel vessel has since been functioning as a community hub, providing fully accessible spaces supported by much needed infrastructure and facilities that can now be enjoyed from the water, as well as employing hundreds of local residents over the last 8 years. The siting of the hotel vessel has further helped provide protection from the wind on to the quayside. As such, Good Hotel is proud to have contributed to the ongoing regeneration of Royal Victoria Dock and help create a congenial visitor destination.

If one looks at what else has happened around the Royal Victoria Dock since the Good Hotel arrived, the conclusion is unfortunately very little. We therefore strongly concur with RoDMA in their following analysis:

Water activation in itself is a tenuous commercial model and is rarely successful without food & beverage outlets or other commercial uses attached to encourage footfall. RoDMA require other better commercial offerings, such as residential moorings as well as floating hotels, with food and drink and meeting spaces which would help to cross subsidise and offset the limited income received from just water activities. It is a careful balance. We need to make it economically possible to activate the water, and we need the Local Plan to provide a policy framework that allows for this.

In this respect we note that the London Plan Policy SI17 requires Development Plans to identify opportunities for increasing local distinctiveness and recognise these water spaces as environmental, social and economic assets.

Good Hotel London Ltd
Western Gateway, Royal Victoria Dock
E16 1FA London



If one reads the SI16 and SI17 text integrally, it is very clear that the intention of the London Plan has been to seek a careful balance between:

- *Activating the water, and increasing public access and enjoyment of the water;*
- *While balancing that with other functions, such as navigation;*
- *While identifying some of the general traits of water bodies (such as: it is not land, it has amazing biodiversity credentials etc); yet at the same time;*
- *Also underlining the separate and very different characters that different bodies of water have - i.e. a large river (such as the Thames) is different from a smaller one (eg the Lea) and again from a Canal; and a small pond is obviously very different from a large Dock.*

The latter consideration seems to be overlooked in the Reg 19 Local Plan. This goes to the heart of the need for a bespoke policy approach to the Royal Docks.

The specific and historic nature of a large body of water such as the Royal Docks

It is generally recognised that a large body of water within the urban area of Greater London has untapped potential for placemaking and water activation. It is somehow less recognised, it seems, that such a unique and large body of water needs a unique approach to be activated.

Quite simply put: the Royal Docks are not of a size and scale that is especially easy to enjoy on a humanly pleasant level. They are too large, and all too often devoid of activity. Big bodies of water, which were historically dug like that for good reasons, now have lost their original use, and tend to have become inaccessible (except for open water swimmers and wake boarders) and are prone to be very windy and generally difficult to enjoy for leisure uses, unless that scale can be brought down to a smaller, more human scale.

Clearly, the Eastern parts of the Royal Docks, close to LCY, are less suited for smaller scale visitor enjoyment, as these are right next to City Airport. In areas like these, one could readily visualise innovative uses such as a floating solar farm, and otherwise it is sensible to keep them relatively free and open.



That is not to say the whole 5km stretch of the Royal Docks should be treated in that exact same way. The Royal Victoria Dock, and especially the part from ExCeL / Silvertown to the west, is currently already the most accessible and best used part of the Royal Docks. Key stakeholders such as RoDMA, GLA, ExCeL, Sunborn and ourselves have made efforts to introduce uses which help to break down to vast expanse of the water in some places so as to make them more accessible and enjoyable at a human scale. This is what works well with waterways in places like Amsterdam and Venice where the water ways are much narrower and therefore pleasant to enjoy.

The docks were not built to be empty unused wide bodies of open water. They were dug to facilitate the huge trade that was generated by Imperial Commerce. Historically the water and its edges would have been exceptionally busy with ships and commercial activity thronging the water and the land. Such constantly evolving activity would have brought a human scale to the Docks which is absent now that activity has dissipated. In our view it is the role of the Local Plan to encourage innovative uses of the water and the water's edge so as to reinvigorate the Docks and once more integrate it into the urban environment.

The adopted plan rightly highlights that this does not mean merely extending the land, but rather we suggest that the plan ought to be far more positive so as to encourage innovative and active uses which bridge activities on the water and the land. This might be a range of innovative activities from floating flower markets in Amsterdam to floating saunas in Stockholm. The plan needs to be positive to encourage such uses and innovation and not preclusive unless overly rigorous and restrictive criteria are surmounted.

Planning to use century old docks for 21st century urban life requires imagination and positivity – not an old-fashioned restrictive policy, setting unrealistic hoops.

That is to say: we need certain actions and decisions in the Royal Docks that might appear contrary or paradoxical, when compared to what for example the Regent Canal might call for. But they are very much needed, because water activation does not happen out of itself, and floating things cannot be moored on "sky anchors". We need to make it economically possible to activate the water, and we need the Local Plan to allow for this.

Following the commercial end of the docks activity largely ceased on the water and on the adjoining land. This intermezzo between the 1980s and 2010s when not much happened in the Royal Docks and they become open, windswept and unused has in reality been the anomaly. Not the other way around. Since around 2010, when ExCeL started playing such



an active role in the area, the western part of RVD has become a visitor destination, thanks to the factors such as the cable car, two floating hotels and the wakeboarding centre, and more recently, the Elizabeth Line and City Hall moving in.

In order to further increase the attractiveness and accessibility of the Dock to the whole community, next steps are now needed to help develop the potential of the Royal Docks. These historic dock should not only be preserved (in their empty state since the hustle bustle ended) but rather deserve to be actively used, enhanced and celebrated, with their distinct nautical heritage playing a key role in helping the local community to thrive.

In that light, the planning process for the mooring of the current hotel vessel has laid bare some significant challenges. Whilst planning applications should be judged through a comprehensive planning framework that aligns national policy with local needs, there seems to be a recent trend where policy is being interpreted to promote the 'status quo' in the Docks, to discourage further placemaking on and activation of the water, to keep the Docks empty and protect the artificial 'openness' that has arisen from the decades of the decline and stagnation of the docks. And the language that is currently being proposed for the new Reg 19 Local Plan directly causes a situation within which it is made extremely difficult and unpredictable for the business to invest resources into the docks.

This is not what a positively prepared plan looks like.

We would love to see LBN envisioning a future focused Local Plan which can be a positive tool for the Royal Docks achieving some of the same recognition and status as other notable cities on waterways, who's identity has been redefined and regenerated through activating the water. We refer to Copenhagen, which has brought life to its riverbanks through all sorts of floating boardwalks, lidos and other leisure uses. It is noted that significant investment from the city was made in this area. We also refer to the North side of Amsterdam as well as its IJburg district, where floating houses and leisure uses (including hotels) were introduced to enhance the accessibility and friendliness of otherwise large bodies of water. Further examples can be found in Hamburg and Rotterdam, and closer to home, at the Liverpool Waters.



London Plan SI16 & SI17

Interestingly, the Reg 19 Local Plan seems to seek alignment with the London Plan, more specifically with Policy SI16 and SI17 of the London Plan. However, the way the Reg 19 Local Plan seems to construe the wording and the intention of those policies in the London Plan, is plainly in error.

When one refers to the language in the Annex and one can only conclude that the text of SI16 and SI17 makes it clear that the London Plan seeks to find a careful balance between:

- Activating the water, and increasing public access and enjoyment of the water;
- While balancing that with other uses, such as navigation;
- While underscoring some of the general traits of water bodies (such as: it is not land, it has amazing biodiversity, etc.); yet at the same time;
- Also underscoring the separate and very different characters that different bodies of water have -- i.e. a large river (e.g. the Thames) is different from a smaller one (eg the Lea) and again from a Canal; and a small pond is obviously very different from a large Dock.

To read a "one-size-fits-all" approach to different types of waterbodies in different locations throughout London into the wording of SI16 and SI17 of the London Plan is not appropriate, and to persist in this approach renders the plan obviously unsound.

Conclusion

It should be the goal of the Reg 19 Local Plan to promote a bespoke positive policy for Royal Victoria Dock, which encourages innovation and activation to restore life and activity to the Docks whilst protecting and enhancing the very particular and historically special character of the waters in the Royal Victoria Dock. In that light, it is clear that the Reg 19 Local Plan wording as currently proposed is not in line with the (intention and) wording of the London Plan.

We have seen the comments on the Local Plan submitted by the GLA and are in full agreement with them, in particular the recognition of the different and unique characteristics of the docks compared to other water bodies and the suggestion for policy



wording promoting the unique role of Royal Victoria Dock and the opportunity for water-related activation and uses. We request that LBN update the draft Local Plan to specifically include the draft policy wording recommended by the GLA.

Sincerely,

Signed by email

Signed by email

Marten Dresen

Founder & CEO

Mark van t Klooster

Community & Project Manager

Good Hotel London Ltd
Western Gateway, Royal Victoria Dock
E16 1FA London



ANNEX: London Plan language (with emphasis added):

1. SI 16 (B) Development proposals should protect and **enhance**, where possible, **water-related cultural, educational and community facilities and events, and new facilities should be supported and promoted**, but should take into consideration the protection and **other uses of the waterways**.
2. SI 16 (C) Development proposals that increase the provision of water sport centres and associated new infrastructure will be supported if a deficit in provision has been identified locally, and if the infrastructure **does not negatively impact on navigation or on the protection of the waterway**.
3. SI 16 (D) The provision of new moorings and/or required facilities (such as power, water and waste disposal) should be supported if they are:
 - a. off-line from main navigation routes, in basins or docks, unless there are negative impacts on navigation or on the protection of the waterway (see Policy SI 17)
 - b. appropriately designed including the provision of wash mitigation, where necessary
 - c. managed in a way that respects the character of the waterways.
4. SI 16 (F) Development proposals along waterways should **protect and enhance inclusive public access** to and along the waterway front and explore opportunities for new, extended, improved and inclusive access infrastructure to/from the waterways.
5. Interestingly, in the notes with SI16 of the London Plan, there is extensive discussion of the particular needs and aims along the Thames and the waterways managed by the Canal and River Trust. The Royal Docks unfortunately are not mentioned, though they are of a very specific nature.
6. SI 17 (C) Development proposals should support and improve the protection of the **distinct open character and heritage of waterways** and their settings.
7. SI 17 (D) Development proposals into the waterways, including permanently moored vessels, should generally only be supported for **water-related uses or to support enhancements of water-related uses**.
8. Development proposals along London's canal network, docks, other rivers and water space (such as reservoirs, lakes and ponds) should respect **their local character**, environment and biodiversity and should **contribute to their accessibility and active water-related uses**. Development Plans should identify opportunities for **increasing local distinctiveness** and recognise these water spaces as environmental, social and economic assets.
9. Note 9.17.2 Generally, permanently-moored vessels and development into waterways should only be permitted for water-related uses. However, ancillary uses, such as bars and restaurants (for example ancillary to a passenger pier), can support enhancements of water-related uses, as well as improve access to or along waterways and related public realm. Ancillary uses can also add to the diversity, vibrancy and regeneration of waterways, **in particular in basins or docks**. The specific siting of such facilities requires careful consideration so that **navigation, hydrology, biodiversity and the character, access to, and use of waterways is not compromised**. The waterways should not be used as an extension of developable land in London, nor should parts be a continuous line of moored craft.