

Royal Borough of Greenwich  
Woolwich Centre  
5th Floor  
35 Wellington Street  
Woolwich  
SE18 6HQ

Ref: 125-004  
Date: 8 April 2024  
Via Planning Portal (ref. PP-12912078)

Dear Sir or Madam

18 Greenwich Church Street, Greenwich, SE10 9BJ

Application for cooking extract and associated plant

We are pleased to enclose an application submitted on behalf of our client, Pho Trading Limited, that seeks full planning permission for the installation of cooking extract and associated plant at the above address ('the site') that will operate as 'Pho'.

In support of this application, the following documents have been submitted through the Planning Portal. The scope of submission has been informed from a review of the validation checklist and comprises:

- Application forms and fee
- This covering letter
- Site location plan (ref. OS.01)
- Existing flat roof plan and elevations (ref. RP.01)
- Proposed HVAC Layout (ref. QUO03917/001 Rev 0)
- Proposed Roof & Elevations HVAC Layout (Specification details of equipment) (ref. QUO03917/003 Rev 0)
- Noise impact assessment
- Pho brochure
- CIL form

The proposed plant and risers are necessary to facilitate the operation of Pho.

## Background context

Founded in 2005, Pho Trading Limited has become an established restaurant operator with over 40 venues across the UK, offering great value healthy Vietnamese cuisine. All food is freshly prepared and cooked on-site every day. Since the covid pandemic, the business has grown significantly and now employs over 1050 staff across its outlets and has a turnover in excess of £70m. Greenwich has always been a top priority for Pho who are extremely excited to be opening a new venue within Greenwich town centre. Pho operate in a number of London locations and is a much loved fixture of the 'high street' serving a loyal local customer base as well as numerous tourists.

## The site

18 Greenwich Church Street is in Greenwich town centre. It is located within a mixed-use block between Durnford Street and Triumph Lane, which contains mainly restaurants and cafes in addition to a few shops. Greenwich Church Street is located in a part of the city that contains a large range of bars and restaurants.

The site is currently occupied by Kaspas Desserts (use class E(b), Sale of food and drink for consumption (mostly) on the premises).

18 Greenwich Church Street is a mid-terrace building comprised of three stories. Above the ground floor restaurant ('the site'), there is a three-bedroom residential unit on the first floor, which received planning permission in 2019 for a change of use from an internet café (ref. 19/1123/F) and a four-bedroom residential unit on the second floor. The landlord retains ownership of all three floors and operates the two residential units as short term lets.

The direct neighbours, along Greenwich Church Street, include Payton and Byrne Bakeries and For Eyes Spectacles and Contact Lenses. To the rear of the site is a service space. A large majority of buildings surrounding the site have commercial uses at ground floor level and residential uses at the upper levels.

18 Greenwich Church Street is within the Maritime Greenwich World Heritage Site and West Greenwich Conservation Area. The building is not listed, although there are statutory and locally listed buildings within the surrounding area.

The site is situated within an easily accessible, town centre location with good proximity to existing public transport routes. Greenwich Church Street bus stop and Cutty Sark DLR station are within a 2-minute walk providing regular services throughout the day and evening.

The site is located partially within Flood Zone 2 and 3.

## The proposal

Pho Trading Limited is extremely positive about Greenwich and is looking to invest in the order of £900,000 into the building. Subject to achieving an acceptable planning consent, Pho have signed a 15-year lease for the ground floor and basement of 18 Greenwich Church Street totalling 242.66 m<sup>2</sup> (2,612 ft<sup>2</sup>).

Their investment and refurbishment will transform the ground floor into a Pho Vietnamese restaurant, which is in the same use class as the previous use (use class E commercial business and service). The new unit will accommodate approximately 75 covers. Additionally, it will generate circa 25 jobs on-site in addition to those providing headquarter support.

We attach detail of the existing and proposed refurbishment of the roof for information, to enable officers to understand the extent of the proposed transformation. The applicant is keen to meet the conservation officer on-site to discuss the proposals.

As identified on the plans, the refurbishment includes the replacement of the flat roof structure to the rear of the unit and the addition of a new glazed roof lantern. The nature of these modifications does not represent a material change enough to require planning permission and have been submitted for information.

Critical to the success of the new venture, is securing permission for the necessary plant and low lever riser to accommodate the kitchen to the rear and allow the new tenant to occupy and trade from the unit as a restaurant, which is the objective of this application. The equipment includes:

- Kitchen extract fan (EF-01: Helios GBD 710/4 Extract Fan)
- 2no. new 1500mm Attenuators
- 2no. Electrostatic Precipitators (ESP 4500)
- Carbon pre filter
- Carbon filter
- Supply fan (Systemair MUB 100 630 Multibox)
- Supply filter and bird break with mesh
- Fridge condenser

Additionally, there is some obsolete extraction equipment within this location that the applicant will be removing and replacing.

Mindful that the site lies within a Conservation Area and World Heritage Site, the proposed equipment will be situated to the rear, within the same location where the existing redundant equipment is situated. It will therefore be shielded by existing surrounding commercial buildings and not readily visible from the public highway. The riser will connect to the ground floor restaurant kitchen and extract onto the single-storey flat roof above the kitchen.

Pho Trading carry out fastidious and routine cleaning of their extract systems. The hood and plenum would be cleaned weekly with the fans and riser being cleaned no less than three times a year dependant on volumes.

### Relevant planning policy

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise.

The statutory Development Plan comprises the Royal Greenwich Local Plan: Core Strategy, Supplementary Planning Documents and the London Plan.

The National Planning Policy Framework (NPPF, 2023) and National Planning Practice Guidance (NPPG) are material considerations of significant weight. Supplementary planning documents (SPDs) are also material considerations.

Royal Greenwich Local Plan: Core Strategy (2014)

Policy EA1 supports the expansion of existing businesses and increased employment opportunities to facilitate high-quality jobs.

Policy TC1 sets out that town centres are the preferred location for uses that attract and serve the public.

Policy TC4 considers policy relevant to Greenwich Town Centre, it sets out that the borough will protect and enhance the centre's historic character, whilst promoting it as a multi-functional centre, tourist destination and centre for tertiary education.

Policy TC(a) considers that within Greenwich, a minimum of 50% of ground floor frontages should be available for A1 retail use.

Policy TC(b) sets out the council will support the provision of a range of activity generating non-retail uses including evening activities. Non-retail proposals: should directly serve visiting members of the public, must not result in the loss of A1 retail units and should not increase fear of crime or anti-social behaviour.

Policy DH1 sets out that all developments are required to be designed to a high quality and positively contribute to the built and natural environment.

Policy DH3 set out that development should seek to protect and enhance heritage assets and the setting of Royal Greenwich.

Policy DH4 sets out that within Maritime Greenwich World Heritage Site, development should protect and enhance their 'Outstanding Universal Values.' Greenwich assigns high importance to retaining cultural and natural heritage for the benefit of present and future generations.

Policy DH(b) outlines that applications will only be permitted where it is demonstrated that it does not cause an unacceptable loss of amenity to adjacent occupiers, in terms of loss of daylight, sunlight or privacy.

Policy DH(h) sets out that within Conservation Areas, planning permission will only be granted for proposals that preserve and/or enhance the character or appearance of the Conservation Area. Development should take into consideration the local scale, pattern of development, building form, materials, and landscaping.

Policy E(a) Pollution outlines that permission will not be granted for a proposed development that would result in unacceptable pollution.

The London Plan (2021)

On a regional level, the London Plan (2021) sets out the mayor's planning strategy and contains strategic thematic policies for Greater London.

Policy GG1 outlines the importance of inclusive growth, to achieve this crucial town centre uses must be promoted and places that provide important opportunities for building relationships during the daytime, evening and night time must be planned for.

Policy GG5 sets out that in to continue to grow a 'good economy,' enhancing global economic competitiveness and economic success among all, those involved in planning must promote and support London's rich heritage and cultural assets, and its role as a 24-hour city.

Policy SD6 outlines that town centres should be promoted through the strengthening of town centres as a main focus for sense of place and the management of daytime, evening and night-time activities to enhance town centre viability.

Policy SD7 sets out that boroughs should take a town centre approach when considering development proposals.

Policy D14 outlines that developments should manage noise pollution by avoiding significant noise impacts, minimising and mitigating existing impacts.

#### National Planning Policy Framework (2023)

The National Planning Policy Framework states that the purpose of the planning system is to contribute to the achievement of sustainable development which has three overarching objectives, economic, social and environmental.

Paragraph 8 sets out that the economic objective is to help build a strong responsive and competitive economy. The social objective is to support strong vibrant and healthy communities. The environmental objective is to protect and enhance our natural, built and historic environment, making effective use of land. Paragraph 11 sets out that decisions should apply a presumption in favour of sustainable development.

Section 6 of the NPPF addresses the building of a strong, competitive economy. Paragraph 85 sets out that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt, outlining that significant weight should be placed on the need to support economic growth.

Section 7 seeks to ensure the vitality and viability of town centres. Paragraph 90 sets out that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.

Section 12 relates to achieving well-designed places. Among other things, Paragraph 135 sets out that decisions should ensure that developments are visually attractive; function well and add to the overall quality of the area; and establish and maintain a strong sense of place, responding to local character and history while not preventing or discouraging appropriate innovation.

### Planning assessment

#### Principle of the development

Paragraph 11 of the NPPF encourages a positive, permissive, and proactive approach to promoting the viability and vitality of the country's centres and London Plan policy SD7 sets out that a town centre-led approach should be promoted. The provision of the proposed plant and riser equipment will enable this building to be reoccupied and to operate as a restaurant which is in the same use class as the former Kaspas Desserts,

and will in turn, contribute positively and help promote the town centre and economic growth in line with Greenwich Local Plan policy EA1 and TC1 and London Plan policy GG1 and GG5.

The occupation of the unit will help generate additional trade and footfall through the town centre area. Paragraph 85 of the NPPF places significant weight on the need to support local businesses and economic growth and London Plan policy SD6 stresses the importance of strengthening the town centre and managing the daytime, evening and night-time activities of town centres to increase viability.

The location of the proposed development is within the defined town centre and the proposal accords with Greenwich Local Plan policy TC(b) relating to town centre uses, which states that the council will support the provision of a range of activity generating non-retail uses including evening activities. Greenwich Local Plan policy TC(a) considers that within Greenwich, a minimum of 50% of ground floor frontages should be available for A1 retail use. The site is already occupied by a food / drink vendor there is no change here. The development therefore accords with the development plan and is considered acceptable in principle.

The proposal, which will enable a vacant building to be brought into productive and viable use, clearly represents sustainable development.

#### Heritage considerations

The site is within the Greenwich Park Conservation Area and Maritime Greenwich World Heritage Site. There are some listed buildings within the vicinity, namely the Grade II listed Coach and Horses Public House which sits to the east of the property. As part of this submission, the application has considered the potential impact of the rooftop plant on the significance of the designated heritage assets.

The plant equipment has been designed and positioned as discreetly as possible and is accurately presented within the submitted documents. Through its location at the very rear of the unit, within a contained rear yard, the proposed plant will be screened from public view entirely. The application site already benefits from redundant plant equipment within this location, and so this proposal will have no greater impact on the designated heritage assets than existing equipment.

The proposed plant and riser equipment is an essential component of the proposed use of the building and so the public benefits are considerable and include:

- Enabling a vacant building on a prominent street in Greenwich centre to be brought back into productive and optimal use.

- Enabling Pho Trading to invest £900,000 into the town centre, helping refurbish the prominent building within the conservation area and generating up to 25 new jobs on-site in addition to the headquarter support roles,
- Introducing a new healthy food and drink offer in the town centre helping boost footfall and tourism.

#### Noise and amenity

The restaurant/ cafe use of this unit is well-established and dates back to at least 2008 based on Google imagery. There is no evidence of noise complaints over this time.

The closest noise-sensitive receptor is the first floor flat above the unit which was introduced in 2019 pursuant of planning permission reference 19/1123/F. The officer's report for this decision sets out that the proposed windows provide the required level of external noise mitigation.

In respect of noise, the proposal is situated in a busy, town Centre location and is surrounded by other established similar uses, notably Lokanta Bar and Grill, Bill's Restaurant and Pizza Express.

The submitted noise assessment identifies that the predicted noise from the proposed plant will result in noise levels below Royal Borough of Greenwich Council's proposed limits at the nearest noise-sensitive receptors.

In accordance with London Plan Policy D14 the proposed plant, ducting and external alterations will not have an unacceptable adverse impact on surrounding amenity and is shielded from the public highway.

The submitted Noise Assessment concludes that the proposal complies with national and local policies. Therefore, noise should not be grounds for refusal of planning permission for the proposed development.

#### Conclusion

The proposed introduction of this essential plant will facilitate the occupation of a vacant unit, bringing it back into optimal use. As such, it accords with the adopted development plan and represents sustainable development, contributing significantly to the town centre evening economy.

It will bring a popular and well-established new restaurant brand into the town centre to further activate this area of the conservation area, enhancing the character of Greenwich Church Street with the improved frontage.

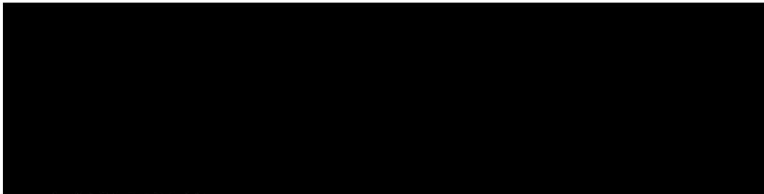


The approach to the plant design will not impact on the significance of the heritage assets and, overall, the new restaurant will help drive additional footfall and make a positive contribution to the vitality and viability of the town centre, in accordance with national and local policy.

The proposed development is therefore in accordance with national and local policy and there are no significant material considerations that weigh against the proposal and, in accordance with Paragraph 11 of the NPPF, we would be grateful if the application could be approved without delay.

We trust the application can be validated at your earliest convenience. Should you have any queries, please do not hesitate to contact us.

Yours sincerely,



**cc:** Pho Trading Limited