



Development Management  
Royal Borough Greenwich Council  
Woolwich Centre  
35 Wellington Street  
London  
SE18 6HQ

30 October 2023

Dear Sir/Madam,

**38-42 Hare Street, Woolwich SE18 6LZ**

On behalf of our client, Tender Grace Christian Centre (TGCC), please find enclosed a full planning application for the change of use of the first and second floors of 38-42 Hare Street, Woolwich from offices (Class E) to a new religious use (Class F1).

In addition to this cover letter, the application submission package comprises the following documents:

Site Location Plan (Ref LP1);

Existing/Proposed Plans (Refs HS-WSP-00-XX-DR-LA-000 1 and HS-WSP-00-XX-DR-LA-0002);

Planning Application Form and Certificates; and  
CIL form.

The required application fee of £462.00 has been paid online via Planning Portal directly to the Royal Borough of Greenwich by the applicant.

**SITE DESCRIPTION**

The application site relates to the first and second floors of 38-42 Hare Street which are currently vacant, but they were formally in office use. The ground floor of 38-42 Hare Street is in retail use occupied by The British Heart Foundation.

The site lies within the Woolwich Town Centre Boundary within a designated Secondary Shopping Frontage with the surrounding area consisting of a mix of uses, including retail, offices, and residential. There are also a number of existing religious uses elsewhere within the town centre.

The site is well served by public transport within circa 500m of Woolwich Crossrail Station and 500m of Woolwich Station, which is served by regular Elizabeth Line, DLR, and National Rail services. The site is also served by regular bus services on Hare Street, Woolwich High Street, and throughout Woolwich Town Centre. In short, the site is very well connected to public transport and has a Public Transport Accessibility Level (PTAL) rating of 6a.



## **PLANNING HISTORY**

The site has no relevant planning history available online.

## **PROPOSED DEVELOPMENT**

To facilitate the reuse of the vacant office space by the TGCC, planning permission is sought for the change of use of the first and second floors of 38-42 Hare Street from offices (Class E) to a new religious use (Class F1). The premises will be used by TGCC as a Religious Educational Charity, where religious education classes will be conducted as well as twice weekly and monthly services for a small congregation. The TGCC would conduct weekly services on Sunday between 10am - 1pm and Thursday between 7pm - 8:30pm and monthly services on Saturday between 11am - 1pm. Whilst the application is located on a secondary retail frontage, the proposal will not result in the loss of active retail frontage as retail use is retained at ground floor level.

The proposal will provide a much needed new community facility to serve the religious community of Woolwich.

No changes are proposed to the elevational treatment or access arrangements of the site.

## **PLANNING POLICY**

The Royal Borough of Greenwich lies in Greater London, and therefore the Development Plan comprises the following documents which are read in conjunction with each other.

### Adopted Policy

The Development Plan for the Royal Borough of Greenwich comprises the following policy documents:

The London Plan (adopted March 2021);

The Royal Greenwich Local Plan (adopted in July 2014); and

The Woolwich Town Centre Masterplan SPD (adopted in April 2021)

We set out below the main policies (London Plan Policy E1 'Offices', Policy T6 'Car parking', and Policy T6.5 'Non-residential disabled persons parking'; and Greenwich Local Plan Policy TC2 'Woolwich Town Centre, Policy EA(a) 'Local Employment Sites', Policy E(a) 'Pollution', and Policy IM(c) 'Parking Standards') in these plans of relevance to the proposal.

### Emerging Policy

Preparation for the new Greenwich Local Plan has started. The LPA are currently at the initial stage of preparing the Local Plan considering issues and options for its development, Regulation 18. The Regulation 18 consultation period ended in September 2023.

### NPPF and NPPG

The NPPF (2021) and NPPG are also material considerations which seek to support the role that town centres play at the heart of local communities by taking a positive approach to their growth, management and adaptation.

In this case the proposal will help to positively re-use the vacant offices for a community use for the local area.

## PLANNING ASSESSMENT

### The Principle

#### Introduction of Community Use

Greenwich Local Plan Policy TC2 'Woolwich Town Centre' supports development that contributes to the eventual reclassification of Woolwich as a Metropolitan Centre and supports leisure, cultural and tourism uses that contribute towards the evening vitality of the Centre and increase economic benefits. Woolwich Town Centre Masterplan SPD provides further advice on the Council's vision for development in the town centre, setting out that the majority of core retail should be located on or in the streets surrounding Powis Street with active retail frontages featuring on the ground floor and that towards the western end of Powis Street it will be leisure and community uses that help to drive change in this area.

The proposals, located on Hare Street adjoining the western end of Powis Street, would be consistent with the vision set out in the SPD as the ground floor will remain in retail use, whilst the introducing a community use to the first and second floors. Whilst the SPD does not define what constitutes a 'Community Use', the proposed Class F1 Use would generally be considered consistent with a community use.

The proposal will also facilitate the reoccupation of a vacant premises within Woolwich Town Centre which will deliver economic benefits to Woolwich Town Centre including increasing visitors to the town centre. Increasing footfall will clearly benefit existing businesses elsewhere within the town centre. This would benefit would contribute to the eventual reclassification of Woolwich as a Metropolitan Centre and is therefore consistent with Policy TC2.

#### Loss of Office Floorspace

London Plan Policy E1 'Offices' states that existing viable office floorspace should be retained, facilitating the redevelopment, renewal and re-provision of office space where viable, whilst surplus office capacity should be released to other uses.

Greenwich Local Plan Policy EA(a) 'Local Employment Sites' seeks to maximise the contribution to employment in Royal Greenwich from sites in existing or previous employment use. Non-employment uses will only be permitted on vacant employment sites where it can be demonstrated that:

- i. The site is environmentally or physically unsuitable for any employment generating use;
- ii. Marketing on fair price and terms for at least two years indicates there is no realistic prospect of any form of employment arising; or
- iii. Employment is only viable within a mixed-use scheme.

For a scheme to be acceptable it only needs to satisfy one of the above criteria. The following sets out how the proposal satisfies criterion ii.

The policy refers to 'Local Employment Sites', which the Greenwich Local Plan does not define. The application site comprises vacant office floorspaces above a retail unit, which is not a typical employment site. Therefore, we query whether this policy is actually applicable to the proposal.

Moreover, the policy does not specify that it exclusively relates to Class B (now Class E) uses only, as the Greenwich Local Plan does not define what constitutes a 'Employment Use'. The TGCC

proposals relate to an employment generating use and will deliver employment benefits to Woolwich Town Centre by bringing employment back to existing vacant floorspace.

However, without prejudice of the above, the first and second floors of 38-42 Hare Street are currently vacant and have been marketed by Mr Kevin Farrow at GL Hearn since November 2021, a period of 2 years. The first and second floors of 38-42 Hare Street have been marketed on fair price terms for at least two years indicating that there is no realistic prospect of the premises being reused for offices. This also demonstrates that the first and second floors of 38-42 Hare Street cannot be considered existing viable office floorspace. An email of confirmation from Mr Kevin Farrow has been attached at **Appendix A** to confirm this.

Therefore, the proposed development is compliant with Greenwich Local Plan Policy EA(a) and London Plan Policy E1.

### **Residential Amenity**

Greenwich Local Plan Policy E(a) 'Pollution' resists development which would have a significant adverse effect on the amenities of adjacent occupiers or uses, and especially where proposals would be likely to result in the unacceptable emission of noise, light, vibrations, odours, fumes, dust, water and soil pollutants or grit.

The application site is located within Woolwich Town Centre, where the surrounding area consists of a mixture of uses including noise generating uses and there are no residential properties at the application or immediately adjoining the application site, with the closest properties are 30m to rear of the site.

The TGCC would conduct weekly services on Sunday between 10am - 1pm and Thursday between 7pm - 8:30pm and monthly services on Saturday between 11am - 1pm, therefore the proposal itself will not be in use at unusually early or late hours. In any event the services will only be conducted twice per week.

Therefore, the proposal will have a negligible impact on surrounding residential amenity and is compliant with Greenwich Local Plan Policy E(a).

### **Transport**

#### Traffic Generation

The application site is located within Woolwich Town Centre, and therefore it is sustainably located in terms of local facilities and public transport.

Given the high accessibility of the site, the majority of trips will be via sustainable modes of transport, including walking and use public transport system. Therefore, the proposal will have a negligible impact on the highways network as it will generate minimal car trips. Additionally, this will be reinforced as the proposal is for a car-free development.

#### Parking

London Plan Policy T6 'Car parking' states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity, and that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport.



Greenwich Local Plan Policy IM(c) 'Parking Standards' states that developments supported by a high level of public transport accessibility and within Controlled Parking Zones should be car free.

Given the high accessibility of the site, the proposed development will be car-free in line with London Plan and Greenwich Local Plan policy for sites in areas with high public transport accessibility. The proposed development is sustainably located and promotes opportunities for sustainable modes of transports. Therefore, the proposed development is compliant with Greenwich Local Plan Policy IM(c) and London Plan Policy T6.

London Plan Policy T6.5 'Non-residential disabled persons parking' states that disabled persons parking should be provided in accordance with the levels set out in Table 10.6, ensuring that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay. Table 10.6 requires a minimum of two designated disabled persons parking spaces for religious buildings.

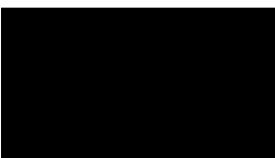
Three on-street disabled persons parking bays are located on Hare Street, immediately adjacent to the entrance of the site, and further disabled persons parking bays are located on Powis Street. Therefore, the proposed development is compliant with Greenwich Local Plan Policy IM(c) and London Plan Policy T6.5.

## **CONCLUSION**

The proposal will facilitate the reoccupation of a vacant floorspace within Woolwich Town Centre which will benefit the town centre as supported by Development Plan policies and provide a much need community facility. It has also been demonstrated that the proposal will not impact on amenity of the area and will not impact on parking or highway safety.

We trust that you have everything you require to determine this planning application, and that you will be able to recommend it for approval in the near future. In the meantime, should you have any queries in respect of this submission or would like to discuss matters further, please do not hesitate to contact myself or my colleague Andy Astin.

Yours faithfully



Daniel Harley  
Senior Planner

## **Appendix A**

Marketing Email from Mr Kevin Farrow at GL Hearn

## Harley, Daniel

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**From:** Farrow, Kevin  
**Sent:** 31 October 2023 13:56  
**To:** Harley, Daniel  
**Subject:** FW: 38- 42 HARE STREET WOOLWICH

Good morning Dan ,

As letting agents representing the tenant of the 1<sup>st</sup> and 2<sup>nd</sup> floors at 38 –42 Hare Street Woolwich SE18 , , we set out below an update in respect of our marketing the interest of these premises to date for your information, which we are happy for you to share with your planning consultants and local planning authority:

GL Hearn began marketing the 1<sup>st</sup> and 2<sup>nd</sup> floors in November 2021. Within this period, there has been a very poor demand from any occupiers and unfortunately no interest from office occupiers, receiving only a handful of enquiries during the last 24 months, from which none has progressed to detailed conversations regarding acquisition of the premises.

We are currently marketing the space on the basis of either the entire demise over GF Lobby , 1<sup>st</sup> floor and 2<sup>nd</sup> floors OR a split offering individual floors of 2750 sq ft per floor , with the intention of broadening the pool of enquiries.

Offering this range of admittedly limited option of sizes has not improved the demand from prospective tenants, likely underpinned by the increased prevalence of serviced office providers across central London that have lured smaller firms away.

The average rent for the Woolwich submarket for this quality of accommodation is £13.50 per sq ft. According to CoStar, 7 of the 10 transactions completed in 2023 within the Woolwich submarket have been less than 900 sq ft. Vacancy rates for buildings of this size have risen, shifting the overall availability rate up within the submarket.

Transport for London have been attempting to release floors of 30,000 sq ft on a sublease at 14 Pier Walk Greenwich since October 2022, again this met with a very limited response according to their agents Cushman & Wakefield.

Even with the introduction of the Elizabeth line at Canary Wharf, North Greenwich area and Woolwich in particular is still very much seen as a 'secondary' office location and will struggle to match the City and West End.

### Alternative Uses

The permitted use of the building under the Town and Country Planning (Use Classes) Regulations 2004 falls under Use Class E.

We have given consideration as to whether the building caters for any uses that fall within this class, to which we cannot see any that would increase demand.

However, given the highly accessible location of the building at the heart of Woolwich Town Centre , we conclude that a 'dual-use' of office and Educational (F1) would be of increased benefit.

To date, the only party we are having advanced discussions with in respect of interest in the 1<sup>st</sup> and 2<sup>nd</sup> floors is with TGCC

Please let us know if you require any further detail

[Kevin Farrow](#)  
Head of Retail

GL Hearn