



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

Our Ref: 70117728

16 January 2024

Dear Sir or Madam,

38-42 Hare Street, Woolwich SE18 6LZ

On behalf of our client, Tender Grace Christian Centre (TGCC), please find enclosed a revised planning application for the change of use of the first and second floors of 38-42 Hare Street, from offices to a place of worship with associated community services.

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

- Location Plan
- Existing and Proposed Floor Plans
- Marketing Report prepared by GL Hearn
- Application Form
- CIL Form

The application is being resubmitted following the withdrawal of the previous application reference 23/3547/F for the proposal in December 2023, as the Case Officer (Eleanor Mack Briggs) required further information to support the change of use from office space that is proposed.

As requested by the Case Officer, this revised application is supported by a Marketing Report prepared by GL Hearn which demonstrates that despite marketing for two years, there has been limited interest in the re-use of the offices. It also highlights that the space is not suitable to meet modern requirements, and this would require substantial investment by any future tenant to occupy this space and that would significantly impact on viability. As such, the site represents surplus office space which will continue to remain vacant and clearly this will have no benefits for the future vitality and viability of the town centre.

Therefore, the proposed change of use complies with Policies E1 of the London Plan and EA(a) of the Royal Greenwich Local Plan.

SITE DESCRIPTION

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



The site lies within a designated Secondary Shopping Frontage in Woolwich Town Centre; thus, the surrounding area consists of a mix of uses, including retail, offices, and residential. There are also several existing religious uses elsewhere within the town centre.

The site is well served by public transport, being within 600 metres of Woolwich Arsenal Station, which is served by the DLR and National Rail services and 700 metres from Woolwich Station which is served by the Elizabeth line and the National Rail services. In addition, the site is within walking distance of several bus stops on Hare Street and Woolwich High Street.

PLANNING HISTORY

As highlighted above, a planning application was submitted in November 2023 (ref: 23/3547/F) 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(f)). However, this application was subsequently withdrawn on 20th December 2023.

Other planning history includes:

94/1208/F Change of use from cafe and vacant shop to public house and members snooker club.
Approved – 07/12/1994

95/1167/F Conversion of first and second floors into offices and consulting rooms for drug and alcohol abuse agencies.
Approved – 24/01/1995

PROPOSED DEVELOPMENT

Planning permission is sought for the change of use of the first and second floors of 38-42 Hare Street from offices to a place of worship with associated community services. This results in a change of use from classes E(g)(i) to F1(f).

The premises will be used by TGCC, a Christian charity, who will conduct twice weekly and monthly services for a small congregation. TGCC are currently based in Camberwell but are having to relocate due to a rise in the rent of the existing venue, which makes it unaffordable for a small charity organisation. The weekly services, which are unchanged from the existing venue schedule, will be held on a Sunday between 10:00 - 13:00 and on a Thursday between 19:00 - 20:30 with a monthly service on a Saturday between 11:00 - 13:00. The charity will also offer some community services in relation to this including one to one meetings with the pastor after services and IT training. Furthermore, the premises will include offices for the pastorates to carry out administrative duties.

The proposal provides a much-needed new community facility to serve the Christian community of Woolwich.

PLANNING POLICY

Local Planning Policy

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



The London Plan (2021)
The Royal Greenwich Local Plan: Strategy with Detailed Policies (2014)
The Woolwich Town Centre Masterplan Supplementary Planning Document (2021)

The main policies of relevance to the proposal include:

London Plan Policy E1 'Offices'
London Plan Policy SD6 'Town centres and high streets'
London Plan Policy T6 'Car parking'
London Plan Policy T6.5 'Non-residential disabled persons parking'
Greenwich Local Plan Policy TC2 'Woolwich Town Centre'
Greenwich Local Plan Policy EA(a) 'Local Employment Sites'
Greenwich Local Plan Policy E(a) 'Pollution'
Greenwich Local Plan Policy IM(c) 'Parking Standards'

We set out below how the proposal complies with these policies as well as the Woolwich Town Centre Masterplan Supplementary Planning Document (SPD).

National Policy

The National Planning Policy Framework (NPPF) (2023) is a material consideration which seeks 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 positively re-use vacant offices for a community use which will benefit the local area.

Emerging Policy

The Council are currently preparing a new Local Plan and consulted on the Issues and Options from July – September 2023. However, given its early stage of preparation it carries no weight in the determination of this application.

PLANNING ASSESSMENT

Principle of Development

Appropriateness of Religious Use in Town Centre Location

Policy TC2 of the Local Plan supports leisure, cultural and tourism uses that contribute towards the vitality of Woolwich Town Centre and increase economic benefits. The Woolwich Town Centre Masterplan SPD provides further advice on the Council's vision for the 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 frontages at ground floor and that in the western end, it will be leisure and community uses that help to drive change in this area.

The proposal is located on Hare Street adjoining the western end of Powis Street, would therefore be consistent with the vision set out in the SPD as it introduces a community use to the first and second floors. Whilst the SPD does not define community uses, the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 defines Use Class F as "Local Community and Learning", so the proposal would be considered to fall within this category described in the SPD. The proposal will also facilitate the reoccupation of vacant premises which

will deliver economic benefits to Woolwich Town Centre through increasing visitors to the town centre. Increasing footfall will clearly benefit existing businesses elsewhere within the town centre.

Therefore, the proposal is consistent with Policy TC2 of the Local Plan, the Woolwich Town Centre Masterplan SPD, and the NPPF.

Loss of Offices

In terms of the loss of the offices which is the key issue in respect of the application, Policy SD6 of the London Plan sets out that the change of use of identified surplus office space in town centres to other uses should be supported, taking into account the need for suitable business space. Policy E1 of the London Plan further adds that existing viable office floorspace should be retained but surplus office capacity should be released to other uses. Paragraph 6.1.7 of the London Plan defines surplus office space as sites and/or premises where there is no reasonable prospect of these being used for business purposes. Evidence to demonstrate surplus office space should include evidence of vacancy and marketing (at market rates suitable for the type, use and size for at least 12 months, or greater if required by a local Development Plan Document).

In addition, Policy EA(a) of the Local Plan seeks to maximise the contribution to employment in Royal Greenwich from sites in existing 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. We explain below how we have satisfied Policy EA(a) criteria ii. However, it is noted that 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.

Nevertheless, the submitted Marketing Report demonstrates that the first and second floors of 38-42 Hare Street which are currently vacant have been marketed by GL Hearn since November 2021, a period of over two years at a fair price, indicating that there is no realistic prospect of the premises being reused for offices. The site had a marketing board, was advertised online via Estate Agents Clearing House and Perfect Information Property and the marketing particulars circulated via multiple WhatsApp Groups. This resulted in only one party in last two years interested in the site for the re-use as offices, which did not result in a viewing. This demonstrates that the site cannot be considered viable office space.

The Marketing Report highlights that the poor layout of the two floors and the relationship between them makes the space unsuitable for modern office working requirements. The site is also in close proximity to better quality, modern office floorspace in Canary Wharf and is located outside office clusters in the CAZ, NIOD, Tech City, Kensington & Chelsea, and other strategic locations. These two important factors have resulted in little interest in the site as office space.

Furthermore, Greenwich's Local Plan Topic Paper on Employment (July 2023) notes that the long-term impacts of the Covid-19 pandemic are yet to be fully understood but in the short term there has been an increase in home working and a reduction in the demand for office space.

Taking all this into account, the site has no realistic prospect of being let out as offices and the only option to ensure it no longer lies vacant is a change in use. In summary, the change of use would allow a vacant unit to be brought back into beneficial community use which is acceptable in this location in line with the Woolwich Town Centre Masterplan SPD.

As such, the loss of an office space and the change in use to a place of worship with associated community services is acceptable in principle and should be supported by the Council, complying with Policies E1 and SD6 of the London Plan and EA(a) and TC2 of the Local Plan.

Residential Amenity

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

The application site lies in a town centre location where the surrounding area consists of a mixture of uses, including noise generating uses. There are no residential properties either within or immediately adjoining the application site, with the closest residential apartments circa 25 metres to rear of the site. The TGCC would only conduct weekly services on a Thursday between 19:00 - 20:30 and Sunday between 10:00 - 13:00, with monthly services on Saturday between 11:00 - 13:00 with an average of 32 people attending each service. In addition, there would be small groups or individuals seeking additional community services offered by TGCC, but due to the number of people and the times, this would not cause undue noise and disturbance to any nearby residential occupiers given the other town centre uses.

The premises would not be used or offer services early in the morning or late at night. The hours of use would be commonplace in a town centre location and most activity would be when other uses within the town centre are operating. Moreover, the level of activity would not be significantly different to that of an office given the low number of services and community sessions and the moderate attendance numbers.

Additionally, planning history reveals that the Council previously supported a public house and members snooker club, typically late-night activity uses, on this site, suggesting that more moderate noise generating uses are acceptable in this location.

Therefore, given all the above, the proposal would have a negligible impact on the amenity of any surrounding existing residents and will not cause undue noise disturbance in compliance with Policy E(a) of the Local Plan.

Highways and Transport

The application site is located within Woolwich Town Centre and has a Public Transport Accessibility Level (PTAL) rating of 6a and is therefore within a highly sustainable location. Of note,



the Highways Officer supported the previous application given the town centre's good access to public transport, the existing waiting restrictions and nearby public car park availability.

Given the accessibility of the site, the majority of trips will be via sustainable modes of transport, including walking and public transport. 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.

Policy T6 of the London Plan 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 well-connected by public transport.

Policy IM(c) of the Local Plan further adds 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 and is sustainably located and promotes opportunities for sustainable modes of transports. Therefore, the proposed development complies with Policies T6 and IM(c).

CONCLUSION

The proposal will facilitate the reoccupation of vacant floorspace within Woolwich Town Centre which will benefit the town centre as supported by Development Plan policies and provide a much-needed new community facility. This resubmission now clearly demonstrates through the Marketing Report that there has only been one interested enquiry in the use of the site as offices over the last two years and there is no prospect of the offices being re-occupied.

If the Council refuse this application, it will not result in the office space being occupied, but they will simply remain a vacant unit which would not help economy, community, or Woolwich's goal of becoming a Metropolitan Town Centre.

It has also been demonstrated that the proposal will not impact on the amenity of any nearby residents and will not impact on parking or highway safety.

We trust that the Council can now support the proposal on this basis. However, should you have any queries in respect of this submission or require any further information, please do not hesitate to contact me.

Yours faithfully,



Holly Ganderton
Senior Planner