

Planning Note

Observatory Building, Woolwich: Key Land Use Considerations

1. Introduction

- 1.1 Avison Young (AY) has prepared this Note on behalf of the Defence Infrastructure Organisation (DIO) to inform the Royal Borough of Greenwich's (RBG) position concerning the future use of the Observatory building site at Royal Artillery Barracks, Woolwich site ('the Site').
- 1.2 This Note describes the site and its surrounding context, in addition to setting out the relevant planning history associated with the site and the key planning policy considerations (and other material considerations) which would impact its future use.

2. Site and Surroundings

- 2.1 The site is located immediately north of Napier Lines Barracks at Green Hill, Woolwich, London, SE18 4BW, which currently forms part of the wider Royal Artillery Barracks (RAB) site.
- 2.2 The site extends to approximately 0.36 ha and accommodates a c. 293 sqm (GEA) building. The building is located on sloping terrain and is set over two storeys (lower ground and ground). The building is regular in shape and is accessed from an entrance lobby which is located to the west of the building. The front elevation faces east and overlooks an area of open space. According to Historic England's report on the nearby Rotunda¹, the building was constructed in 1838-9 and was extended to the west in 1852-3.
- 2.3 The Observatory site is located outside of the secure perimeter fence to the main RAB, Woolwich Barrack site ('outside of the wire'), however, it is used solely by the Army and forms part of the single planning unit which is RAB Woolwich.
- 2.4 It is located north of Green Hill Road, which bends round to the west of the site. The site has its own access route and car parking to the south of the building. It is set on a raised area of land which slopes down sharply to the west. An area of green space and amenity space including a play area and MUGA are located to the east of the site. There is a residential area located to the north and north east of the site and comprises Service Family Accommodation which is owned and operated by Annington Homes. The surrounding area is primarily owned and used by the Ministry of Defence.
- 2.5 Figure 1, below, provides details of the Observatory site's location and curtilage.

¹ Historic England, 2020. The Rotunda (former Royal Artillery Museum), Woolwich Common, London Borough of Greenwich: History, Structure and Landscape. Research Report Series no.251-2020.

Figure 1: Observatory Site Location Plan**Current Lawful Use**

- 2.6 The Site/Observatory building has been in continual use by the Army since it was built in 1838 and was the first headquarters of the Royal Artillery Institution (RAI). It also served the Magnetic Observatory before it was moved to Kew Observatory in 1871. The Army continued to use the building as an Observatory until 1926, when all Observatory related uses ceased.
- 2.7 We understand that the Army continued to use the Observatory site to support operational training at RAB Woolwich between 1926 – 1990s. It is understood that the Ministry of Defence Police (MDP) used the building during the late 1990s to 2010. MDP vacated the site in 2010, after which the Royal Military Police (RMP) moved in. RMP vacated the building in 2015.
- 2.8 The site is now used by the RAB, Woolwich Chaplaincy (2015-present). The Chaplaincy provides pastoral services to the Army. These services extend to military personnel and their families only. The building's current use is not therefore accessible by the public. As such, we understand the lawful use of the Observatory to have always comprised a Class C2A (secure residential institutions) use, which is ancillary to the main RAB Woolwich site. Furthermore, the ancillary use of the Site to the wider Barracks is understood to be long-standing.
- 2.9 The Observatory site is now surplus to the Army's requirements, much like the majority of the wider RAB, Woolwich site, and is due to be disposed of in the future. The Observatory site will likely be disposed of as a discrete development opportunity in advance of the sale of the wider RAB Barracks site.

Heritage Context

- 2.10 The Observatory comprises a Grade II listed building. It was first listed 1973. The listing includes the mid 19th century alterations noted above (extension to the rear). The listing describes the building as being of traditional construction with brick elevations and a low pitched, hipped slate roof with deep eaves. The roof structure includes a brick cornice in two planes and a central pedimented gable. The window detailing includes gauged brick arches above sash windows with glazing bars. Multicoloured stock brick has been used across the building.

- 2.11 The building supported two domed equatorial rooms at the north and south end of the building. These housed the buildings telescopes and were demolished in 1926 following the cessation of Observatory related uses.
- 2.12 The property is currently in good condition, owing to its continued use by the Army. The building is currently maintained by DIO on a regular basis.
- 2.13 The Observatory site is also within Woolwich Common Conservation Area.

Other Relevant Planning Designations

- 2.14 The Observatory site is not allocated for development in the adopted Local Plan. However, the following planning designations are relevant to the Observatory site:
 - Metropolitan Open Land
 - Area of Special Character
 - Located approximately 800m from a designated town centre
 - Flood Zone 1 (low risk of flooding)
 - London's Green Chain
 - PTAL rating of 2
- 2.15 The Rotunda site is located to the north west of the Observatory site and includes a Grade II* listed building and Scheduled Ancient Monument. The Rotunda is listed for its significant historical association with royal and military activities and includes a single building which was designed as a 34m diameter ballroom in the form of a military bell tent. The Observatory also has some historic relationship with the Rotunda, resulting from their links as historic training and education facilities, which lends some limited contribution to its own significance. RBG will be aware that AY have prepared a similar Planning Note to support the early disposal of this site.
- 2.16 Repository Woods are located to the north west of the site, beyond the Rotunda building, which is designated as a Site of Nature Conservation Importance. The woods are also designated as a Grade II Registered Park / Garden. There are two Areas of High Archaeological Potential (AHAP) adjacent to the site (29: Barrack Field and 30: Rotunda and Repository Wood).

3. Future Land Use Considerations

Current Lawful Use

- 3.1 As set out above, the Observatory building is currently used by the Army as a Chaplaincy and provides pastoral services to military personnel and their families only. The Observatory building's existing lawful use is therefore directly associated with the Class C2A Use (secure residential institutions) of the wider RAB, Woolwich site. As it stands, the Ministry of Defence (MoD) could continue to use the Observatory for similar activities (and that its lawful use is ancillary to the wider Class C2A use of the Barracks).
- 3.2 We consider there to be an opportunity to use the Observatory for a variety of different uses in the future, which would support the growth and development aspirations of RBG as set out in the adopted Local Plan. In addition, we consider the implementation of a future viable use would help

support and secure the ongoing restoration, protection, enhancement, and maintenance of this heritage asset (noting its Grade II Listed status).

- 3.3 We set out the key policy considerations associated with its potential future use below.

Ensuring Restoration and Future Maintenance of the Heritage Asset

- 3.4 Adopted RBG Local Plan Policy DH3 requires development to protect and enhance the Borough's heritage assets and their settings.
- 3.5 Within this Note we have outlined a range of potential future uses for the Observatory site which we consider would be appropriate in planning terms. As part of development proposals, some visual reference to its historic use would help to enhance the significance of the asset; however, whilst the site had a historic use as an Observatory, it is noted that the building has been significantly altered from 1926 onwards, and so appreciation of this aspect of the significance of the asset is no longer visible. As such, the continued use of the Site for non-Observatory related uses is not considered to result in any further harm caused to its heritage significance. These proposals would therefore help to preserve the significance of the asset. The proposals would also ensure the long-term viability of this heritage asset are secured by ensuring an effective use which would support the continued restoration, repair and maintenance of the listed building that may not otherwise be realised. There is also a potential opportunity to enhance elements of the shared currently limited significance with the Rotunda, namely the architectural form, their historic development and their association with a number of Army institutions.
- 3.6 On this basis, we consider it essential that a flexible approach be adopted concerning the Observatory site and its future use.

Potential for a Change of Use

- 3.7 London Plan Policy G3 confirms Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt and should therefore be protected from 'inappropriate development' unless justified by a 'Very Special Circumstances' case.
- 3.8 RBG Local Plan Policy OS2 confirms the uses which are considered generally appropriate within Metropolitan Open Land. These include public and private open space; open area recreational uses, sports ground and playing fields; agriculture and woodlands; open water features; golf courses; allotments; large grounds attached to educational facilities and institutions; cemeteries and associated crematoria; and nature conservation.
- 3.9 RBG Local Plan Policy OS(a) further sets out the principles for development within Metropolitan Open Land, including the change of use of existing buildings. The policy confirms where there is an existing building and its use is ancillary or essential to the surrounding MOL (in accordance with those uses listed in Local Plan Policy OS2), its change of use to a use which is not ancillary to the MOL (and therefore outside of the defining uses set out in Policy OS2) will not normally be permitted.
- 3.10 We consider the most recent use of the Observatory to be C2A. This existing use is not one which is considered to be ancillary to the surrounding MOL and so we consider this part of Policy OS(a) would not apply. Consequently, and subject to the proposals meeting other policy requirements within the Local Plan, a change of use would likely be supported.
- 3.11 Local Plan Policy DH(i) confirms proposals for changes of use for a Listed Building will only be permitted if it is no longer in its original use or other established historic use and the new use is beneficial to the building and is compatible with its character and features of historic interest.

- 3.12 The Observatory is no longer in its original or historical use as an observatory. We therefore conclude a change of use may be acceptable, however, the applicant would need to demonstrate that a new use would be appropriate, beneficial and would sustain and enhance the building's significance and setting. Viable uses would therefore need to be consistent with the Observatory's conservation, and any alterations would need to be considered carefully and complement other proposed uses.
- 3.13 Future planning applications would therefore need to consider MOL (Policy G3 of the London Plan and Policy OS(a) of the Local Plan) and heritage related policies (Policy DH3, DH(h), DH9i), DH(j)) in due course.

Potential for Residential Uses

- 3.14 Policy H1 of RBG's adopted Core Strategy identifies the majority of housing within RBG is expected to be delivered within 6 'Strategic Development Locations', including Woolwich Town Centre. Notwithstanding this, Paragraph 3.2.4-5 of the Core Strategy acknowledges the important role 'small sites' can also play in local housing delivery.
- 3.15 Further to the above and emphasising the importance of housing delivery in the Borough, Paragraph 4.1.6 recognises the role RBG plays in meeting London's objectively assessed housing need as a Borough which has one of the highest housing targets in London. The Borough's strategic role is therefore important to ensuring the aspirations and growth objectives of the London Plan are achieved.
- 3.16 In addition to the above, the Council's supply of housing land and delivery rates have been tested and confirmed in a recent appeal². This appeal relates to the land at Nos 6, 6-81 and Coopers Yard, Eastmoor Street and Nos 6 & 10 Westmoor Street and was allowed in May 2022. The Inspector's decision confirmed the council can demonstrate a 3.15 year supply of deliverable housing against an adopted annual housing requirement of 2,824 homes³.
- 3.17 The site is located in close proximity to an existing residential enclave which includes Service Families Accommodation and amenity space. The building's conventional shape and appearance lends itself to being converted to residential uses. It is also located in easy walking distance to Woolwich Town Centre and thus benefits from access to local amenities and public transport.
- 3.18 Although the Site is located within MOL, it already benefits from an access road and an area of hardstanding that extends across the western side of the building. This area of hardstanding could reasonably accommodate several parking spaces, as well as garden areas for any new homes on previously developed land. In line with London Plan Policy G3, which affords MOL the same protection as the Green Belt, such uses would therefore be readily able to meet the exception set out under NPPF paragraph 149 (g)(i) which allows for the redevelopment of previously developed land which would 'not have a greater impact on the openness of the Green Belt than the existing development'.
- 3.19 Given the above context, we consider there to be scope for its conversion to residential use in the future, in a manner that would not have a greater impact on the openness of the MOL. This is subject to demonstrating other policy requirements in the Local Plan can be met, particularly Policy DH(i) which seeks to protect and enhance existing heritage assets. Indeed, this approach could help ensure the ongoing maintenance of the building particularly from a heritage perspective.

² Appeal Reference: APP/E5330/W/21/3285177

³ This requirement includes a 20% buffer to account for previous under delivery.

Potential for Workspace / Commercial Uses

- 3.20 Adopted RBG Core Strategy Policy EA1 and TC1 identifies town centres as *“the preferred location for major retail, leisure, cultural, office and other uses that attract and serve the public”* within the Borough. Policy EA1 further supports the development of small and medium business space.
- 3.21 The Observatory site lies outside of a designated town centre, albeit is located within easy walking distance from Woolwich Town Centre. The building comprises circa 293 sqm (GEA) of floorspace. Whilst its conversion to workspace/commercial uses (falling under ‘Class E(c) use’) would constitute ‘major development’, we do not consider that such proposals would be of a scale which would compete with and / or undermine the vitality and successfulness of Woolwich Town Centre.
- 3.22 Further, given the Observatory’s physical characteristics and rich heritage, we consider there to be an opportunity to potentially deliver a unique and specialist contribution to local commercial and workspace opportunities in the Borough.
- 3.23 Given the above, we consider there to be potential to deliver workspace and commercial uses within the Observatory (subject to grant of planning permission, and consideration of relevant planning considerations, in due course).

Potential Use as a Community Facility

- 3.24 Policy CH1 of RBG’s adopted Core Strategy identifies that the Council will *“support the development of new and improved community facilities where there are identified local needs”*. Furthermore, Paragraph 4.7.10 states the importance community facilities can play in developing stronger and more cohesive communities.
- 3.25 Whilst the Observatory’s current lawful, and previous existing uses, have solely been related to the Army and thus has never been accessible to the public, we consider that the above policy context would support its future conversion for use as a community facility falling under either:
- Use Class E(d) ‘indoor sport/recreation use’;
 - Use Class E(e) ‘medical/health services use’;
 - Class E(f) ‘creche/nursery/day centre use’; and/or
 - Class F1/F2 ‘learning/non-residential institution/local community’ uses including (but not limited to) use by religious instruction, voluntary sector groups, training centres and other ancillary community uses.
- 3.26 The acceptability of the above community-related uses would of course be subject to the grant of planning permission, and consideration of relevant planning considerations in due course. Similar to residential uses, we consider that such uses could provide external facilities on existing hardstanding in such a way that this would not have a greater impact on the openness of the MOL than the existing development.

Potential Use for Retail / Food and Drink Purposes

- 3.27 As set out previously, Policy TC1 seeks to direct major retail uses, and other uses which *‘attract/serve the public’* (such as cafes/restaurants), to its identified town centres.
- 3.28 Whilst the Observatory site is located outside of a town centre, we consider that it has potential to be converted for retail and/or food and drink use (falling under Class E(a) and/or E(b) use and/or Sui

Generis Uses including theatres, public houses, wine bars, or drinking establishments, venues for live music performance, cinemas, concert halls). Whilst this would mark a departure from adopted Local Plan policies, we consider that the Observatory is not of a scale which would undermine/detract from the vitality and success of nearby Woolwich Town Centre.

- 3.29 The Observatory is also located adjacent to the Rotunda Site and Repository Woods beyond. These two sites are also owned by the Ministry of Defence and have the potential to become publicly accessible through development of the wider RAB Woolwich site in the future. In this sense, the Observatory is ideally located to provide a unique retail/food and drink opportunity capable of interfacing with, and complementing, this adjacent building and area of open space.

4. Conclusion

- 4.1 The current lawful use of the Observatory is C2A, and it is ancillary to the wider Royal Artillery Barracks, Woolwich site. The Observatory is now surplus to future military requirements, and we consider the building and its curtilage provide a unique opportunity for a variety of different uses to be delivered in the future.
- 4.2 There is demonstrable and significant need in the Borough to ensure the delivery of small sites contribute to the supply of housing land within the Borough and thus residential uses, subject to satisfying other policies within the Development Plan, are considered an appropriate use.
- 4.3 In addition, and although outside of a designated town centre, the Observatory is of a relatively small scale (293 sqm GEA) but provides a unique opportunity to deliver a range of future uses, including commercial, workspace, retail and food and drink offers, which would not undermine the vitality and viability of nearby Woolwich Town Centre. We consider the site's change of use in this manner would add interest to the existing offer and increase opportunities and access to amenities in the immediate locality.
- 4.4 We of are the view that a flexible approach should be applied to the Observatory site's future use as this will ensure the protection, restoration and future ongoing maintenance of the listed heritage assets. This matter, together with the benefits of securing a viable future use for the building, would be seen as a significant heritage benefit and would subsequently be a material consideration concerning planning decision for the change of use of the Observatory site in the future.
- 4.5 In addition to the land use policies identified above, other key policy considerations associated with the future use of the Observatory site include those policies relating to heritage and MOL. Any proposals for the redevelopment of the Observatory would need to consider these at the appropriate time.