

Holly Hedge House, Blackheath

in the London Borough of Lewisham

planning application no. DC/11/76646/X

Strategic planning application stage 1 referral (new powers)

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

The proposal

Temporary change of use of land and buildings at South East London Army Cadet Force, Hollyhedge House, for a period of 90 days between June and September 2012 during the Olympic and Paralympic Games for the operation of a muster briefing and development centre for the Metropolitan Police Authority.

The applicant

The applicant is Metropolitan Police Authority.

Strategic issues

The main issue is whether the temporary change of use and the erection of temporary structures for purposes of a temporary muster briefing and deployment centre for the duration of the **Olympics** will have a materially greater impact than the present use on the openness of the **MOL** and the purposes of including land in it.

Other relevant strategic issues are **urban design** and the **historic environment, biodiversity, and transport**.

Recommendation

That Lewisham Council be advised that the application complies with the London Plan, for the reasons set out in paragraph 34 of this report and does not need to be referred back to the Mayor.

Context

1 On 9 March 2011 the Mayor of London received documents from Lewisham Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 19 April 2011 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. For this application the Mayor has delegated his planning function to Sir Simon Milton, Deputy

Mayor for Policy and Planning. This report sets out information for the Deputy Mayor's use in deciding what decision to make.

2 The application is referable under Category 3D of the Schedule to the Order 2008:

"Development on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan and which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building."

3 Once Lewisham Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision, as to whether to direct refusal; or allow the Council to determine it itself, unless otherwise advised. In this instance if Lewisham Council resolves to refuse permission it need not refer the application back to the Mayor.

4 The Deputy Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The 1.12 hectare site is located on the southwest area of Blackheath. It is southwest of Greenwich Park and northwest of Blackheath town centre. The site is surrounded by heathland, linked via an access road to Wat Tyler Road to the west. Hare and Billet Road transects the surrounding heathland to the north of the site, and Mount Ponds Road is to the south of the site. Immediately southwest of the site border is Tyler House, which is in use as private residential flats.

6 Lewisham UDP designates the site as Metropolitan Open Land, a World Heritage Buffer Zone, Site of Interest for Nature Conservation, and area of archaeological priority, an Area of Special Character and it is within a Conservation Area.

7 The site is occupied by Hollyhedge House, a large post war building used as the South East London Cadet Training Centre and is currently a base for a Territorial Army Platoon. It is also hired for external events. The current building was built on the site of a 17th Century Manor house, once occupied by Lady Emma Hamilton, which suffered bomb damage and was demolished in the Second World War. The current building was purpose built for the army with officer's facilities, dormitories, equipment storage, armoury and a parade hall. Within the application site there is a vehicle parking area, and associated garages and workshops.

8 The closest section of the Transport for London road network is the A2 Shooters Hill Road, which lies some 200 metres to the north of the site. Four bus routes can be accessed within 450 metres of the site and Lewisham station is 750 metres to the southwest. The site has a public transport accessibility level (PTAL) of 2, out of 6, where six is the highest.

Details of the proposal

9 The application is for the temporary change of use of land and buildings at South East London Army Cadet Force, Hollyhedge House, for a period of 90 days between June and September 2012 during the Olympic and Paralympic Games for the operation of a muster briefing and development centre for the Metropolitan Police Authority.

10 The proposal will utilise the existing facilities within the existing house. Three additional temporary structures are also proposed to house the kitchen complex (a maximum of 19 x 10m x

2.85m high), a security cabin (1.8 x 1.8 x 3m high) and a generator (1.2m x 3m x 1.6m high) within the curtilage of the house.

Case history

11 There is no relevant case history.

Strategic planning issues and relevant policies and guidance

12 The relevant issues and corresponding policies are as follows:

- World city role *London Plan*
- Green Belt/MOL *London Plan; PPG2*
- Urban design *London Plan; PPS1*
- Historic Environment *London Plan; PPS5*
- Transport *London Plan; the Mayor's Transport Strategy; PPG13; Land for Transport Functions SPG Crossrail London Plan Alteration; 3*
- Biodiversity *London Plan; the Mayor's Biodiversity Strategy; PPS9; draft PPS Planning for a Natural and Healthy Environment*

13 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2004 Lewisham Unitary Development Plan and the London Plan (Consolidated with Alterations since 2004).

14 The draft replacement London Plan, published in October 2009 for consultation and the Lewisham Core Strategy (pre-submission stage) are also material considerations.

Metropolitan Open Land and the principle of development

15 Lewisham Council's UDP designates the entire site as Metropolitan Open Land (MOL). London Plan policy 3D.10 "*Metropolitan Open Land*" states that MOL should be afforded the same level of protection as the Green Belt of which "*there is a general presumption against inappropriate development in the Green Belt, and such development should not be approved except in very special circumstances.*" The draft replacement London Plan reiterates this.

16 PPG2 '*Green belts*' states "*with suitable safeguards, the re-use of buildings should not prejudice the openness of Green Belts, since the buildings are already there.*" PPG2 sets out that the re-use of buildings inside a Green Belt is not inappropriate development providing:

(a) it does not have a materially greater impact than the present use on the openness of the Green Belt and the purposes of including land in it;

(b) strict control is exercised over the extension of re-used buildings, and over any associated uses of land surrounding the building which might conflict with the openness of the Green Belt and the purposes of including land in it (e.g. because they involve extensive external storage, or extensive hardstanding, car parking, boundary walling or fencing);

(c) the buildings are of permanent and substantial construction, and are capable of conversion without major or complete reconstruction; and

(d) the form, bulk and general design of the buildings are in keeping with their surroundings.

17 Hollyhedge House is currently used as the South East London Cadet Training Centre. The applicant states that the cadet centre is subject to a significant amount of activity on a daily basis and it operates between 7.30am and 10pm during the week and is occupied by up to 115 people on weekday evenings and 150 people on weekends. In addition the site hosts a number of large events per year including four large cadet events, four weddings and four or so filming events. Furthermore, Greenwich University uses the site for examinations for five weeks per year. Coaches, vans and HGVs often transport people and equipment to and from the site and park on site.

18 The proposed temporary muster and briefing centre will also be used intensively during the Olympic and Paralympic games with officers being transported from their own stations within southeast London by minibus or coach to the briefing centre for briefing and then redeployed to their place of duty using the same transport. The facility will be operational 24 hours a day although the level of activity on the site will vary throughout the day. The proposed single-storey temporary kitchen complex, security hut and generator will result in a small increase in built footprint.

19 The proposal is likely to result in a temporary increase in the day-to-day vehicle movements to and from the site during the Olympic and Paralympic games. However, given the site currently hosts large events on a regular basis, the level of activity is not unusual for the site. Whilst the proposed temporary buildings will result in a small increase in built footprint the impact on the openness of the MOL is not likely to be significant given the level of screening around the site and the size of the proposed structures. Therefore, the proposal is unlikely to have a materially greater impact on the openness of the MOL or the purposes of including the land in it. The buildings will not require any external works to accommodate the temporary change of use and the form, bulk and general design of house will not be altered. Furthermore, were an impact to occur, the temporary nature of the proposal and the requirement for the facility by the Metropolitan Police Service to provide high-level security and policing during the Olympic and Paralympic Games and, as such, the benefits to London from hosting the Olympic and Paralympic Games are considered to outweigh any impact of the proposal on the openness of the MOL in this instance.

20 Therefore, the proposal complies with London Plan Policy 3D.10.

Urban design and the historic environment

21 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B which address both general design principles and specific design issues. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London, including the requirement for new developments to respect the local context, history, built heritage, character and communities.

22 London Plan Policy 4B.11 '*London's built heritage*' seeks to protect and enhance London's historic environment and Policy 4B.14 specifically address World Heritage Sites and their settings. Draft replacement London Plan Policy 7.10 '*World Heritage Sites*' state that new developments should not cause change to the setting of a World Heritage site if the change is likely to compromise the viewer's ability to appreciate the Outstanding Universal Values of the site.

23 This is one of many temporary Olympics facilities and as such its use is only required for the games, after which it will return to its current use and the temporary structures will be removed and the land made good to the satisfaction of the owner of the site. The site is located within a World Heritage Buffer Zone, an Area of Special Character and it is within a Conservation Area.

24 Given the nature of the proposal it will not have any impact on the setting of the Greenwich World Heritage site, the area of Special Character or Conservation Area. The proposal is

also unlikely to have any significant impact on the openness and view into and out of the MOL for the period that it is in use.

25 The proposal complies with London Plan Policies 4B.1, 4B.11 and 4B.14. and draft replacement London Plan 7.10.

Biodiversity

26 London Plan Policy 3D.14 and draft replacement London Plan Policy 7.19 seek strong protection of Sites of Metropolitan Importance for Nature Conservation, including Sites of Special Scientific Importance. Planning for nature from the beginning of the development process and taking opportunities for positive gains for nature through the development process is encouraged on such sites.

27 The site is designated as a site of Site of Importance for Nature Conservation. The proposed change of use and the erection of temporary structure within the curtilage of the existing house are unlikely to raise any strategic or significant biodiversity issues. The proposal complies with Policy 3D.14 and 7.19

Transport

28 The A2 Shooters Hill Road forms part of the Olympic Route Network. This route is likely to experience increased vehicular and pedestrian use during the Olympics, particularly as a result of events taking place at Greenwich Park. Therefore, the applicant's commitment to use multi-occupancy vehicles to reduce traffic impact, as well as to avoiding highway peak periods during the operation of the MBDC. Traffic delays should be factored into the shift patterns of those using the MBDC.

29 The impact of the proposed development on the public transport network is considered acceptable and the proposal complies with London Plan transport policies.

Local planning authority's position

30 Lewisham Council's position is unknown.

Legal considerations

31 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged or direct the Council under Article 6 of the Order to refuse the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

32 There are no financial considerations at this stage.

Conclusion

33 London Plan policies on MOL, urban design and historic environment, biodiversity and transport on are relevant to this application. In general, the application complies with these policies, for the following reasons:

- **MOL:** The proposal is likely to result in a temporary increase in the day-to-day vehicle movements to and from the site during the Olympic and Paralympic games. However, given the site currently hosts large events on a regular basis, the level of activity is not unusual for the site. Whilst the proposed temporary buildings will result in a small increase in built footprint the impact on the openness of the greenbelt is not likely to be significant given the level of screening around the site and the size of the proposed structures. Therefore, the proposal is unlikely to have a materially greater impact on the openness of the MOL or the purposes of including the land in it. Therefore, the proposal complies with London Plan Policy 3D.10. The proposal complies with London Plan Policies 4B.1, 4B.11 and 4B.14 and draft replacement London Plan 7.10.
- **Urban design and historic environment:** Given the nature of the proposal it will not have any impact on the setting of the Greenwich World Heritage site, the area of Special Character or Conservation Area. The proposal is also unlikely to have any significant impact on the openness and view into and out of the MOL for the period that it is in use.
- **Biodiversity:** The proposed change of use and the erection of temporary structure within the curtilage of the existing house are unlikely to raise any strategic or significant biodiversity issues. The proposal complies with Policy 3D.14 and 7.19
- **Transport:** The impact of the proposed development on the public transport network is considered acceptable and the proposal complies with London Plan transport policies.

34 The Mayor does not need to be consulted again on this application.

for further information, contact Planning Decisions Unit:

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