

TOWN & COUNTRY PLANNING ACT 1990

FORMATION OF A CAR PARK (200 SPACES) AND ASSOCIATED LANDSCAPING
OPEN LAND AT STADIUM ROAD WOOLWICH – 05/1779/F/1

COMMENTS ON THE APPLICATION OF THE QUEEN ELIZABETH NHS TRUST

SUBMITTED BY

LARGE & ASSOCIATES

ON BEHALF OF RESIDENTS OF THE NEARBY GATEHOUSE
AT THE JUNCTION OF REPOSITORY, HA HA AND STADIUM ROADS

17 AUGUST 2005

SUMMARY

This is an objection to the proposal to redevelop a part of the open space of Woolwich Common (known as the Stadium) for car parking. Essentially our objection comprises four elements, these being:

- 1) **Amenity:** The open space of Woolwich Common, including the Stadium site, is designated *Metropolitan Open Land*, it is a *Conservation Area*, part of the *Green Chain* network and it is listed as *Grade 1 Site of Borough Interest*. Woolwich Common endows considerable amenity to local, borough and London-wide communities, so much so that development of any part of the Common into a car park would have an adverse affect on the character and detract from the amenity value.
- 2) **Loss of Habitat:** Woolwich Common hosts a rich variety of habitat for fauna and flora which would be lost to the hardstanding areas of the proposed car park and there would be introduced artificial lighting, noise, pollution and round-the-clock human activity, all of which have not been properly assessed by the Applicant when making the quite absurd and entirely unsubstantiated claim that the ecological impact of the development would be '*limited*'.
- 3) **Traffic Survey & Road Safety:** The Applicant's traffic survey in support of the development is crude, incomplete and mostly statistically meaningless. No account has been given to road safety, particularly the additional hazard of introducing further traffic streams turning into and from the proposed car park to the limited width Baker/Stadium cross-route that is the only access for heavy commercial vehicles, buses and emergency vehicles servicing the hospital.
- 4) **Inadequacy of the Applicant's Case:** We find the Applicant's reasons for additional car parking at the hospital overall and, specifically, for the redevelopment of the open space of the Stadium site to be wholly unjustified. The Applicant relies upon a number of statements that are little more than unsubstantiated assertions put forward to discount the 1997 Secretary of State's decision to safeguard the open land of the Stadium site by not permitting a car park development then. In fact, the vehicular demand, usage patterns and traffic flows have not changed much beyond that predicted in 1997 and with the hospital, as a whole, now operating not much beyond its original design capacity the 1997 decision should stand. In other words, in the absence of a significant change in demand there is no greater justification for the car park development now than there was in 1997, when it was soundly rejected by the Secretary of State in order to safeguard the local environment.

We also note that over the past five or so years of operation, the Hospital Trust has failed to maintain its estate to a publicly acceptable and safe standard: There have been many incidents of dumped waste (including Special Waste such as asbestos) being left unmanaged and uncleared with the public at risk; cars have been abandoned for long periods in its car parking areas; it took five or more years for the Trust to install relatively simple measures to prevent illegal vehicle parking dangerously on pedestrian pavements, only then after the Borough had issued a public statement on the unacceptability of its management approach; and, generally, the estate gives the impression of a general inability of the Trust to manage and maintain adequate public standards of maintenance and, surprisingly, health protection over the publicly accessible areas of its estate. There is nothing in the present Application to assure that this important amenity area will be properly and competently managed in the future. Our past and present observations makes it clear that it is more likely that any redevelopment of the Stadium site would quickly denigrate into an eyesore and public nuisance.

For all of the foregoing reasons, we strongly urge the Planning Committee to reject the Applicant's proposal for the unjustifiable redevelopment of this part of the open space of Woolwich Common into a car park.

FORMATION OF A CAR PARK & LANDSCAPING AT STADIUM ROAD – 05/1779/F/1

This objection refers to the proposal as set out by the Applicant in the Planning Statement dated 6 July 2005, prepared by Robson Planning Consultancy. We have related our specific objections in terms of the London Borough of Greenwich Unitary Plan (UDP – 2004) which is taken to represent the Borough's policy and strategy with respect to all planning and development matters.

1 AMENITY VALUE - WOOLWICH COMMON AND THE AREA KNOWN AS THE STADIUM

We understand that, as a parcel of land, no distinction is made between the Stadium site and Woolwich Common and that the status and designation of Woolwich Common equally applies to the Stadium site.

In this respect the Stadium site is designated as *Metropolitan Open Land* and it is part of the *Woolwich Common Conservation Area*, being classed as a *Grade 1 Site of Borough Importance* (NC8) linked to the adjacent *Grade 1 Site of Charlton Cemetery and Repository Woods* (NC24). Woolwich Common, particularly its freedom to roam which is also established on the Stadium site, forms an important part of London's *Green Chain*, specifically the sections *Charlton Park to Bostall Woods* and *to Oxleas Wood* with three *Points of Interest* situated on Woolwich Common.

Obviously, Woolwich Common and the locality provide amenity to the local, borough-wide and Londoners generally, so much so that a car park in the otherwise undeveloped Stadium site:

- a) would significantly detract from the present amenity value and high quality environment of the locality generally;

It is noted that the LBG *Agenda 21 Strategy* recognises the important role that open spaces play in a sustainable community and for recreation whilst protecting and enhancing the natural habitats such offer – the Applicant's proposal gives no regard to this important community role in that it

- b) fails to recognise value of landscape, biodiversity and open space features in the urban environment.

It is vital that any development within or in close proximity to the *Woolwich Common Conservation Area* should only serve to enhance and/or preserve the character or appearance of a Conservation Area, so the proposed car park

- c) does not respect the setting of the area, it threatens the character of the locality and it is an inappropriate development.¹

Even from casual observation, it is quite obvious from the complete lack of management and care of the Stadium site during the last five or so years,² the Trust (Applicant) has:

- d) not maintained the environmental quality of the Stadium open space; and
- e) neglected to safeguard, improve and enhance the character of the open space so as to encourage full use of the amenity;

so much so, that on its past record of care, maintenance and promotion of the Stadium site, the Applicant has failed to give any cognisance whatsoever to London Borough of Greenwich (LBG) policies (UDP) of SO1, specifically i), ii), iii), SO2 and SO3. Moreover, with its proposal to develop the open Stadium site as a car park, the Applicant has not given heed to SO4 that specifies appropriate uses for parcels of *Metropolitan Open Land*, which does not include for car parks and which would, in our opinion, result in an adverse change to the character of the open land.

Importantly, although the Applicant has failed to properly maintain and manage the open land of the Stadium site over the past five years, it endeavours to turn its own woeful neglect to its advantage in dismissing the Secretary of

¹ The national policy on Conservation Areas is given by PPG15: 'Planning and the Historic Environment' Circular 14/97 which places a requirement on Local Planning Authorities to pay special attention to preserving or enhancing the historic environment.

² See attached photographs

State for the Environment's³ requirement that the site provide alternative environmental benefits for the community in terms of local fauna and flora. It forwards this somewhat disingenuous line of reasoning because, so it claims, there has been no call for its use or protection "*by other users of the Common, nor by environmentalists*"⁴ remaining tacit on the fact that it has never invited any comment or undertaken any form of public consultation of possible alternative uses of the Stadium open space.

In terms of protecting open space and Metropolitan Open Land, the development of part of the Stadium site would be exceptional to the LBG policy O1 in terms that it would result in adverse change to the character of the site, specifically i) and ii); to policy O2 in that the siting and landscaping of a car park would not relate sensitively to the open space and character of the adjacent open space of the Common, specifically i); that it would result in a significant increase in vehicular traffic and it would fragment the site, specifically vi); and that it will infringe upon the role of the Green Chain as defined by policy O4 ii), iii) and iv).

2) LOSS OF EXISTING HABITAT

The proposed development provides for 200 car parking spaces occupying about one-half of the existing 3.5 ha Stadium site with virtually all of this area set to hardstanding in the form of a so-called sustainable urban drainage system (SUDS). However, the net loss of habitat has to be determined in the context of how the Stadium site usage, times of use, noise, lighting, human activity, etc., being factors and interventions that might result a greater actual loss than the unquantified '*limit impact*' postulated in the Ecological Survey.⁵

In a particularly important respect, the Applicant's Ecological Survey is likely to be misleading because during the refurbishment of the hospital (1997-98) the Stadium site was used as a temporary car park, a dump for builder's rubbish and equipment, and it was criss-crossed with hurriedly constructed trenches, being so severely denigrated that (particularly in the absence of any subsequent recovery management by the Applicant over the last five years) left to its own natural processes the site has not yet fully recovered to its natural state.

In fact, the environmental (ecological) impact assessment is somewhat shallow because:

- a) it considers the Stadium area in isolation to the adjoining (integrated) open land of Woolwich Common and gives little regard to fauna, particularly the wide range of bird species,⁶ feeding from Woolwich Common (in the main) in the Stadium area;
- b) it gives no account to the role of the Stadium site acting as a buffer zone between the Stadium/Baker Road (24 hour) human activities and the relatively undisturbed Woolwich Common open land;

³ See Appeal Inquiry (Gummer, 1997 Inquiry) in which the Secretary of State concluded that '*the Stadium should be safeguarded against development as a car park in order that it may continue to offer alternative environmental benefits to the community with ecological advantages in terms of local fauna and flora*'.

⁴ Applicant's Planning Statement of 6 July 2005 para 2, p15

⁵ Ibid, Ecological Assessment, p16

⁶ From our observations over the last 18 years, the Woolwich Common habitat variety ensures that the site supports a wide range of bird species and it is likely that this diversity in the avifauna is mirrored by a diverse invertebrate fauna – this is very much in contrast the Applicant's ecological survey.

Woolwich Common has a very established birdlife with extensive areas of grassland and the wooded blocks and scrub patches providing a range of habitats attractive to a variety of relatively common birds. Birds which regularly breed on the Common include common species such as blackbird, mistle thrush, robin, wren, dunnock, blue tit, great tit, woodpigeon, goldfinch, greenfinch, starling and magpie. Breeding species occurring on the Common which are more reliant on semi-natural open space and, therefore, of more limited distribution in London, include whitethroat, willow warbler, blackcap, skylark, linnet, meadow pipit, long-tailed tit and jay. Other birds that we frequently encounter include kestrel, sparrowhawk, great spotted woodpecker, and in winter, redwing and fieldfare, and we regularly observe two species of owl hunting on the Common. The open space with its varied habitats attracts a wide range of bird species during migration periods, the birds stopping to feed and rest before continuing their journeys with species such as wheatear, whinchat, spotted flycatcher, chiffchaff, lesser whitethroat and garden warbler being seen in most years and we have occasionally seen rarer winter visitors such as stonechat.

Casual observations of butterflies suggest that the Common supports a typical range of grassland species including: meadow brown, common blue, small skipper, large skipper and small copper. Additionally, green veined white, large white, small white, small tortoiseshell, red admiral and speckled wood also occur.

Mammals include fox, grey squirrel, field vole, hedgehog, common shrew and wood mouse and, over the years, we have witnessed common pipistrelle bats (*pipistrellus pipistrellus*) feeding over the mid section of the Common (although the roosts are most probably located in Repository Woods and nearby), and we have come across a number of reptiles and amphibians, including grass snakes and slow worms.

- c) the artificial lighting of the hardstanding areas (which is not at all detailed in the Application but as required by LBG policy E5) could result in a significant intrusion into the redeveloping habitat of the Stadium site; and
- d) the measures offered in mitigation - comprised a few trees here and there, relocation of an area of calcareous habitat and the introduction of a wetland area, albeit such a feature is totally alien to the locality - have not been demonstrated to effectively offset the loss of habitat of the hardstanding development.

The proposed car park development of the Stadium open space is not commensurate with LBG's policies because, as previously stated, it conflicts with the objectives of O1 and O2. Importantly the Applicant seems to have played down the ecological importance of the Stadium open space and its contribution to the ecology of Woolwich Common with which it shares the *Grade 1 Site of Borough Importance* designation and for which there is a presumption against any adverse development as prescribed policy O17. Also, the Applicant's impact assessment has not considered the habitats of the immediately adjacent Woolwich Common open space and if and how these might be adversely affected⁷ as required by O18.

Indeed, the Applicant's impact assessment is fundamentally flawed because no regard is given to the much neglected and denigrated state of the Stadium site, brought about by the hospital construction works and the abject failure of the Applicant itself to maintain and manage the Stadium site over the last five or so years. In effect, the Applicant's ecological impact assessment relates to an abandoned site that is in transition to recovering its natural ecological steady state condition, so that

- e) not surprisingly therefore, that the Applicant's ecological survey reveals a lack of the fauna and flora diversity established on the open spaces of the adjacent Common; and
- f) properly, the survey results should have been extrapolated ahead to reflect the natural condition that the Stadium will attain in time (given the proper care and management).

Indeed, the Applicant's past and present failure to care for and maintain the Stadium site, as required by the Secretary of State,³ casts considerable doubt about the intention of the Applicant to properly manage this site in future (redeveloped or otherwise), there being nothing in the Applicant's Planning Statement pledging that it will put in place and maintain the appropriate management of the remaining Stadium area, as sought by policy O22.

3) TRANSPORT SAFETY OF THE DEVELOPMENT

We are very concerned about the incompleteness of the Applicant's traffic survey, particularly:

- a) traffic observations are drawn from a single day (in February 2005) and compared to the earlier 2004 survey, again for a single day, but in a different quarter – this is statistically very weak and could result in a misleading comparison and erroneous projections;
- b) traffic flow rates and queue lengths for Repository and Charlton Park Roads, feeding into the key Ha Ha/Stadium Road intersection, have not been included in the traffic surveys – this is likely result in an underestimate of the modal peak traffic flows;
- c) the types of vehicles feeding to and from the hospital have not been monitored – this is important in terms of the large commercial vehicles and buses serving the hospital, particularly so for the emergency services (ambulance, police and fire) vehicles, particularly ambulances that are delivering casualties to A&E or ambulances called from the ambulance depot on Shooters Hill ratrunning outwards through Baker/Stadium Roads;

⁷ The Applicant states (para 6, p22) that "*Whilst the survey area forms part of the wider Borough 1 site, in our opinion intrinsically it is of local interest. There will be some loss of habitat as a result of the development but it is planned to translocate the more interesting areas that would be lost to other parts of the site. In addition areas of new habitat will be created. Thus overall, in our view, the impact of the development on ecological receptors will be minor*", although no details of exactly what are the 'more interesting' habitats and where space is to be found for these somewhere on the hospital estate which, as the Applicants put it, "*It is unrealistic to find further parking on the hospital site itself, where all available space is occupied and there is no practical opportunity for rationalisation of the parking or demolition of hospital buildings for car parking*".

- d) the proposal to render the centre section of the Baker/Stadium cross-route '*buses and cycles only*', if at all practicable to enforce,⁸ could result in significant changes in the routing of commercial and emergency services vehicles – no studies seemed to have been undertaken (or at least published in support of the Application) to determine the impact of this effectively diverted traffic on local residences; and
- e) no account seems to have been given to the planned route of the *London Cycle Way* proposal which is planned to run along Stadium and Baker Roads.

Obviously, traffic flow levels are likely to have a marked influence on road safety. The Applicant's proposal requires the introduction of two new interchanges receiving and delivering two-way traffic into and from the Stadium/Baker cross-route. The northerly junction will form a crossroads with the main outpatient delivery via patient ambulances and, the second southerly entrance to the proposed car park cuts across the bus flow into the bus stand and route for vehicles entering the existing car park on the East side of Baker Road. Even with the increased traffic flow and greater number of turns into and out of the Baker/Stadium cross-route, there are no plans to increase the road width, install traffic lights or means of traffic calming in the approaches to these new junctions.⁹

The Application accepts that there will be a nett increase in traffic flows so, in this respect it fails to reduce the impact of pollution and noise from this source, being non-compliant with LBG policy SE2; the failure to analyse traffic flows in Repository and Charlton Park Roads could have bearing on policy E1; vehicles moving in the car park area will interact with the sensitive *Grade 1* open space of Woolwich Common so affecting policy E2; and the siting and design of the proposed car park will require pedestrians crossing of the busy Baker/Stadium cross-route which is heavily used by buses, heavy commercial vehicles, and emergency services vehicles on call. Similarly, cyclists and disabled users of wheelchairs, etc., may find themselves at risk because of the nature of use of the Baker/Stadium cross-route, all generally failing policy D5.

4) INADEQUACIES OF THE APPLICANT'S PLANNING STATEMENT

We find the Applicant's Planning Statement misleading in a number of important details and issues, for example:

- **Transport Strategy, para 1 p1 & 8:** Refers to the Trust's *Transport Strategy* but this does not seem to be a publicly accessible document.
- **Table 1, p2:** States that the QEII hospital has achieved a greater shift of transport mode than that achieved by other hospitals but omits to provide any facts relating to other hospitals to substantiate this claim.
- **Queen Elizabeth Hospital Working Group, para 3, p2:** Refers to consultation with local residents yet we, as near neighbours to the hospital, have never been approached or involved in any consultation exercise.
- **Restrictions on Parking, para 4, p5:** In fact, quite the contrary with the Trust totally reliant upon the good will of the Borough to service the area with traffic wardens. Even so it has taken 5 years of badgering the Trust for it to install simple pavement barriers to inhibit on-pavement parking, with the parking situation becoming so dire and dangerous to pedestrian and disabled users that in or about 2003 LBG issued a public notice to the Trust disclaiming any responsibility for what it considered to be a hazardous situation.
- **Parking Survey and Review, para 3, p9:** This review seems to have been germane to the Applicant's reasoning for the need for redevelopment of the Stadium site and should, therefore, be included in full in the Applicant's Planning Statement.
- **Support for the Development, para 2, p15:** In making the case for the use of the Stadium site the Applicant claims that it has strong support from many quarters, but it does not identify this support.
- **Technical Appraisal, para 3, p16:** This appraisal should be included in full in the Applicant's Planning Statement.

⁸ The previously agreed restrictions to limit ratrunning along the Stadium-Baker cross route never seem to have been upheld by the Applicants.

⁹ Indeed, it might be argued that traffic controls and calming could not be practicably applied to the Baker-Stadium cross-route because of its frequent use by ambulance and other emergency services vehicles responding to emergency calls and 'shouts'.

- **Areas of New Habitat to be Created, para 5, p22:** The Applicant states that in addition to translocation of the *'more interesting areas'* of habitat (whatever that means) *'new areas of habitat will be created'*, but it provides nothing further on where these additional areas are to be located.
- **Scheme Benefits, p29:** A number of benefits are listed to accrue from the car parking development, these are unsubstantiated and mostly defy common sense.
- **Consultations, p7 & 29:** We, as near neighbours have never been consulted by the Trust on this development.

The Applicant claims that the situation has moved forward since the time of the 1997 Secretary of State's decision to safeguard the open land of the Stadium site by then not permitting a car park development. This claim is unproven with the vehicular demand, usage patterns and traffic flows not changing much beyond that predicted ahead in 1997, and with the hospital, as a whole, now operating not much beyond its original design capacity. In other words, in the absence of a significant change in demand there is no greater justification for the car park development now than there was in 1997.

IN CONCLUSION: For the reasons that we have detailed, essentially that the proposed development would result in a change of character and denigration of amenity, loss of natural habitat, and introduce an increased road traffic hazard and further congestion, we strongly urge the Planning Committee to reject the Applicant's proposal to redevelopment this part of Woolwich Common into a car park.

EXAMPLES OF THE NEGLECTED STATE OF THE EXISTING CAR PARKING AREAS

