



## Town Planning

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DX5727 Bromley

Mr Alastair Thornton  
Simply Planning  
25 Manchester Square  
London  
W1U 3PY

4 June 2014

Dear Mr Thornton

**25 Church Road, London SE19 2TE**  
**Change of use from bingo hall (Class D2) to a mixed use comprising both Use Class D1 and Use Class D2**

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I refer to your pre-application submissions dated 14<sup>th</sup> March 2014 and our meeting of 14<sup>th</sup> April 2014.

### Location

The site is located towards the eastern side of Church Road within the Crystal Palace Park Conservation Area. Church Road is mixed in character, at its northern end near the junction with Anerley Hill/Westow Hill/Crystal Palace Parade it takes on a mainly commercial character, with residential flats above shops. Along part of Church Road many of the commercial units are interspersed with residential buildings including larger residential blocks and some semi-detached housing. The site is bounded to the north by a large building which has ground floor commercial use and residential above, to the south it is bounded by a vacant building formerly used as a car showroom which was originally also a cinema. Immediately to the east there is a single lane which provides access to the rear gardens of properties in Patterson Road. To the west on the opposite side of Church Road there are commercial properties within the London Borough of Croydon.

### Proposal

It is proposed to change the use of the building from a bingo hall (Use Class D2) to a mixed use comprising a place of worship (Use Class D1) and uses falling within Use Classes D1 and D2 which may include the following:

- business seminars including start up advice/support
- financial literacy programmes
- young person's events (e.g. career advice and outreach programmes)
- job training / employability guidance
- computer and basic I.T. support
- community advice (i.e. legal issues, debt management, welfare benefits, housing issues, etc.)
- youth empowerment (mentoring, skill training, job search)
- conferences and conventions
- business seminars
- social events (e.g. award ceremonies, cultural events, etc.)
- age support / social schemes

- graduation ceremonies / presentation evenings
- recreational hire of the building for both congregation members and non-congregation members
- family friendly cinema club / live screenings
- health awareness programmes.

The proposal will facilitate the relocation of Kingsway International Christian Centre (KICC) from their main branch church in Wimbledon alongside the provision of church related services. It is anticipated that approximately 400 members will be likely to transfer to services at 25 Church Road. It is intended that there will be a midweek church service and a Sunday service.

### Planning History

Planning permission was refused in December 2009 for change of use of the building from bingo hall (Use Class D2) to church/community use (Class D1) together with ancillary offices, café and bookshop on the following grounds:

'The proposed development, involving the loss of an important entertainment/leisure use within Use Class D2 and the introduction of a mixed use including a place of worship within Use Class D1, would result in a reduction in the range of facilities provided within the town centre detrimental to the proper functioning of the daytime and evening economy and harmful to the social, cultural and economic characteristics of the area, thereby contrary to Policies 3A.18, 3D.1 and 4B.8 of the London Plan.

The nature of the activity associated with a Class D1 use such as a place of worship and the scale of the user means that they are likely to have a wide catchment for its congregation and attract a large number of cars and as a result the development will have a significant adverse impact on the surrounding area in terms of parking demand and pedestrian safety, contrary to Policy T18 of the Unitary Development Plan.'

The application was the subject of an exceptional level of objections. The objections were partly related to a campaign by a local group with aspirations for a cinema use within the building. I would anticipate that a further planning application will attract significant local interest and will be subject to close scrutiny.

### Planning Policies

In determining planning applications, the starting point is the development plan and any other material considerations that are relevant. The adopted development plan in this case includes the Bromley Unitary Development Plan (UDP) (2006) and the London Plan (July 2011). Relevant policies and guidance in the form of the National Planning Policy Framework (NPPF), as well as other guidance and relevant legislation, must also be taken into account.

A consultation on draft Local Plan policies is anticipated early in 2014 and will be a material consideration. The weight attached to the draft policies increasing as the Local Plan process advances.

Relevant UDP policies include the following:

- T1 Transport Demand
- T2 Assessment of Transport Effects

- T3 Parking
- T5 Access for People with Restricted Mobility
- T6 Pedestrians
- T7 Cyclists
- T18 Road Safety
- BE11 Conservation Areas
- L9 Indoor Recreation and Leisure
- S10 Non-Retail Uses in Shopping Areas
- C1 Community Facilities
- C2 Community Facilities and Development

Policy BE11 of the UDP states that proposals for the change of use of buildings within a conservation area will be expected to ensure that the level of activity, traffic, parking services or noise generated by the proposal will not detract from the character or appearance of the area.

Policy C1 states that:

'a proposal for development or change of use that meets an identified health, education, social, faith or other needs of particular communities or areas of the Borough will normally be permitted provided that it is accessible by modes of transport other than the car and accessible to the members of the community it is intended to serve. Planning permission will not be granted for proposals that would lead to the loss of community facilities unless it can be demonstrated that there is no longer a need for them or alternative provision is to be made in an equally accessible location.'

Paragraph 13.9 of the UDP states that the policy:

'seeks to promote the provision of developments that would meet the current and future health, education, faith, social or other needs of particular communities or areas of the Borough. It seeks to ensure that appropriate provision is made of land and buildings to meet the current and future needs of the community generally and of specific community groups. It is recognised that community facilities contribute to the Council's quality of life objectives. Through their diverse roles, including meeting the needs of young people, and ethnic, religious and other groups, community facilities support social inclusion.'

### Use of the Building

In assessing a planning application the planning history will be a relevant material consideration and you are aware that a similar proposal was refused planning permission on the basis of the loss of the D2 use of the building. The refused application proposed a significant number of ancillary and mostly aspirational uses. In order to seek to address this ground of refusal you are proposing a mixed use comprising Class D1 and D2 uses. The use of the building as a place of worship will occur twice a week whilst the remaining components of the mixed use are mostly aspirational at this stage. I suggest that in order to successfully address the previous ground of refusal you should demonstrate that the proposal is not primarily D1 use of the building with a limited, ancillary D2 use. In this respect I suggest that you should advance the D2 components of the use in order that it can be demonstrated that they are likely to become a reality should planning permission be granted, rather than remain aspirational. In this respect I suggest that if you can provide details of expressions of interest from any groups that will be involved in the D2 use of the building then this will be advantageous, as will any other evidence that you can provide



to demonstrate a commitment to the D2 components of the use. Should permission be granted, conditions may be imposed to ensure an appropriate mix of uses.

Any community benefits that can be demonstrated within the proposed mix of uses will weigh in favour of a planning application and it may be advantageous to fully investigate opportunities for community use of the building outside of the church's activities and the uses detailed above. A diversity of proposed uses will assist in addressing the previous ground of refusal regarding the social, cultural and economic impact of the proposal. Uses which will attract a significant footfall will also assist in addressing the previous economic concerns.

### **Technical issues**

#### Highways and Transport

The site is located within a high PTAL (6a) area. A Transport Statement is required to further assess the implications of the proposal. It should cover the existing situation, trip generation, the proposed development and the traffic impact.

The location of the parking and servicing spaces should be shown on the site plan. The plan should clearly illustrate the vehicle access arrangement to these spaces, and any manoeuvring room required.

In order to seek to address the highways ground of refusal you should submit a detailed Transport Statement to demonstrate that the proposal will not result in an adverse impact in highways terms.

Should you have any queries you can contact Nojan Rastani on 0208 313 4524 or [nojan.rastani@bromley.gov.uk](mailto:nojan.rastani@bromley.gov.uk).

### **Conclusion**

Whilst I cannot guarantee success, in my informal opinion a planning application may be worthwhile if it can be robustly demonstrated that the proposal represents a genuine mix of uses falling within Use Classes D1 and D2, and suitable information to address highways concerns can accompany the application. I would expect a considerable number of local objections which will be a material planning consideration.

### **Planning application requirements**

#### Statement of Community Involvement

The Council's adopted Statement of Community Involvement (SCI) strongly encourages applicants for major developments to consult the local community. An SCI is one of the documents included in the Local Requirements (see above). As such, the Council can decline to validate an application that is not accompanied by a statement setting out how the requirements for pre-application consultation have been complied with and demonstrating that the views of the local community have been sought and taken into account in the formulation of development proposals.

We discussed pre-application community consultation at the meeting and you expressed reservations regarding a public event given the opposition to the previous planning application. However, I would suggest that some form of community consultation could be advantageous in terms of promoting the community benefits of the scheme or possibly attracting interest for community uses falling within Use Class D2.

### Application documents

The Council's Local Lists of requirements for planning applications set out material that may be essential for formal consideration of development schemes. These Lists can be seen on the Council's website (with the material about planning application forms, see "Checklist"). At Officer's discretion, the Council can decline to validate an application not accompanied by relevant documents on the Local Lists. I would be happy to discuss the particular requirements for the proposal in this regard. At this stage, I consider it likely that the following should be submitted with the application –

- Design and Access Statement (including disabled access)
- Planning Statement
- Statement of Community Involvement
- Transport Statement
- Travel Plan
- Ventilation/Extraction Statement

See the Department of Communities and Local Government document "Guidance on information requirements and validation" for further information (available on-line at [www.communities.gov.uk](http://www.communities.gov.uk)).

A useful guide to preparing Design and Access Statements is available at: [www.cabe.org.uk/publications/design-and-access-statements](http://www.cabe.org.uk/publications/design-and-access-statements). Also see the guidance on the Bromley Website on "The Council's Local Information Requirements" (available at [www.bromley.gov.uk](http://www.bromley.gov.uk)).

### **Disclaimer and further advice**

#### Disclaimer

You will appreciate that these comments on the proposal are made without prejudice to the determination of an application as each case is determined on its own merits in light of the relevant planning policies of the London Plan, Bromley Unitary Development Plan and any other material land use planning considerations.

Please note that the above advice is based on the written material submitted with your application and at the meeting, and any additional information and/or change to the scheme may alter the planning issues and the Department's response to the proposal. Also it is the case that, on occasions, new issues do arise during processing of a formal planning or other application which could not be identified during the pre-application process.

#### External consultees

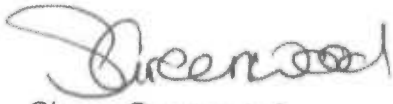
You may wish to contact organisations external to the Council that will be consultees during the processing of a planning application, prior to finalising the proposal for submission for a planning decision. It is the case that consultees may raise issues that cannot be identified during the Council's consideration of a pre-application enquiry.

#### Further advice and meetings

If you require further assistance on this proposal, additional advice or meetings can be arranged for a charge of half the original fee including VAT. You should note that if the proposal is materially different this lower charge will not be applicable.

I hope that the above advice and comments are helpful, and that they summarise the issues that were discussed.

Yours sincerely

A handwritten signature in black ink that reads "Greenwood". The signature is written in a cursive style with a large initial 'G' and a long horizontal stroke at the end.

Simon Greenwood  
Planner  
Development Control West

