

KICC THE OPEN DOOR (KICC)

**25 CHURCH ROAD
LONDON,
SE19 2TE**

**CHANGE OF USE FROM USE CLASS D2 (BINGO HALL)
TO A MIXED-USE COMPRISING USE CLASS D1
AND USE CLASS D2**

SUPPORTING PLANNING STATEMENT

November 2014

SP13-1048

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Documents

Document 1:	Site Location Plan
Document 2:	Decision Notice 09/022022/FULL
Document 3:	Photographs showing internal refurbishment works
Document 4:	Report to Plans Sub-Committee meeting dated 6 th February 2014
Document 5:	Council's written response to pre-application meeting (dated 4 th June 2014)
Document 6:	Simply Planning Limited's representations to emerging Local Plan dated 24 th March 2014

1. Introduction

- 1.1 Simply Planning Limited (SPL) have been instructed by KICC The Open Door (KICC) to submit a planning application for a change of use of 25 Church Road, London, SE19 2TE, from Use Class D2 to a mixed-use comprising Use Class D1 and Use Class D2. The planning application seeks consent for the Church's use of the premises as a place of worship (Use Class D1) whilst allowing for an element of continued D2 use (assembly and leisure) for organisations/groups other than KICC.
- 1.2 The application is a revised application, on behalf of KICC, following the Council's refusal of consent to an earlier planning application (Ref. 09/022022/FULL). This application was refused consent in December 2009 but sought permission for an exclusive D1 use of the building. The Council considered the proposal would:-
- Result in the loss of an important entertainment/leisure use; and
 - Detrimentially impact on the surrounding area in terms of parking demand and pedestrian safety.
- 1.3 Against the background of the previous decision the revised proposals will:-
- Provide a place of worship for local people for which there is a need.
 - Meet the needs of a group (the BME community) who are recognised to experience disadvantage through the land use planning system.
 - Maintain a community use of the building both as a place of worship and importantly, for other non-religious assembly and leisure uses (e.g. concerts, films, conferences etc.)
 - Support the wider economy of Crystal Palace throughout the daytime and into the evening period by hosting activities and events (both religious and non-religious) which would attract footfall to the locality.
 - Not have any detrimental impact on parking demand or pedestrian safety in the vicinity of the site.
- 1.4 Following proactive and ongoing pre-application discussions with the Authority this application is submitted with a view to achieving a compromise situation whereby planning consent can be granted. The principle to the resubmission is that it will maintain the potential for a continued element of D2 use of the building for organisations and community groups other than KICC. This will ensure an important entertainment/leisure venue is maintained for the benefit of the entire community. There is already interest from the community in using the venue and KICC have appointed a Business Development Manager to actively promote outside community hire of the building. Making the building genuinely available to outside organisations forms an important part of KICC's Business Plan for the use of 25 Church Road. It is a potential revenue stream for KICC, the proceeds of which will be reinvested in the upkeep of the building. KICC anticipate that the building will be available for hire to outside organisations for approximately 70% of the building's weekly timetable.
- 1.5 This Statement explains the background to the proposals and concludes planning consent should be granted having regard to the relevant planning policy context and all other material considerations.
- 1.6 The application should be read in conjunction with the following documents which also form part of the submission:-
- Transport Assessment and Travel Plan/Event Management Strategy prepared by Royal Haskoning.
 - Acoustic Reports/Background Noise Mitigation Documents prepared by Bickerdike Allen Partners.

- A Statement of Community Involvement (SCI) as prepared by Forty Shillings.
- Existing architectural drawing package including the following:-
 - Site Location Plan (SP1).
 - Existing Basement Floor Plan.
 - Existing Ground Floor Plan.
 - Existing First Floor Plan.
 - Existing Second Floor Plan.
 - Roof Plan.
 - Fire Escape Plan.

A Design and Access Statement is not required as the proposals relate to a change of use application only.

- 1.7 In the following sections of this report we provide a description of the application site and surrounding area before an explanation of the proposals. Next in **Section 3** we review the planning history to the site before, in **Section 4**, considering the relevant planning policy context. In **Section 5** we discuss the planning issues that are relevant to the proposal before finally drawing our conclusions in **Section 6**.

2. Site Description

2.1 The application site is located within the London Borough of Bromley and forms part of a mixed-use frontage. It is situated to the east of Church Road (A212) some 100m south-west of the junction with Annerley Hill (A214), Crystal Palace Parade (A214) and Westow Hill (A214). A Site Location Plan is provided at **Document 1**.

Document 1

2.2 The application site is located towards the northern end of Church Road and sits within the Crystal Palace Park Conservation Area. Church Road is generally mixed in character. 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 formally used as a car showroom. Immediately to the east of the site there is a narrow lane which provides access to the rear gardens of properties in Patterson Road. To the west, on the opposite site of Church Road, are a number of commercial properties, which fall within the administrative boundary of the London Borough of Croydon.

2.3 The application building is a prominent art-deco former cinema building. It was converted to a bingo hall in 1968 and operated by Gala Bingo until June 2009. It was at this time that the building was purchased by KICC. The building is not statutory listed.

2.4 The building has a gross floor area (GFA) of approximately 1,656m² and capacity of circa 1,150 people.

2.5 The site has a small area of off-street parking and an informal servicing area which is located to the rear of the building. The main pedestrian entrance to the building is from the Church Road frontage. However, there is a secondary access to the rear passageway which is accessed from Milestone Road.

2.6 Vehicular access to the rear service area is via a narrow un-made lane located off Patterson Road and approximately 35m east of the junction with Church Road. This access also serves flats adjacent to the application building along with garages at the rear of existing residential properties fronting Patterson Road.

2.7 The closest public car parks to the site are located at Crystal Palace Park, approximately 500m from the site.

2.8 The location of the building benefits from excellent public transport accessibility and has a PTAL (Public Transport Accessibility Level) rating of 6a. This rating is based on the number of public transport services available within a given area, the time taken to access services, service frequencies and wait times. The site is less than 10 minutes (walking) distance from Crystal Palace rail station which is approximately 635m from the site. The station provides frequent rail services to Central London (London Bridge and Victoria Stations) and Bromley, Orpington as well as to Kent and the South Coast.

2.9 Pedestrian and cycle permeability within the area is also excellent. Church Road (running past the site) forms part of the London Cycle Network Route 23 which runs on a north to south alignment between Camberwell and Croydon where it links up with other network routes. Close to Route 23 at Crystal Palace Park is route 27 which runs from Bromley and beyond to the east. Alternative routes 177 and 20 of the 'London Cycle Network' run from Bromley to the east and Camberwell to the north which further improves cycling facilities/provision within the area.

2.10 Additionally, the application site is well served by local bus services. Bus stops are located on Church Road immediately outside of the property. Further bus services at the Crystal Palace bus station are located along Crystal Palace Parade approximately 200-300m to the north of the site. Regular services link the site with areas including Brixton, Kennington, Central London, Lewisham, Croydon, Morden, Catford, Blackheath, Beckenham, Bromley, Clapham, Streatham and Orpington amongst others. A full appraisal of the application site's accessibility in transportation terms is provided within the comprehensive Transport Assessment, as prepared by Royal Haskoning

and which accompanies the application submission.

- 2.11 In conclusion, the application site is located within an established commercial area close to the centre of Crystal Palace. The location of the site benefits from excellent public transport accessibility and has a PTAL rating of 6a. It is, as such, exactly the type of location to which uses which attract large numbers of people (for example, a church or leisure venue) should be directed. The site is therefore well located to encourage sustainable travel patterns and is an appropriate location for the proposed use.

3. Planning Application History

- 3.1 The application building originally opened its doors in October 1928 and operated as a cinema (The Rialto). Thereafter, it became a Granada Theatre in September 1950. The Building was converted into the Granada Bingo Club in June 1968 and taken over by Gala Bingo during May 1991. Gala operated the building as a Bingo Hall until its closure in June 2009 at which time the building was purchased by KICC.
- 3.2 The application site was therefore previously in use as a bingo hall for a sustained period of time. Consequently, there have been a number of planning applications throughout the years in relation to that previous uses. Those applications largely concern relatively minor works and have no material bearing in the determination of this proposal.
- 3.3 The most relevant planning history in relation to the current application is a previous submission also made by KICC.
- 3.4 The current planning application is essentially a revised submission of an earlier application (LPA Ref. 09/022022/FULL). This was submitted to the Local Planning Authority on 13th August 2009 and sought planning approval for:-

“Change of use from Bingo Hall (Class D2) to church/community use (Class D1) together with ancillary offices, café and bookshop.”

- 3.5 The application was taken to Planning Committee on 17th December 2009 and refused consent for the following (two) reasons:
- 1) **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 3A18, 3D.1 and 4B.8 of the London Plan.**
 - 2) **The nature of the activity associated with a Class D1 use such as a place of worship and the scale of the use 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 significant adverse impact on the surrounding area in terms of parking demand and pedestrian safety contrary to Policy T18 of the Unitary Development Plan.**
- 3.6 The original application was subject to a high level of objections which were primarily related to a campaign by a local group which had aspirations for a cinema use within the building. Such use has not operated from this location since the 1960’s. From our experience, it is not unusual for other organisations or groups to be interested in buildings such as the application site. However, KICC are the owners of the building. The application must therefore be decided on its individual merits and the fact other parties may have aspirations for alternative uses of the building, should it ever become available on the open market again, is of little consequence.
- 3.7 A copy of the Council’s Decision Notice in relation to application (Ref. 09/022022/FULL) appears at **Document 2**. The decision to refuse the original application was made on the casting vote of the Chair.
- Document 2**
- 3.8 The decision was not appealed. Since the time of the refusal KICC have continued to own the building and have gone to considerable expense refurbishing and modernising it. The building now comprises a state-of-the-art main auditorium, meeting rooms, community cafe and internet access hubs in the foyer. Photographs showing the high

standard of internal refurbishment works are shown at **Document 3**.

Document 3

- 3.9 Following refusal of the earlier application (Ref. 09/022022/FULL) the building has not been used as a place of worship. However, KICC have arranged and held a limited number of events all of which fell within the existing D2 Use (assembly and leisure) of the property. Details of these are summarised in the table below:-

Event	Date	Approximate Number of Attendees
Business convention	August 2012	800
Watchnight crossover celebration	December 2012	1,000
Education convention	February 2013	1,000
Musical concert	July 2013	550
Watchnight crossover celebration	December 2013	1,100
Musical concert	July 2014	600

- 3.10 These events resulted in concern being raised by the local community as to whether such activities comprised a material change of use of the premises and questions have been asked as to whether such uses were undertaken in breach of the lawful use of the building. A report taken to the Council's Plans Sub-Committee No. 2 dated 17th October 2013 concluded it was not expedient to take enforcement action regarding any alleged change of use of the application site. However, future use of the premises was to be monitored.
- 3.11 On 6th February 2014 a further report was taken to the Council's Plans Sub-Committee, where the issue of enforcement action was again considered. The advice to Members was (again) unambiguous in that there had not been a material change of use of the building. However, Members resolved to take enforcement action albeit deferring proceedings for 30 days. A copy of this report has been provided at **Document 4**.

Document 4

(a) Pre Application Discussions

- 3.12 Following the deferment of enforcement action a pre-application meeting was held with the Local Planning Authority on Monday 10th March 2014. The intention of our clients to progress a formal change of use planning application for the site was discussed with Senior Officers (including Greg Ullman, John Stephenson, Philip Spiteri and Tony Stewart). Assurances were provided at this meeting that the Council would not proceed to issue enforcement proceedings whilst a revised planning application for the site was being prepared.
- 3.13 Following this strategic meeting and the assurances provided to KICC regarding enforcement matters formal pre-application proceedings commenced with the authority. This included written submissions (dated 14th March 2014) and a follow up meeting with Simon Greenwood (Planning Officer) and John Stephenson (Planning Investigation Officer) on 14th April 2014. The Council's written response to the applicant's pre-application request was received on 4th June 2014. A copy of this correspondence is provided at **Document 5**.

Document 5

- 3.14 KICC and its agents have worked with the Council's Officers through the formal pre-application process and have sought to overcome the areas of concern in relation to the previous reasons for refusal of planning application Ref. 09/022022/FULL. These pre-application discussions have culminated in a revised proposal which, whilst seeking

consent for KICC's use of the premises as a place of worship, will also make the building available to the wider community for various assembly and leisure purposes. The proposals allow for a significant element of continued D2 use (assembly and leisure) activity to take place from the application site. Maintaining a community use of the building both as a place of worship and importantly, for other non-religious assembly and leisure uses seeks to overcome the principal reason of refusal to the previous application.

3.15 In preparing the application it is also important to note that the applicants have sought to proactively engage with the local community and key political stakeholders to hear, understand and react to their previous concerns/objections to the earlier application. This work included a stakeholder preview exhibition held on 9th September 2014, a public exhibition of the proposals on 4th October 2014 and the production of a dedicated project website. The detailed Consultation Strategy is established within the Statement of Community Involvement Report which accompanies the submission. However, it is worth noting the following:-

- 50.82% of respondents agreed that there was a requirement for a multi-use community venue in Crystal Palace.
- 41.67% of respondents supported the regeneration work undertaken at 25 Church Road.

(b) Conclusions on Planning History

3.16 The current application is essentially a revised submission of a previously refused proposal (Ref. 09/022022/FUL) which was taken to Planning Committee on 17th December 2009 and refused consent for two reasons:-

- Loss of an important entertainment/leisure use.
- Adverse transport impact given the scale of use.

3.17 Taking these two previous reasons for refusal in turn it is important to note the following:-

- The revised application proposals seek consent for a mixed-use of the building (D1/D2 use) which will allow an appropriate and viable use of the building (as a place of worship) whilst also maintaining a continued assembly and leisure use. The planning history has demonstrated the building has not been used as a cinema since the late 1960's after which it became a bingo hall. Given the rise in popularity of online bingo/gambling this use underperformed for many years and the building suffered from a prolonged lack of investment. Towards the end of Gala's ownership use of the building was low. A cinema use has not occurred for in excess of 45 years from this location. It is in this context that any objection on the basis of a loss of a leisure/entertainment use should be set. In contrast by ensuring the building is available to outside organisations/groups for a range of community activities and events, delivers a genuine benefit to the immediate local community.
- The submitted Transport Assessment demonstrates the development site is well located to encourage sustainable travel patterns and will not result in a significant adverse impact on the surrounding area. Furthermore, a review of the planning history has shown that the application building was designed and built to accommodate large capacity events on a regular basis and maintains the capacity to accommodate events of up to approximately 1,100 people. Importantly, events which fall within the lawful use of the building (i.e. D2) and which attract significant numbers of people can currently operate from the building without the need for planning consent. This is an important point which must not be underestimated.

4. Planning Policy

4.1 This section of the Planning Statement outlines the principal national and development plan policies that are relevant to the determination of the application proposals. The relevant policies, along with their significance in determining the application, are discussed in turn below.

(a) National Planning Policy Framework

4.2 The NPPF was adopted in March 2012. It is a significant material consideration in the determination of all planning applications.

4.3 At the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 7 explains that there are three dimensions to sustainable development; namely economic, social and environmental. Expanding on these dimensions to sustainable development, paragraph 7 continues by explaining:-

- ***“An economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; by identifying and co-ordinating development requirements, including the provision of infrastructure;***
- ***A social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the communities needs and support its health, social and cultural wellbeing; and***
- ***An environmental role – contributing to protecting and enhancing our natural, built and historic environment; and as part of this, helping to improve biodiversity, use natural resources prudently, minimising ways to pollution and adapt to climate change including moving to a low carbon economy.”***

4.4 In the context of this guidance the application proposals perform against each of the three dimensions to sustainable development. The proposals deliver economic development and in doing so help, albeit it in a complementary way, to achieve a strong and responsive economy. Use of the building as both a place of worship and wider community use will result in job creation to the benefit of the local area. In its latter years the previous use employed just 4 full-time staff. Secondly, the proposals perform a social role through ensuring the local community has access to a range of cultural, religious and leisure activities within a fit-for-purpose multi-use building. Thirdly, they perform an environmental role ensuring an important attractive building is protected and enhanced for the benefit and enjoyment of future generations.

4.5 In this way, the proposals are consistent with all three of the overarching dimensions of sustainable economic development as contained within the NPPF.

4.6 Paragraph 14 of the NPPF establishes the Government’s support and presumption in favour of sustainable development and indicates that:-

“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as the golden thread running through both plan making and decision taking...”

For decision taking this means:

Approving development proposals that accord with the Development Plan without delay; and

Where the Development Plan is absent, silent or relevant policies are out of date, granting planning permission unless:

Any adverse impacts in doing so would significantly or demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole;

Specific policies in this framework indicate that development should be resisted.”

4.7 As we will go on to show, the application proposals are consistent with the relevant policies of the Development Plan. As such, consistent with the above advice, planning consent should be granted without delay. Put another way, if the proposal is to be restricted it is necessary to show, we say in unambiguous terms, that there is clear conflict with adopted policies of the statutory Development Plan. Mere opposition to a proposal by local residents or pressure groups is not, of itself, a reason to refuse planning consent within the terms of the NPPF.

4.8 The NPPF continues at Paragraph 17 to establish twelve core principles which should guide planning. In the context of these proposals, the following are particularly relevant:-

“Promote mixed-use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production);

“Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.”

Take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.”

4.9 Applied to these application proposals, they will:-

- Provide for a mixed-use of the application building. The proposals will maximise the use of this highly accessible site, help minimise journeys travelled and deliver a mixed-use of the building to the benefit of the local community.
- Improve the community’s access to cultural services whilst meeting an identified local need for a place of worship.
- Deliver an appropriate and viable use of the former Bingo Hall which has remained underutilised for a sustained period and is currently of little benefit in both social and economic terms to the local area and businesses.
- Provide an opportunity to refurbish and ensure the long-term maintenance of an important community building.

4.10 Paragraph 19 of the NPPF reiterates that planning should operate to encourage and not act as an impediment to sustainable growth. Therefore, significant weight should be placed on the need to support economic growth through the planning system. The benefit of the proposals in ensuring the building is made available as a wider resource and the resultant job creation should not be underestimated.

- 4.11 The NPPF also seeks to ensure that planning policies seek to promote competitive town centre environments. Leisure, community and cultural uses are all considered to make an important contribution to the vitality of centres. The proposals will bring increased footfall to this location. That can only be a significant economic benefit to the surrounding area and in particular the nearby shops and businesses.
- 4.12 Paragraph 34 of the NPPF expects developments that have the potential to generate significant movements to be located where the need to travel will be duly minimised and the use of sustainable transport modes can be maximised. The application site is exactly the sort of location to which development of the scale and type proposed should be directed. It is highly accessible as evidenced by its PTAL rating of 6A.
- 4.13 Section 8 of the NPPF relates to promoting healthy communities. Paragraph 69 encourages planning policies and planning decisions to achieve places which promote:

“Opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed use developments, strong neighbourhood centres and active street frontages which bring together those who work, live and play in the vicinity”

- 4.14 The proposals clearly deliver against these objectives of the NPPF.
- 4.15 Paragraph 70 of the NPPF continues by stating that in order to deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:
- Plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;
 - Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs.
 - Ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable and retained for the benefit of the community; and
 - Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.
- 4.16 The NPPF therefore actively encourages local authorities to plan positively for community facilities, and not put barriers to provision in place. The proposals, through the sustainable co-location of important community facilities go to the heart of what the NPPF is trying to achieve. The mixed use proposals whilst retaining an existing building within a valued community use will also deliver additional provision in the form of a place of worship. The proposals represent the best hope for the building being used regularly for entertainment, and, of regularly being accessed by a diverse range of people in the community. The co-location of the community uses ensure the building will most likely be enjoyed by a larger section of the population in addition to the Church’s congregation. It is a proposal which is about the development and modernisation of an existing community building to better meet the community’s needs. The proposals are fully in accordance with the principles established through the NPPF.
- 4.17 With regards to general decision taking paragraphs 186 and 187 of the NPPF are notable in that they require local authorities to take a positive approach to decision taking. They should look for solutions as opposed to problems. Decision takers should seek to approve applications for sustainable development wherever possible and should endeavour to work proactively with applicants to secure proposals that improve the economic, social and

environmental conditions of the area. This is all highly relevant to the application proposals. The Council should be looking at ways to grant consent to the proposal, not resist it.

- 4.18 The NPPF emphasises the importance of undertaking pre-application discussions (paragraph 188). The guidance states that, *'early engagement has the potential to improve the efficiency and effectiveness of the planning system for all parties'* and that *'good quality pre-application discussion enables better co-ordination between public and private resources and improved outcomes for the community'*.
- 4.19 The guidance continues (paragraph 190) by stating that *'the more issues that can be resolved at pre-application stage then the greater the benefits'*.
- 4.20 Following refusal of planning consent 09/022022/FULL, discussions have taken place between KICC, their agents, officers of the LPA and the local community. These revised proposals are the culmination of those discussions and seek to overcome the Council's previous concerns by delivering a mixed use development which will genuinely ensure the wider community has access to the building to a range of events.
- 4.21 The NPPF advises that the Development Plan remains the starting point for decision taking. However, in accordance with paragraph 215, policies must be given due weight according to their degree of consistency with policies of the NPPF. At this stage it is important to remark that the NPPF was not adopted at the time of the original refusal. It is therefore a very significant material consideration that post-dates the previous decision and which should carry considerable weight.

(b) Development Plan Policy

- 4.22 The statutory Development Plan for the application site comprises The London Plan: Spatial Development Strategy for Greater London (July 2011) alongside those saved policies of the Bromley Unitary Development Plan (UDP) 2006. Each of these documents are dealt with in turn below.

(i) The London Plan: Spatial Development Strategy for Greater London (July 2011)

- 4.23 The London Plan is the overall strategic plan for London and sets out an integrated economic, environmental, transport and social framework for the development of London up to 2031.
- 4.24 The London Plan is principally of a strategic nature; however, Policy 3.16 is relevant. This policy is concerned with the protection and enhancement of social infrastructure and states:-

"London requires additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population."

- 4.25 Against this background, the policy then goes on to state that, in the context of planning decisions:-

"Development proposals which provide high quality social infrastructure will be supported in light of the local and strategic needs assessments. Proposals which would result in the loss of social infrastructure in areas of defined need for that type of social infrastructure, without realistic proposals for re-provision should be resisted ..."

"Facilities should be accessible to all sections of the community (including disabled or older people) and be located within easy reach by walking, cycling and public transport. Wherever possible, the multi-use of premises should be encouraged."

- 4.26 The supporting text to the policy (paragraph 3.86) identifies that places of worship are one component of social infrastructure to which Policy 3.16 applies. Having regard to this policy, it should be noted of the application proposals that:-
- They will provide a new high quality facility for social infrastructure and comprise significant investment in an existing community building.
 - They will meet an identified local need for a place of worship.
 - They will be accessible to all including both the disabled and the elderly.
 - They will enable and support a mixed-use of the building for both religious and assembly and leisure purposes.
 - They are in a highly accessible location which benefits from a choice of means of travel including public transport, cycling and walking. Indeed, the site has a PTAL rating of 6a. It is exactly the sort of location to which development of the scale and nature proposed should be directed.
- 4.27 In short, when assessed against Policy 3.16 of the London Plan the proposals are wholly in accordance with its provisions. They involve a social infrastructure reuse of a former bingo hall in an established town centre location which benefits from excellent access to public transport facilities. The presence of an active community use, described fully at Section 5, would be of significant benefit to the local economy and serve to act as a catalyst for the locality's ongoing regeneration.
- 4.28 In short, the application proposals fully comply with Policy 3.16. They will significantly enhance social infrastructure within the Borough owing to KICC's willingness to allow and support a mixed-use of the building (discussed further within Section 5).
- 4.29 Policy 6.13 relates to car parking provision and the need to strike an appropriate balance between promoting new development and preventing excessive car parking provision. Whilst this policy introduces a number of parking standards it also recognises that in locations with high public transport accessibility car free developments should be encouraged. The application proposals benefit from excellent public transport accessibility and consequently will not conflict with this policy aspiration.
- (ii) Bromley Unitary Development Plan (2006)
- 4.30 Bromley UDP was adopted on 20th July 2006. The majority of the policies within the UDP remain saved until their subsequent replacement by policies contained within the Council's emerging Local Plan. Until the new Local Plan is formally adopted saved policies of the UDP remain pertinent alongside the NPPF. The Council is required to give due weight to the UDP (2006) in accordance with the degree and consistency that it has with the NPPF.
- 4.31 In relation to community facilities the Strategic Objective of the Council is to:-
- Work in conjunction/partnership with the relevant agencies to secure the provision of accessible, good quality facilities to meet the health, educational, faith, social service and other essential needs of the community.
 - To support providers in maintaining and enhancing the availability and accessibility of a wide range of community facilities, which contribute to the quality of life of the Borough's population.
- 4.32 Paragraph 3.12 recognises that community facilities, including places of worship, contribute towards the overall provision of the Borough's social infrastructure. Through the UDP the Council seek to actively encourage the maintenance and development of an accessible range of services and activities alongside the provision of essential

services. The proposals, through the co-location of important community facilities, are consistent with the overarching strategic objectives of the adopted UDP.

- 4.33 Policy BE1 of the UDP is a general design related policy which expects all development proposals to “*be of a high standard of design and layout*”. Delivering high quality and well-designed schemes is therefore an important consideration of all development proposals. KICC’s work restoring and refurbishing the existing building has been of the highest quality. There are no design concerns in relation to the application proposal.
- 4.34 UDP Policy BE2 concerns mixed use developments and sets out the Council’s aspirations that in appropriate cases development proposals which incorporate a mix of land uses are to be encouraged. Through the sustainable co-location of important community facilities this policy requirement is met. Indeed, without being allied to the Church’s use, some other leisure uses would be unviable at this location (as they have proven to be through the planning history to the site). It is only through the proposed Church use, as part of a mixed-use scheme, that components of continued leisure use can be adequately supported at this location.
- 4.35 Policy BE11 states that proposals for the change of use of buildings within an Conservation Area will be expected to:-
- Respect or complement the layout, scale, form and materials of existing buildings and spaces;
 - Respect and incorporate in the design existing landscape or other features that contribute to the character, appearance or historic value of the area; and
 - Ensure that the level of activity, traffic, parking services, or noises generated by the proposal do not detract from the character and appearance of the area.
- 4.36 Whilst the application site falls within the Crystal Palace Park Conservation Area the proposals will not conflict with Policy BE11. We say this for the following reasons:
- Fully contained within the existing building, the proposals will have no detrimental impact on the existing character of the Conservation Area (including layout, scale, format and materials). On the contrary, by securing the high quality refurbishment of the building and its ongoing use the proposals can only serve to enhance the character and appearance of the conservation area.
 - It is our clients’ intention to progress a planning application for the improvement of existing open space at the front of the application site as well as refurbish the façade at the building. These additional proposals will contribute positively to the character of the Conservation Area.
 - As the accompanying Transport Assessment demonstrates the proposals will not result in a level of traffic or activity that will detract from the Conservation Area. Rather, to the contrary they will bring increased activity and footfall to this part of the centre which will be of economic benefit to the locality.
- 4.37 Arguably, the most relevant UDP policy in relation to the application proposal is that of C1. This relates specifically to community facilities and states that:-

“A proposal for development or change of use that meets an identified health, education, social, faith or other need 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.”

4.38 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.”

4.39 The policy is of particular significance in that it specifically encourages the provision of community facilities such as those proposed through the application. Indeed, the policy actively supports proposals where they meet the needs of faith communities within the Borough. The application proposals go directly towards improving access by a faith group to a place of worship whilst maintaining an important and wider community use of the building.

4.40 By providing a community and leisure facility the application proposals will make a valued contribution to the diversity, vitality and future viability of the area and will help to achieve the Council’s regeneration aspirations for this part of the borough. Furthermore, through the sustainable co-location of community and leisure facilities there will be no loss of existing community facilities at this location. Rather, the proposals will deliver much improved community use to the area and will allow a wide range of community groups and organisations to make use of the existing underutilised building.

4.41 Policy C2 relates to Community Facilities and Development and states the following:

“The Council will seek to ensure that development proposals take appropriate account of community needs, and will seek appropriate facilities to meet those needs in all developments.”

4.42 Whilst not directly related to change of use proposals the policy is notable in that it encourages proposals to take account of the community’s needs for increased provision. The co-location of important community facilities, which these proposals will deliver, is fully consistent with the objectives of Policy C2 and will deliver against wider community needs both within and outside the Church.

4.43 The Council’s transport policies are established at Chapter 5 of the UDP. Policy T1 relates to transport demand and directs development proposals which are likely to be significant generators of travel to the most accessible locations within the Borough. The application site benefits from a PTAL rating of 6A and is exactly the sort of location where development of the scale and nature proposed should be directed. The policy presents a matrix to be used as an assessment tool with regards to the acceptability of development proposals when considering a site’s PTAL rating. The application proposals, as a development which has the potential to attract large numbers of people, fully accords with the principle of this policy (i.e. it is located within an area where access to public transport is greatest).

4.44 Policy T2 sets out the Council’s requirements for applications that are likely to prove significant generators of travel to be accompanied by a Transport Assessment. Applicants are also expected to enter into agreements to draw up and implement Travel Plans. Royal Haskoning DHV, on behalf of KICC, have prepared both a Transport Assessment and Travel Plan that is submitted in support of the proposals and should be read in conjunction with this Planning Statement. This has been prepared through proactive pre-application discussions with the Highways Authority. The main conclusions drawn through the Transport Assessment can be summarised as follows:-

- The development site is well located to encourage sustainable travel patterns and will not result in a

significant impact on the transport network.

- Development fully accords with transport policy published at a national level within the NPPF.
- Development also accords with Development Control policy on the integration of transport and land use planning as outlined in the London Plan.
- The site has an excellent level of non-car accessibility and development will not result in a material impact on the highway network.
- The proposed mixed-use will be no more onerous in terms of travel demand than the existing lawful use of the site.
- Development accords well with policies within the adopted Unitary Development Plan which require major development proposals that generate or attract large numbers of trips to be located in areas with good public transport accessibility (i.e. the application site).
- The development is considered acceptable in transport terms.

4.45 Policy T18 relates to road safety and states the following:

“In determining planning applications, the Council will consider as appropriate the potential impact on road safety and will seek to ensure road safety is not adversely affected.”

4.46 This policy formed the basis for one of the reasons for refusal of the previous application (09/022022/FULL). The Council at that time considered the nature of activity associated with a Class D1 use was likely to have a wide catchment for its congregation thereby attracting a large number of cars. As a result the proposals were considered to have an adverse impact on the surrounding area in terms of parking demand and pedestrian safety and deemed contrary to this particular policy.

4.47 In relation to this policy it is important to make the following observations:-

- The scale of the revised application proposals is entirely appropriate to this location. Indeed, given the proposals will attract significant numbers of people it would be less appropriate to direct the proposals to other lesser accessible locations. Moreover, the building is of a scale that can accommodate the proposed use. The building has a long history of accommodating significant numbers of people whether in its first use as a cinema or more lately as a bingo hall. Such uses would have also drawn upon a ‘wide catchment’ in their own right.
- The site is a highly accessible location and benefits from a PTAL rating of 6a. There are residential areas within close proximity from which people can walk to services or events should they wish. The closest bus stops are located immediately opposite the site on Church Road. Crystal Palace Station is also situated a short walk away.
- The building has a long history of hosting events which attract large numbers of people (including in the evenings) and this has taken place without unacceptable impact on residential amenity.
- Use of the building for large events can be managed in such a way to ensure there will be no detriment to pedestrian safety. This is confirmed within the submitted Transport Assessment.
- There are a number of car parks in close proximity to the site (e.g. Crystal Palace Park and National Sports

Centre) where those travelling by car will be able to park. Parking provision is discussed in greater detail within the submitted Transport Assessment.

- The planning application is accompanied by a Travel Plan, which will incorporate a range of sustainable transport initiatives and event management measures the purpose of which will be to encourage people to use non-car modes of travel. This is likely to comprise:-
 - Appointing a Travel Plan Co-ordinator, who will be responsible for promoting sustainable travel to/from the site.
 - A designated person responsible for organising/co-ordinating larger events (e.g. arranging additional transport, providing information on travel, co-ordinating and liaising with Crystal Palace Park, etc.).
 - Provision of a minibus collection service for congregational members.
 - Formulating agreements with local car park owners/managers to ensure parking is available for large events.
- Minibuses are to be made available by KICC for the transport of visitors to the site before and after the Church services. The minibuses will be able to make alternative trips, generally serving areas of South London that do not have readily available direct connections with Crystal Palace.
- National planning policy directs proposals which have potential to generate significant movements to exactly the type of location as the application site.

4.48 Policy S10 concerns Non-Retail uses within shopping areas and states that within retail frontages the Council will not normally permit uses that do not offer a service to visitors unless:

- there has been long term vacancy and a lack of demand for a retail or service use can be proven; and
- the proposed use is in premises where it would not undermine the retail viability of the centre.

4.49 This policy is of limited relevance to the application proposals as the building has always been within a leisure use and the proposals seek to promote the building as a multi-use site. Furthermore, national and emerging local planning policy recognises the benefit of delivering community uses within or adjacent to town centres as a means of complementing the wider retail functioning of such areas. The proposals will generate a high level of footfall to what is a peripheral area of an established centre. They will not undermine the retail function of the centre but will substantially contribute to the area's wider regeneration and economic well-being.

(iii) Emerging Local Plan

4.50 In 2012 the Council decided to progress a new Local Plan in line with the NPPF (March 2012) as opposed to continue with their Local Development Framework. The document is a material consideration. However, given the infancy of the document, the weight to be afforded to its policies is limited.

4.51 The Council's new Local Plan will set out the vision and objectives for the Borough up to 2030 alongside the strategic and more detailed policies that will be used in determining planning applications. A Draft Policies and Designations document was published for consultation during February 2014. On behalf of KICC, representations were submitted by SPL to this document, a copy of which is provided at **Document 6**.

- 4.52 The fourth objective of the emerging Local Plan in relation to health and wellbeing seeks to:-
- Ensure new community facilities are appropriately located to provide accessible, effective and modern services, and resist the net loss of facilities.
- 4.53 In the context of this emerging objective it should be acknowledged that the borough’s identified centres are appropriate locations to which community facilities, such as this, should be directed. The proposed use of the application property as both a place of worship and important community leisure use would be wholly consistent with this objective. Its use would attract a large number of people and it is right and proper that it be located within an appropriate location (i.e. edge of district centre).
- 4.54 The 2nd objective of the emerging Local Plan relates to town centres and seeks to:-
- Encourage a diverse offer in town centres, including shops and markets, services, leisure and cultural facilities as well as homes.
- 4.55 A mixed use of the application building for both religious and community facilities would also deliver against this emerging policy objective.
- 4.56 Emerging draft policy 6.1 relates specifically to Community Facilities and outlines the Council’s emerging aspiration to promote, enhance and retain community facilities (including places of worship) in order to promote the quality of life and the health and wellbeing of those living and working in the Borough.
- 4.57 The draft policy also encourages developments which meet an identified need for such community facilities to be located to maximise accessibility. The application proposals do just this.
- 4.58 Paragraph 3 of proposed policy 6.1 states that:
- “Planning permission will not be granted for proposals that would lead to the loss of community facilities, unless alternative enhanced provision is to be made in an equally accessible location for the community it serves, or it can be demonstrated that there is no longer a need for them or other forms of social infrastructure.”***
- 4.59 The policy builds upon 3.16 of the London Plan which concerns the protection and enhancement of social infrastructure and comments: ***“London requires additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population”***. Against this background, the policy then goes on to state that:-
- “Development proposals which provide high quality social infrastructure will be supported in light of local and strategic social infrastructure needs assessments. Proposals which would result in a loss of social infrastructure in areas of defined need for that type of social infrastructure, without realistic proposals for re-provision should be resisted.”***
- 4.60 Importantly, in the supporting text to Policy 3.16 of the London Plan paragraph 3.89 states that:
- “Existing or new developments should, wherever possible, extend the use of facilities to serve the wider community, especially within regeneration and other major development schemes. Shared and extended use of facilities, including those of schools, commercial and community based organisations can help ensure the effective use of resources and land, encourage joined up and coherent service delivery and shared maintenance and management costs. It can also help minimise travel distances for users and encourage community participation and inclusion.”***

- 4.61 Crucially, wherever possible the multi-use of premises is actively encouraged through the London Plan. Emerging Policy 6.1 is therefore far too prescriptive. Fundamentally, and of particular importance in relation to the application proposals, it fails to recognise the multi-use of premises and the ability of such schemes in ensuring the maximum potential for future use of important buildings within the Borough. The proposals will not result in a ‘net loss’ of community facilities but will rather make best use of an existing and under-utilised community building. There is no conflict with emerging Policy 6.1.
- 4.62 In terms of the emerging plan our clients submitted representations objecting in the strongest possible terms to the final paragraph of emerging policy 6.1. This states that, in respect of facilities identified by local communities as having significant value, planning permission for alternative uses will only be considered where it can be demonstrated that no prospective purchasers exist that would be willing to pay both a suitable price and maintain the existing use. The wording of this policy goes far beyond the limitations placed upon the operation of the Assets of Community Value Scheme as provided through the Localism Act (2011) and Assets of Community Value (England) Regulations 2012.
- 4.63 As a result the wording of this policy is, in our opinion, unduly prescriptive. It does not distinguish between appropriate planning applications (i.e. mixed use schemes retaining an element of community uses could be acceptable). It also fails to recognise cases where the previous use of a building is unviable and that new schemes (including co-location of facilities and mixed use schemes) may be of equal if not increased benefit to the local community. Given these criticisms of the policy and its infancy, little or, we say, no weight should be given to this part of the policy.
- 4.64 Emerging Policy 6.2 relates to opportunities for Community Facilities. It establishes the Council’s intention to support the maximisation of opportunities for the enhancement or the creation of social infrastructure, to address the needs of existing and future residents of all ages, particularly in renewal areas and more accessible locations such as retail centres and existing retail frontages. The policy establishes a number of criteria which will be used to ensure opportunities for community facilities are duly maximised. These include:-
- (i) Allowing the temporary use of vacant buildings as community facilities.
 - (ii) Enabling community uses in town and district secondary frontages, neighbourhood local centres and local shopping parades.
 - (iii) Encouraging the development of community “hubs” providing a range of social infrastructure on accessible existing community sites or in local centres or within new major developments.
 - (iv) Supporting the provision and enhancement of sports and recreational facilities, especially where there are recognised deficiencies or where they present a tool for renewal and regeneration.
 - (v) Encouraging the cultural and leisure use of the public realm.
- 4.65 The emerging policy actively encourages the development of community “hubs” – or the provision of a range of social infrastructure on accessible existing community sites. Through the sustainable co-location of important community facilities our client’s proposals deliver against these emerging policy objectives and aspirations.
- (v) Conclusions on Planning Policy
- 4.66 Overall, KICC’s use of the building will:-
- Provide social infrastructure that meets the needs of London’s growing and diverse population, consistent with London Plan Policy 3.16.

- Deliver a high quality and refurbished building consistent with UDP Policy BE1.
- Provide for the sustainable co-location of community and leisure facilities (encouraged through UDP Policy BE2).
- Meet an identified need of a faith group which faces disadvantage through the planning system.
- Maintain the building for the benefit of the community ensuring there is no loss of existing community facilities at this location (consistent with UDP Policy C1) and emerging Local Plan policies).

4.67 In short, the proposals are wholly in accordance with the provisions of the Statutory Development Plan and consistent with paragraph 14 of the NPPF, should be granted consent without delay.

5. Use of the Building

5.1 The application proposal seeks to obtain planning consent for the following:-

“Change of use from Use Class D2 (bingo hall) to a mixed use comprising Use Class D1 and Use Class D2.”

5.2 The first use of the application site will be as a place of worship. However, in addition, KICC, wish to allow continued leisure and assembly (Class D2) use of the building at those times when it is not in use for church activities. In this way maximum community access to the building will be ensured. It is proposed that the building will be made available for the community (including outside organisations/groups) for approximately 70% of the time.

5.3 When considering the use of the building in detail the previously refused planning application (Ref 09/022022/FUL) is a material consideration. As we have considered in Section 3 this earlier application was refused planning consent on the basis of the loss of the D2 use of the building. In order to seek to address this particular ground of refusal the revised application proposals now provide a mixed use of the building comprising both Class D1 and D2 uses. The detail of how the building will be used by both KICC alongside local community groups is considered below.

(a) **KICC**

5.4 KICC is an independent inter-denomination church and community organisation founded in 1992. The organisation encourages its members to strive for excellence in all areas of their life through education and self-improvement. Their main venue for Church services for its South London congregation currently take place at the Open Door Community Centre located at Keevil Drive, Wimbledon, SW19 6TF.

5.5 KICC currently attract average congregation sizes of approximately 120 people to weekday evening services (Tuesday 6.30pm) and 400 people on Sundays. The existing community centre has an approximate capacity of 250 persons and consequently, two services are currently held on a Sunday (9.00am and 11.00am).

5.6 KICC have operated as a church from the Open Door Community Centre for nearly 20 years. The Open Door Community centre is a public facility that is run by Wandsworth Council.

5.7 KICC wish to relocate some Church services to more fit-for-purpose accommodation at Church Road. This will help to cater for the Church’s congregation which currently stands at a total of 450 members split across a total of 2 services operating from Keevil Drive and also provide a valuable facility for new members within the existing local area.

5.8 The benefit of operating from 25 Church Road will enable KICC to own their own premises whilst affording greater flexibility and control in terms of delivering wider community facilities. By only having lease on their current premises, KICC are restricted in terms of the ancillary activities which can be encouraged alongside the church. By owning and managing their own building KICC will be able to actively encourage community use of the property at those times when it is not being used for church related activities.

5.9 KICC are committed to retain regular church services at Keevil Drive in order to serve the immediate local community to that location and maintain a presence within Wimbledon. KICC will continue to operate services from Keevil Drive indefinitely in parallel with Church Road. Therefore, only a proportion of the congregation will ‘transfer’ to Church Road. At this stage the congregation remaining at Keevil Drive is expected to total circa 50 members.

5.10 Service times will take place from the application site at the following times:-

- Sunday 9am – 11.30am (expected congregation size – 350-400).
- Tuesday 18.00pm – 21.00pm (expected congregation size 150-250).

5.11 As the above shows, the application proposes that two weekly church services will take place from no. 25 Church Road; a Sunday morning service and a weekday evening service. In addition, KICC will use the building at some other times for activities such as choir practice, etc. The remainder of the time the building will be made available to wider community groups and organisations.

5.12 In addition to church services, KICC will also provide counselling, training and personal development programmes.

5.13 The building will also be used by KICC for a range of other activities and community uses in addition to its primary use as a place of worship. A number of the other activities and events will be run by KICC members themselves. At present, KICC already provides at Keevil Drive the following community uses:-

- Children's/Kids Clubs.
- Teenage/Youth Club.
- Community Outreach programmes.

5.14 Similar but expanded programmes are proposed for the Church Road facility which will operate alongside the Church's use). For example, KICC are considering running the following types of programmes for courses at Crystal Palace:-

Activity or Group	Description	Frequency of Meeting
Older People	Coffee mornings, Basic Computer Skills course.	As required
Advice Centre	Advice for the general public on legal issues, debt management, welfare benefits, housing issues.	As required
Youth Empowerment/Development	Mentoring, skill training, job search, career development.	As required
Music Academy	Music theory and instrument training.	As required
Media	TV and radio broadcasting and training.	As required
Café	Café opening all day serving pastries, coffee, tea, drinks, etc.	As required
Conferences and Conventions	Academic, political, business, etc.	As required
Graduation Ceremonies	Local institutions.	As required
Business Seminar	Exhibition, seminars, etc.	As required
Social Events	Award ceremonies, cultural events, etc.	As required
Educational Activities	School events, presentation evenings, etc.	As required
Musical Concerts	Religious musical concerts.	As required
Choir Practice	Local groups including those not affiliated to church.	As required
Counselling	Including family and marriage guidance.	As required

5.15 These programmes would be open to the church's congregation and importantly any other members of the community who wish to attend. Given the ethnic characteristics of the church's congregation (predominately members of the BME community) these services will primarily be used by groups who, in terms of the Equality Act 2010, have protected characteristics. Moreover, they are part of a group (BME community) who are acknowledged to face disadvantage through the land use planning system.

5.16 In terms of KICC's use therefore, it will:-

- Provide social infrastructure that meets the needs of London's growing and diverse population (London Plan Policy 3.16).
- Meet the needs of a group (the BME community) who are recognised to experience disadvantage through the land use planning system.
- Maintain a community use of the building both as a place of worship and importantly, for other non-religious assembly and leisure uses.

(b) An Assembly and Leisure Use of the Building

5.17 The application proposes a mixed use of the building. So in addition to its use for religious and related activities/purposes, KICC will also make the building available for wider community use. This approach will ensure that an element of D2 uses (assembly and leisure) continue to operate from the site. As this stage KICC anticipate the building being put to such uses as the following:-

- Conferences
- Musical Conferences
- Graduation ceremonies/Presentation evenings
- Business seminars
- Political conventions
- General open days
- Christening/parties, including both congregation members and non-congregation members
- Live screenings
- Classic cinema.
- General Community hire

5.18 Availability of the premises to outside organisations and groups will be made known through advertising in the local press (including Bromley Times, Croydon Guardian and Beckenham Gazette) along with on-site advertising on the external poster boards and foyer banner. A dedicated website has also been developed which will enable the community to find out further information about the schedule of community activities within the building. A facility will also be provided where they will be able to hire the building (or parts of) through the website resource. Screenshots of the website have been appended to the Statement of Community Involvement, which accompanies the application submission.

5.19 Whilst a charge would be made to outside organisations for hire of the application building this would be consistent with other comparable facilities that are available for hire within the borough. KICC also propose to introduce a range of community discounts/incentives to local organisations and groups interested in hiring the building.

5.20 KICC have also appointed a Business Development/Events officer whose sole responsibility is to manage the use of the building by outside organisations. The role is tasked with generating interest in the building from community

groups and ensuring both D1 and D2 use of the building operates efficiently. Careful thought has gone into the mechanisms of how the building will be used for D2 purposes and KICC have prepared a business plan which shows how external use of the building and co-location of community resources is integral to the upkeep and maintenance of the building from a financial perspective. Clearly, enabling the building to be available for wider community groups is in the interest of the church. Put simply, it will generate income thus helping to ensure the upkeep of and maintenance of this important building.

- 5.21 KICC have also appointed cleaning and security contractors which would be made available for outside hiring. Whilst there are no hot cooking facilities on site catering facilities for larger events can be provided by an outside contractor. KICC have agreed terms with a local operator to run the ancillary café who are able to cater for events within the building. Food will, however, be cooked and prepared off-site.
- 5.22 KICC also remain in active discussions with a range of other organisations who wish to use the building when it is not in use by the Church and have been approached by a number of community organisations with a view to using the building or specific rooms for their own purpose including dance classes, social gatherings, networking activities and fitness classes. Such interest may be summarised as follows:-
- Outside business interested in hiring/running the ancillary café.
 - Qualified personal trainer has expressed interest in running a range of fitness classes from the building alongside running conferences regarding the importance of leading a healthy lifestyle.
 - An established local company (the Dancerooms) is interested in using the building for community fitness classes. (Note they have been displaced from existing premises within Crystal Palace due to their existing building becoming a restaurant).
 - Local over 50's group expressed interest in using the building for their monthly meeting as well as hosting a social evening every alternative Saturday.
 - An event company would like to form a partnership with KICC and use the venue to host a variety of events throughout the calendar year. Currently, the partnership is considering the following types of activities:-
 - (i) Arts/Performance (including Open Mic nights).
 - (ii) Corporate Hire (i.e. charity fundraising, awards ceremonies, gala dinners, anniversaries, product launches etc.).
 - (iii) Parties/Functions (wedding receptions, family functions etc.).
 - (iv) Community Initiatives (acting as a supporting venue to other activities taking place within Crystal Palace).
 - Interest from the promotions company, Musiccism, in project managing music and cultural led events within the building. The company have a track record in delivering events including at the Royal Festival Hall, Hammersmith Odeon; Hackney Ocean, the Horniman Museum etc.
 - Local Dance organisation wishes to use the building for a range of dance classes (including ballet, tap, jazz, Acro, Drama and signing). At this stage a minimum of 9 hours per week is required (3 x 3 hour sessions).
 - African Gospel Music Awards nights.

- 5.23 Furthermore, interest from other community groups/individuals has resulted from the recent Public Exhibition. A range of comments were received where interest was expressed in hiring the auditorium or individual rooms and it is hoped to develop these interests over time.
- 5.24 Whilst the extent and nature of these leisure and assembly uses will develop over time what is clear is that even at this early stage there is known and significant local demand for use of the building by community groups and organisations. Co-locating with the church is a much more cost-effective and sustainable way of maximising the use of the application building. Clearly, none of the uses above would be viable in their own right without the wider church use. The extent and nature of these leisure and assembly uses will develop over time as they are dependent upon operator interest and customer take up.
- 5.25 The application proposals seek approval for change of use of No. 25 Church Road from Use Class D2 to a mixed-use comprising both Use Class D1 and Use Class D2. The Church propose to use the building for 30% of the weekly timetable. The remaining time the building will be made available, and actively promoted, for public/community hire. As this section has shown, there remain significant interest from certain community groups and organisations in using the building alongside KICC's principal use as a place of worship. KICC have already invested a considerable amount of money on refurbishing the building, which is to the considerable benefit of the long-term future maintenance and upkeep of the building and Crystal Palace Town Centre. The mixed-use proposals provide the best hope for the building to be regularly used for entertainment and, of regularly being accessed by a diverse range of people in the community.
- 5.26 KICC's wider plans for ensuring community availability of the building are still evolving. However, there is known interest and KICC are actively engaging with various groups with regards to hire of the building. KICC will genuinely make the building available for other uses, not least because they are proud of the building and the investment they have made restoring it and would like to use that to the benefit of the community. KICC will agree to formalise their commitment in a S106 Agreement which will be discussed with the Authority during the application period.

6. Conclusions

6.1 Our conclusions are as follows:-

- The proposed change of use at the former Gala Bingo Building from Use Class D2 to mixed-use comprising both Use Class D1 and Use Class D2 will allow an appropriate and viable use of the building (as a place of worship) whilst also delivering a continued assembly and leisure use at the property.
- In this way, the building’s long-term future and, importantly maintenance, will be assured.
- KICC’s use of the building as a place of worship will:-
 - Provide a place of worship for local people for which there is an acknowledged need.
 - Meet the needs of a group (the BME community) who are recognised to experience disadvantage through the land use planning system.
 - Maintain a community use of the building both as a place of worship and importantly, for other non-religious assembly and leisure uses (e.g. concerts, films, conferences etc.).
 - Support the economy of Crystal Palace throughout the daytime and into the evening period by holding activities and events (both religious and non-religious) which would attract footfall to the locality.
 - Would not be seen to have any impact on parking demand or pedestrian safety in the vicinity of the site.
 - Refurbish and maintain the existing building ensuring its long-term future and benefit to the community.
- The proposal also, however, allows for a continued assembly and leisure use of the building at those times when it is not in use by the Church. Such events will include concerts, live screenings, conferences, seminars, dance classes, etc. Allowing this continued D2 use will both increase public access to the building and add to the vitality and viability of the locality by attracting large numbers of people to the venue. In economic terms the proposal is wholly beneficial to the locality.
- Allow a continued assembly and leisure use of the building consistent with adopted and emerging policy.

6.2 In short, the proposals are wholly in accordance with the provisions of the statutory Development Plan and consistent with paragraph 14 of the NPPF, should be granted consent without delay. The revised proposal overcomes the reasons for refusal of the previous application and there are no known reasons why permission should not be forthcoming.