



Responding to the needs of faith communities: places of worship

Evidence Report accompanying the Final Report

Prepared by CAG Consultants in association with
Land Use Consultants and Diverse Ethics

Responding to the needs of faith communities: places of worship

Evidence Report accompanying the Final Report

Prepared by CAG Consultants in association with Land Use Consultants and Diverse Ethics

July 2008

CAG CONSULTANTS
Gordon House
6 Lissenden Gardens
London NW5 1LX
Tel/fax 020 7482 8882
hq@cagconsult.co.uk
www.cagconsultants.co.uk



Contents

Contents	3
1. Introduction	5
1.1. Purpose of this Evidence Report	5
1.2. Report contents and structure	5
2. Engagement Paper	6
1. Introduction and background	6
1.1. Purpose of the paper	6
1.2. The interview data and process	6
2. The interview results	7
2.1. Purpose of the section	7
2.2. Development needs	7
2.3. Planning system experiences	14
2.4. Growth and decline issues	19
2.5. Possible solutions	21
3. Initial conclusions	22
3.1. Purpose of the section	22
3.2. Development needs	23
3.3. Planning system experiences	24
3.4. Growth issues	25
3.5. Potential solutions	26
3. Planning Research Paper - survey of London Planning Authorities	28
1. Introduction	28
1.1. Purpose and Scope of the Planning Questionnaire	28
1.2. Response Rate	28
2. Broad Findings of the Survey	29
2.1. Policy Coverage (refer to Map Q1 & Q2)	29
2.2. Perceptions about Adequacy of Provision	30
2.3. Assessment of Need for New Provision	31
2.4. Pre-application advice	31
2.5. Consultation Arrangements	32
2.6. Objectors' Concerns	32
2.7. Use of Planning Conditions to address Objectors' Concerns	32
2.8. Use of Planning Conditions to Protect Places of worship	33
2.9. Use of Planning Conditions to Prevent Places of worship in D1 Use Class Permissions	33
3. Data on Planning Applications	33
3.1. Level of Supply and demand	33
4. Analysis of Planning Applications	34
4.1. Approvals	34
4.2. Change of Use	35
4.3. New Development	36
4.4. Redevelopment	36
5. Limitations of the Data	37
5.1. Overview	37
6. Additional Data on Gains and Losses in Floor Space	38
6.1. More Specific Data	38
6.2. Data limitations and further work undertaken	38
7. Planning Appeals	38
7.1. Overview	38
7.2. Analysis of Planning Appeals	39

7.3	Additional Data on Enforcement Notices	41
4.	Case Studies - Experiences of the Planning System	42
1.	Introduction	42
2.	Redevelopment of a Church site within a central location	42
3.	Realising opportunities in designated employment areas	42
4.	Role of Faith Partnerships in assessing needs	43
5.	Developing a 'standards' based approach to provision	43
6.	Taking a positive approach to faith consultation	44
7.	Effective use of planning policy to protect existing places of worship	44
5.	Stakeholder Workshop Briefing Note	46
1.	Introduction	49
1.1.	Purpose of the briefing note	49
1.2.	Background to the research project	49
1.3.	About the work - methods used	49
2.	Findings from engagement with faith communities	50
2.1.	Development needs	50
2.2.	Planning system experiences	51
2.3.	Worship space growth issues	52
2.4.	Potential solutions	52
2.5.	In summary	54
3.	Findings from planning research	54
3.1.	Introducing the planning research	54
3.2.	Developing the questionnaire	54
3.3.	Broad findings of the questionnaire	55
3.4.	Issues and current limitations with the planning data	57
4.	Tentative conclusions to date	57
4.1.	The policy context	57
4.2.	Role of faith communities	58
4.3.	Planning and development issues	58
4.4.	Potential solutions	60
4.5.	In conclusion	61
6.	Stakeholder Workshop Proceedings	62
1.	Introduction	64
1.1.	Background	64
1.2.	Purpose of the stakeholder workshop	64
1.3.	About the Proceedings	65
2.	Proceedings of Plenary Discussion One	65
2.1.	About the first plenary discussion	65
2.2.	Discussion write-up	65
3.	Proceedings of Small Group Discussions	69
3.1.	About the small group discussions	69
3.2.	Needs of faith communities for worship space in London	69
3.3.	Experiences of the planning system	70
3.4.	Possible solutions	75
4.	Proceedings of Plenary Discussion Two	77
4.1.	Feedback from small groups	77
4.2.	Plenary discussion	79
4.3.	Next steps	79
7.	Engagement Interview List	81
8.	Stakeholder Interview and Questionnaire Pro Forma	82
9.	Planning Questionnaire Pro Forma	84
10.	Data from a Planning Authority	89

1. Introduction

1.1. Purpose of this Evidence Report

CAG Consultants with Diverse Ethics and Land Use Consultants have compiled this Evidence Report to accompany the final report of the project *Responding to the needs of faith communities: places of worship*. The Evidence Report assembles detailed data produced from all sources of the project. In that sense it acts as a kind of Appendices to the final report that gives detailed evidence supporting the conclusions and recommendations in the Final Report.

1.2. Report contents and structure

The Evidence Report contains the following data in the order listed:

- Engagement Paper - written to document stakeholder interview findings;
- Planning Research Paper - documenting research with planning authorities in London;
- Case Studies - documenting best practice and lessons for the future from faith communities' experience in and outside London;
- Stakeholder Workshop Briefing Note - sent out to stakeholders prior to the workshop held as part of the project;
- Stakeholder Workshop Proceedings - documenting the detailed discussions at the stakeholder workshop
- Stakeholder Engagement Interview List - detailing faith organisations contacted;
- Stakeholder Interview Pro Forma and questionnaire - developed as a basis for in-depth discussions with faith community stakeholders;
- Planning Questionnaire Pro Forma - developed as a basis for surveying London's planning authorities in regard to faith communities' planning applications.

2. Engagement Paper

The following paper provides detailed summary of the engagement work done as part of the project up until February 2008.

1. Introduction and background

1.1. Purpose of the paper

The engagement reporting in this Paper (Paper 1a) has two purposes:

- To document views and reach initial conclusions which provide a basis for part of our project analysis, and
- To report on primary data for use in interim and final reporting.

The engagement aspects are being undertaken within the context of the wider research project into the worship needs of faith communities. We are aware from recent Sustainability Appraisals that issues have been raised about inadequate provision in the planning system for places of worship, particularly by Pentecostal churches, which require large-scale venues. This topic is complex and raises equal opportunities and diversity issues, because of the close relationship of faith, ethnicity and race in many of London's communities. Thus a key aspect of the interview programme is to explore the experience of wide range of faith groups in relation to the planning system.

1.2. The interview data and process

The data for this paper comes from a series of faith community structured interviews. The engagement interviews have an important role within the wider research project that also covers detailed quantitative and qualitative research in relation to the planning system and focuses on London Planning Authorities. We have endeavoured to achieve wide coverage across faith groups, within limited project resources and a relatively short timeframe.

At the time of writing a number of interviews are still to be carried out due, in some cases, to difficulties in securing interview contacts, and in others in finding times that suit the faith community concerned. In a few cases communities have not responded to repeated contact attempts for unknown reasons and where possible interviews with alternative groups from the same faith community have been pursued instead. Interview results that were not able to be included here will be included in interim and final reporting. The faith communities approached and the outcomes of those approaches are listed in the Appendices (Appendix 1). There are also questionnaire responses to the project website, and again data from these will be incorporated in to latter stages of reporting.

Each faith community interview has been undertaken according to a detailed Pro Forma developed for the programme and agreed by the client. The report is structured around the Pro Forma structure. A copy of the Pro Forma is found in the Appendices (Appendix 2).

2. The interview results

2.1. Purpose of the section

2.1.1. Section 2 comprises themes emerging from the interviews with representatives of faith communities. These are presented in the following areas:

- Development needs - spatial needs over the next 15 years, times of greatest use, responses to peaks in demand, and wider use of worship space facilities. Key issues covered include transport and access, and sustainability;
- Planning system experiences - experiences of faith communities with the system, groups' level of expertise, support given, the role of boroughs, and issues around sharing resources and extending facilities;
- Growth and decline issues - whether communities are growing or declining and implications for worship needs in future; and
- Possible solutions - suggested ways for meeting future worship space needs, both spatially based and in terms of improved processes.

2.2. Development needs

Spatial needs for worship space

2.2.1. Interviewees were first asked what they think are the spatial needs of their faith community in terms of places of worship over the next fifteen years. It was suggested that this could include aspects such as large congregation space; community facilities; facilities for disabled people; outdoor space; public transport provision to allow worshippers from further afield; and dedicated car parking.

2.2.2. The situations of different communities in terms of current provision vary widely, from those who have churches dotted across London at a fine-grained level to small faith communities who worship in people's homes and hire venues such as small halls if needed for particular holy days or as speaker venues. Interfaith groups pointed out a growing need for interfaith spaces, as well as for spaces particularly focused on single worship communities.

2.2.3. The spatial issues in terms of size of expected needs also vary, but a number of communities reported a serious issue of growing out of their current venue(s) and facing barriers to that growth because of the expense and lack of availability of suitable land/buildings to expand into in London. Some groups believe they may be close to needing more space in various parts of London:

There has been discussion within the Community about the possibility of developing a central venue. But so far, the decision has been to develop activity at borough level, so a central venue would not be particularly appropriate. So far hiring halls has been enough for groups of 100 or so. If numbers got to 1000 in a particular area, the Community might need to consider buying a building.

2.2.4. More established faith communities are finding that sometimes the long-term location of their worship space no longer presents the best spatial fit. This is particularly the case when area based regeneration is underway, such as housing estate renewal into more mixed-use communities. Faith communities are keen to make sure their worship spaces stay spatially at the heart of revived and new communities. Thus, as one interviewee reported:

We are in a difficult position as we have an existing historically based church estate - we would like to redevelop at the heart of communities. The challenge is to match up where people are and where churches are when redevelopment happens i.e. more from the edges to the heart of estates.

2.2.5. The sharpest issues in terms of projected need come from Evangelical and Pentecostal faith communities who are currently experiencing very significant pressure on existing facilities and constraints on future growth. The issues are perhaps most difficult for them as they tend to have very large and growing congregations and generally do not possess large building and land stocks or other sources of income in the way more established churches do. An interviewee noted that this is not really a new problem but one that is growing:

In London I think there is a phenomenon of rapid increase over the last 20 years of black majority churches. Back in 1985 "Faith in the City" talked about these growing congregations and talked about shared spaces where single use wasn't cost effective. Now there is real expansion of Evangelicals. They have really significant needs. They are converting premises. We need a concerted effort to work with these black majority churches to help them get appropriate premises.

2.2.6. Muslim faith communities have also been experiencing sharply increasing needs in terms of rapidly expanding congregations and this has for some years been presenting them with the need to expand in particular areas and in relation to both worship space and associated cultural, educational, training, community development and economic development arenas:

The organisation grew rapidly in the 1980s. [This area] has an increasing population of Muslims and migrant communities. So needs have expanded too. The (new) Mosque was built in the 1980s as people were coming from all over London. We began to plan to develop [our cultural] Centre.

2.2.7. Equity of access both to existing facilities and to new sites is an issue that troubles most groups to some extent. The overall lack of suitable spaces is seen as leading to the following situation, in this case in a regeneration context but applicable more broadly:

There is a sense that all faiths get too little space and then are left to fight it out between themselves.

2.2.8. Recent difficulties with the planning system (see more in sub-section 2.3.1.) are felt to have exacerbated the situation of faith groups suffering from space shortages. The system is thought to have also shown a lack of cultural awareness and sympathy with their plight. As one interviewee argued:

There appears to be an ideological opposition to faith groups taking over certain premises. Through the GLA/LDA there needs to be faith literacy for planning officers. There is not enough of that taking place. Officials need understanding of cultural issues.

Peaks of use of worship space

2.2.9. Interviewees were then asked what the times are when the use of worship space is greatest. Is it mainly on certain days? This could include Sundays or Festival Days. The next question was about how communities cope with increases in demand. As a follow up, interviewees were asked if this means the need for special arrangements in terms of security, car parking or crowd management.

2.2.10. For most of those interviewed, worship space needs are cyclical and they have peaks of demand on a weekly basis related to worship cycles, as well as bigger peaks of use on special holy days, feast days, during festival periods and celebrations. Typical responses are as follows:

Yes, there are about 30 days in the year when we have special festivals and celebrations for the community when there is peak use.

There are a number of holy days throughout the year when London-wide events tend to be held.

So on special days - i.e. Fridays and the month of Ramadan, night prayers and Eid prayers - at those times we need more space.

2.2.11. Some noted that peaks in use can cause impacts locally which may need to be dealt with better than at present. These tend to be more an issue with larger congregations such as those attending Charismatic church services and can include noise and car parking:

The Charismatic churches may have services that go on for a long time and there can be issues around car parking and noise. People tend to travel to these churches quite a long way.

2.2.12. One faith community suggested that there has been a significant change in patterns of worship space, so that through-the-week use has increased markedly. Multi-faith groups similarly tend to have use patterns that are more constant and less cyclical within their worship spaces.

Dealing with peaks in use

2.2.13. Methods by which faith communities cope with increases in demand vary. Some communities have a reasonably large capacity for worship space expansion at their existing facilities, through having inherited or built churches, temples, mosques, halls or other spaces that are larger than needed for usual weekly use, or by having underused land adjoining their buildings for overspill:

We have built two large halls, which can be worship space where carpets are laid down. We have kept the environment minimal to allow that flexibility.

2.2.14. Some interviewees note they need to be creative about the use of space to deal with demand peaks, including methods to actually limit demand, which they would prefer not to have to do:

But there is a problem on special days when nearly 300 people come. We limit the number of people who are invited, by limiting the circulation of notices and invitations. More people would want to come if there was more space.

2.2.15. A number see increases in demand as meaning they need to extend their existing premises and acquire new space. The peak demand issue is also tied to overall increases in demand that need to be dealt with. This is an issue

for both large and small faith communities. One small group said that it is bursting at the seams:

This is a problem for the Soho temple, particularly for Krishna's birthday. The temple is bursting at the seams – people can't all fit in. They can queue up for Durshan (kneeling to the deities) and then leave, but can't stay for worship because there is not enough room.

2.2.16. However it would appear that the sheer scale of the issue makes it more serious concern for Pentecostal/Charismatic churches who are dealing with increases in demand in two main ways. The first is by trying to find cost effective, large premises centrally in London. It is acknowledged that this is very difficult given both the expense and scarcity of space. The second way is by expanding in particular places in London where their congregations are particularly large. This in turn reinforces the need to develop proper partnerships with local authorities to ensure such spaces can be found and permitted (of which more in Section 2):

We are seeing a real expansion of independent African Charismatic Churches, which are growing in places including Walthamstow and Brixton. Therefore there will be a greater need for partnership, which will be increasingly important.

2.2.17. Those in outer London (or with space just outside the Greater London area but with most worshippers attending from within London) tend to have more opportunity to secure and arrange extra space to deal with peaks of demand in religiously appropriate ways, for example, for worship space and for extra parking space:

We have an 80-acre site in Potters Bar, so we can allow parking on the grass. We put special marquees to cope with the thousands of attendees. Members are very polite and courteous. No alcohol or non-vegetarian food is allowed on the premises, even when we hire the property to others. These strict rules are enforced fully.

2.2.18. Car parking however remains particularly problematic for a number of faith communities on special holy days when larger than usual numbers of worshippers visit their facilities (of which more below).

2.2.19. A multi-faith group argues that sharing worship space is the obvious way forward, citing their own experience in central London as an example of what is possible through this sharing. It should be noted that the example refers to sharing with a number of small groups rather than those of larger congregations for whom space constraints would still be a problem:

Physical bare land is too expensive and unavailable. City churches do share with other faiths. There is increasing diversity and small groups do not have resources of their own e.g. Sudanese, Moldovan, Bahai – we share our space with them.

Transport, access and parking issues

2.2.20. Transport and access issues are important to almost all of those interviewed. A number of faith communities point out that they chose their current worship space site because it has good or excellent public transport links. There are still though access issues for older and disabled worshippers who often find public modes difficult or impossible to use. Tube and bus access are the most commonly cited while a number encourage car sharing, and some

run shuttle buses from tube stops. The relationship between these 'mode shifting' actions and reducing impacts on neighbours are well understood:

We have been very sensitive to needs of local residents and encouraged car sharing among our members.

2.2.21. Given that a number of worship spaces attract worshippers from some distance away (often some miles or from across London) attracting more worshippers to use public transport where possible is particularly important for assisting in creating sustainable access arrangements. Outer London located worship spaces have more transport issues because they tend not to be as well served by public transport. One group which has a space just outside London (but many London based worshippers) noted that:

This is a major problem. It is not on a bus route and far from the nearest station which is Potters Bar on British Rail. There is no footpath access and there are no lights on the road. So at present, visitors have to come by car.

Another said:

We need more car parking – there is no car park at present. It is difficult to park at present but we have some car park permits.

2.2.22. Particular aspects of constraints on space, such as how to deal with car parking, are perceived as an important issue by a number of faith groups. However, views vary significantly about the nature of the problem and likely solutions. While some groups are happy with their level of car parking provision and most appear prepared to encourage public transport for most worshippers (if such transport exists close by) they see a need for car access by disabled worshippers as a reasonable requirement. Some larger faith groups also suggest that a lack of large-scale, general car parking space on-site or close by is a problem for their faith community. This is especially perceived as an issue for Pentecostal/Charismatic churches with very large congregations and large spatial catchments. Another group meanwhile similarly argued:

We have a £5mn marble temple and community halls, which can cater for 2000 people and parking for 400 cars. We need a space of about 15 acres in North West London where the majority of the community lives. We also need parking space at our site in Croydon, South London, which is having serious parking problems.

2.2.23. Others also with very large congregations conversely take the view that car parking space is a luxury when space is so tight and this space might be better used for expanding buildings and thus worship facilities themselves:

So we have plans for development just to the east where the car park is now. It is nice to have the luxury of a car park but we are considering developing over that.

2.2.24. Others, again, argued there are sustainability problems implied by unconstrained car parking provision and therefore this is not something they wish to support. Instead they pointed to excellent public transport at their current locations or suggest that new worship space should be sited close to public transport lines and nodes so less travel by car is required:

This partly depends on the planning system providing opportunities. In terms of cycling/transport use, there is hardly anyone who drives. Instead trips to worship are done by public transport. On transport, we are seeking in new development to locate on transport lines/at nodes.

2.2.25. Awareness about broader sustainability issues connected to worship space needs varied among those interviewed. The larger, more established groups tended to be more likely to formalise their Sustainable Development policies. The Anglican Diocese, for example, has a strategic plan with an objective to shrink their environmental footprint by over 20%. They have also changed their internal regulations to improve their sustainability performance in terms of changes to building stock.

Provision by faith communities of wider community services

2.2.26. Interviewees were asked if their place of worship was used to provide services to the wider community, or could be in future. This could include meeting space, or school and educational visits.

2.2.27. Virtually all of those interviewed so far said their worship and associated spaces are providing services to the wider community. All are open to visitors from outside their particular faith communities and host visits 'all the time' from schools and others including representatives of other faiths, businesses, public servants and professional people, which have educative and cultural understanding purposes. All see faith and cultural needs as strongly interconnected:

For us faith and culture are entwined, so needs are dual.

2.2.28. Both the larger, more established communities and the smaller faith groups have a very strongly developed community service remit as part of their faith; differences tended to be in relation to the scale of their activities. Most demonstrated a very well developed and diverse range of services being offered locally, and across London in some cases. As one interviewee put it:

The strategy is to serve the people of London. We wish to demonstrate our faith through service to the people of London. To do that requires different responses in different places i.e. social enterprises in local areas, partnerships across denominations, across faiths (such as in Tower Hamlets).

2.2.29. Services are being delivered both at worship spaces and in an outreach way. One inner urban located community has in the last 10 years built a cultural centre next to its worship space and together these spaces serve as the hub for a very wide range of needs:

We want to make the Mosque a hub - education, counselling, community, cultural, etc. So the work falls into 5 categories: spiritual, religious; social; economic development; training/education; and community cohesion.

2.2.30. These kinds of services appear fairly representative of the activities faith communities are involved in association with their worship spaces. Another established, larger faith community also pointed to its work in urban renewal in deprived areas, and gave the following example:

In a deprived area we have rebuilt a church with a community cafe, doctors' surgery, Sure Start, community learning centre.

2.2.31. As noted at the end of the previous sub-section (2.2.4), both larger and smaller faith communities support others by sharing their space, often by hiring or simply giving their space for use by others for good causes such as community group meetings. Smaller groups often provide similar services to those of the larger groups but at a smaller scale. Thus, one smaller faith group said that:

We have auditoriums, meditation rooms, dining rooms, children's room, meeting rooms and office and other diverse spaces within the complex.

Centre-based and home-based worship

2.2.32. Interviewees were asked whether needs are purely faith or worship based or also had a social and community orientation. For example, one subsidiary question was whether there was a tradition of home shrines and home-based worship that might help meet needs.

2.2.33. Clearly, from the material presented in the last sub-section (2.2.5), faith communities tend to have a strong social and community orientation as well as a worship one. One larger faith community's worship and cultural space, for example, hosts the following social uses:

The times when we are not using it for worship the building has a wide range of uses: gym; children's centre; multi purpose hall for weddings, conferences etc; meeting rooms; school; classrooms/offices for multiple use such as adult education service including ESOL; Library/seminar rooms/ICT/media suite and radio station.

2.2.34. In this case the faith community cross subsidises its social, cultural, and educational activities by renting out space to suitable businesses whose rents help pay for social activities and help develop community capacity:

Business uses within the ground floor space makes up 17% of the centre space. This helps cross subsidise other uses and recurrent costs and there is a range of businesses. On the ground floor there is a restaurant and two services. People get skills there, such as supporting women in business. This has helped increase capacity.

2.2.35. Another large, established faith community also builds and redevelops spaces to be multi-use but cautioned about the need to do so carefully and build in sufficient lead-in time:

Actual physical spaces can be reused although that doesn't always work. There could be design problems or lack of social capital. We need to look at a 5-7 year lead-in to establish what's needed and develop it.

2.2.36. For Pentecostal/Evangelical churches, in particular, the large scale of congregations is felt to respond to large-scale social programmes, which in turn emphasises the need for large-scale spaces. For these faith communities this reinforces the problem of lack of adequate space, which is stopping communities from offering the level of social service they would wish to:

The thing is all of these large churches have large, expansive social programmes so they want larger spaces to expand their welfare activities. This fits in with government priorities. At least 85% of services are about social welfare.

2.2.37. Diversifying into home-based worship is among the strategies to deal with growth pressures being pursued by Pentecostal/Charismatic churches:

So they tend to diversify weekly activities in people's homes (by having a number of small services for example).

2.2.38. It was pointed out that for some faith communities it is a religious requirement to pray at their worship space as well as at home. So, while home-

based worship is encouraged it cannot replace the need to build worship spaces that people can attend to pray:

With the Muslim community, men must participate in Mosque based prayer. Women don't have to, but prayer can be offered anywhere. So people will be praying at home but men also need to come to the Mosque. The Mosque is a pivotal point in the life of Muslims. People will organise their day around prayers.

2.2.39. Often the amount of visiting to the community's worship space varies between individuals as a matter of personal choice and circumstances. Some will worship at the worship space daily while others do not do so. For Muslim women, for example, although they are not required to pray at their Mosque but can equally do so at home, many wish to attend the Mosque to pray and will worship there especially on special holy days and times like Ramadan:

We have provision for 500 women but during Ramadan the first floor hall is dedicated to them and can accommodate 1500 people. It's the same on Eid days. So we recognise the need and desire of women to come to the Mosque.

For Hindus too there are:

No hard and fast rules about when people should go to temple or worship – festival days. Some people are very devout and go every day; some once a week; others less often. It is a matter of both practicality and inclination.

2.2.40. For some faith communities, such as Hindus, there also appears to be a significant focus on home-based worship. Some communities have a tradition of home-based shrines and worship so there is no compulsion to visit temples daily. Others refer to their encouragement of worshippers creating meditation rooms at home. Meanwhile a multi-faith group suggested that there is a new 'house church' movement, which is growing rapidly but has not been a tradition in the past. One group pointed out that:

This reduces the need for daily visits or even weekly visits. It complements the community centre well.

Implications from these development need themes are dealt with further in Section 3.

2.3. Planning system experiences

2.3.1. A major purpose of the research is to explore how the planning system responds to faith communities' worship space needs. It has been important therefore to delve into the experience of faith communities in dealing with the planning system. This section covers our findings from the interviews in this area.

Experience of planning applications

2.3.2. Interviewees were asked what their experience of planning applications has been. This could include successful applications, or barriers encountered in relation to any recent planning applications made for new or expanded places of worship.

2.3.3. Views vary between those we interviewed. A few communities have enjoyed relatively positive, straightforward relationships with planning authorities and the planning system. They reported no problems getting

permissions and a good relationship with their local councils. Some we interviewed however have experienced issues with the planning system and there are also a number of significant examples of very negative experiences. Long-established, major faith communities experience appears to be predominantly positive, with an understanding that faith communities are 'at the heart of communities', although there is a sense that this can vary depending on elected members' views:

In some cases the planning system experience is good. In others, elected members can show a lack of understanding about why we want to be there. "If we let you have space, we have to let everyone else have space".

2.3.4 This perspective was supported by another interviewee, who also felt that the views of councillors mattered greatly when it came time to decide on their planning application. In this case it was felt that the Council Leader being Asian was important to cultural understanding about their application, and again there was also a subtext of opposition:

We were fortunate that when we made the application, the Borough Council was led by an Asian who was sympathetic and supportive. On the day of the decision, some of the main opposition were absent, so it was carried.

2.3.5. Other large, established faith communities described their experience with the system as difficult. In one case two potential sites for a major temple had to be abandoned because planning approval could not be gained. In another, the faith community wished to develop a site to extend their worship and cultural space that the local authority had identified as suitable for luxury housing. This community said they had to get into "a bit of a wrangle" with the Local Authority in order to convince them, as the Borough had a substantial deal with developers. It was only after community pressure that things started to change and there were still issues with the planning application process:

The first set of drawings was frowned upon. Our planning and architectural team had to work hard to appease the planners. Discussion took over a year. Once that was got through there were a few fleeting issues i.e. façade treatment. We did it as a 'design and build'. The council placed a number of restrictions i.e. businesses cannot have any parking facilities. We think there could have been relaxation. During that year, three of our projects got Beacon status. The local authority started to see the point of [our development].

2.3.6. More recently arising large faith communities with large-scale spatial needs have particularly found the system hard going. The most serious individual example reported to us during interviews so far is about Kingsway International Christian Centre who have approximately 8-10,000 people in their congregation. Our interviewee explained that Kingsway was bought out by the London Development Authority for the Olympics site. They gave up a big site on the basis that they'd be looked at favourably if they relocated to LB Havering. However:

Last week they were turned down by Havering. London Thames Gateway [Partnership] must have been talking to the GLA. The signal this sends out to other churches where they are going to relocate is bad. Obviously they'll appeal. They have had over 6,000 petitions from people.

2.3.7. A smaller community, which has a worship space within London's greenbelt, understandably reported issues in their use of the space. Because this is a protected area, their use of the site causes problems for the group, as their neighbours find noise impacts unpleasant:

This is a greenbelt, protected area, so there are many restrictions on development. Also, there are residential homes right next door, and this is causing problems from neighbours who are imposing sound restrictions.

2.3.8. Other small groups reported issues around the heritage listing of some of their buildings, which tends to make renewal complicated and expensive. In one case a group reported it was unable to afford to undertake a building reuse project to turn it into a worship space because of requirements by English Heritage in relation to materials that had to be used in the refurbishment process. Another suggested that operating in historic churches made for dual problems of listed building rules and the general planning laws. Another group said somewhat more positively that:

[Planning applications] do take time and are cumbersome, but Council is generally helpful. Brent is very multi-cultural and sympathetic to our needs.

2.3.9. A relevant point about scale is that communities with smaller worship spaces tended to feel that these caused less objections from neighbours than did planning applications for larger spaces. One interviewee said that smaller temples caused less of a problem with neighbours, thus the issue appeared to be not so much about the faith background of the worshippers but the size of the development and therefore the scale of possible impacts like noise. In this case they explained that

Smaller temples have less of a problem. Residents will still write to the council to object. But they are somehow convinced by the council.

Planning expertise and support

2.3.10. Interviewees were asked about their expertise in the planning area. They were asked if there was any support given during the planning process. Again, interviewees provided a mix of views about planning expertise and support offered during the planning process. Some pointed to good levels of pre-application support and advice by planning staff while others felt improvements could be made. Typical views included:

The informal meetings with Council planners were most helpful.

The local authority also provided some staff to offer pre application advice.

Yes, good support was given by planners, especially from informal consultation. There was no need for separate advisors.

The council has been very positive and supportive generally – this is one of their flagship faith sites.

2.3.11. However, only one large, established faith community felt it had sufficient skills in-house to deal with planning issues without support and another felt it had 'some expertise'. One of these groups felt that councils tended to support site development where there was 'something in it for the Borough' such as generating high value land for residential development. A number felt they had been on a learning curve in terms of their own understanding and skills in relation to planning, architecture and design. Some larger groups with the resources to do so bought in planning and architectural expertise. They pointed out that smaller faith groups they knew could not afford to do that and had 'hit a brick wall' with the local council when trying to extend their facilities. Comments included that:

No we do not have expertise. Dealing with changing legislation is very hard and costly.

Skills of seeking permission are complex and require resources. Appeals take a lot of energy and as our main support base is voluntary, this takes up a lot of effort and resources.

2.3.12. One interviewee noted that the planning requirements on them in terms of height restrictions seemed to be stricter than those for their neighbours and wondered why that was the case:

For our proposed development, we were told to keep to the current building height but there are nine story flats close by in X Street. There is new flat development opposite the Mosque tower. We had to give half the land for social housing (RSL run). There is a particular focus on housing elderly, single people.

2.3.13. Another faith community explained that their experience of the planning system had raised a number of constraints to be overcome due to heritage building listing:

The process was difficult because of listed building restrictions. Council planners came to visit the site many times, got a grasp of the problems and helped to shape the solution. Originally the planners didn't want us to change the building, because it is listed. But we were able to use a small space behind the building. When we wanted to repair parts of the building (e.g. arch), we talked to planners who explained that permission was needed. They came to visit and gave the OK for repairs.

2.3.14. Some interviewees suggested ways the planning application process could be improved by becoming more user-friendly in terms of language used:

I think one thing is that local authorities need to ensure the planning regime is a bit more user friendly. The last thing you want is a professional elite and double Dutch for everyone else. So it needs to be made clear for ordinary folks. People need to be more aware, so they can be more willing to work with London Planning Authorities.

2.3.15. Issues about cultural sensitivity were raised by a number of interviewees in this area and there was a feeling from one interviewee that they had less support in planning terms now that their Borough was no longer led by an Asian Council leader. They argued that:

As we are a minority group, we have no loud voice or power.

2.3.16. Another interviewee suggested ways this might be improved by having a faith planning advisory group at each Borough level with 10-12 independent members. This would show that councils take faith issues seriously.

The overall planning process

2.3.17. Interviewees were asked how the borough supported site development and use after opening of their place of worship. As a follow up in this area, they were asked what was their perception of the planning process.

2.3.18. Interviewees reported a mixture of experiences in relation to the planning process and their interaction with Boroughs once their worship space was up and running. Some felt that local authority staff had been supportive both through and after the process while others saw substantial weaknesses. Some explained that their borough had not been particularly supportive at the start of the planning process but had later 'bought in', including helping identify and secure external regeneration funds such as SRB, ERDF, New Deal and funds

from other charity sources. Others pointed to constraints relating to heritage listing meaning no external development was allowed on their building.

2.3.19. Some of the interactions with the planning system overall were about positive assistance to ensure there were no or minimal external impacts from the worship space. In one instance help was provided in relation to ensuring there were no increases in road traffic and to monitor road usage and parking. In another example the local authority has:

Generally,...been very supportive and considerate. For example, they allowed us to build 5 acres of landscaped gardens around the temple. In general, the planning process is empathetic.

2.3.20. After worship spaces were operating, views about Boroughs' performance were again somewhat mixed. One of the issues was a perceived lack of follow up:

That's a tricky one. Let's think about what doesn't happen. You get the building up and running. They [planning authority representatives] may come to the opening but that's the end of it. There should be post-opening follow-up. Wouldn't it be nice if Local Authorities came back to see how it's working. In the first instance officers. It would send all the right signals.

Sharing resources across boroughs

2.3.21. Interviewees were asked if they thought there may be sensitivity about sharing of resources especially when worshippers may be living in different boroughs but using place of worship services of one borough.

2.3.22. Most said that this was not an issue for their faith community and there was a substantial degree of unanimity in this view. One interviewee did suggest that there might be sustainability implications for some groups as they travelled some distance to worship spaces. Others were very strongly supportive of the idea that in principle worship spaces should be open to people from all parts of London and had a broad catchment themselves. A relevant comment was:

That [inclusivity] is basic to Islam. That's our attitude; whatever people's social status, or ethnicity.

Expansion issues and the planning system

2.3.23. Finally in this area interviewees were asked if they have any plans to extend their place of worship facilities, or expand into new locations in London. A considerable number of those interviewed, both large and small faith communities, said that they do have expansion plans, or at least expansion aspirations. Expansion issues are particularly critical for Pentecostal and Charismatic churches, many of whom we heard have outgrown their current premises. Some are looking to locate in other parts of London than the areas where they are currently located, such as moving from South to North London. The example of Kingsway International provides evidence of the kinds of barriers that can be faced in trying to do so. Meanwhile a Muslim organisation said:

Yes, because we've toyed with the idea of extending our facilities for a year. As it's so large we will have issues raising resources and getting up

and running. We will take a couple of years. Again the organisation will grow. When we opened this we realised the magnitude of the responsibility - both physical space and logistics.

2.3.24. Smaller communities noted plans to either extend facilities at current locations such as to build new worship spaces and related areas for prayer, meditation and education and dining. A number also noted the fact that they may not be able to afford to redevelop or expand their worship space because of high rents, land and building costs, particularly in central London. The multi-faith interviewee suggested that the multi-faith spatial model may well be replicated across London and beyond. Expansion is further discussed in the next section.

2.4. Growth and decline issues

Growth issues

2.4.1. Interviewees were asked if they think their congregation is growing or declining. They were asked what they think are the implications for their place of worship needs.

2.4.2. Interviewees generally perceived their faith community to be growing, but the speed, scale and spatial location of growth varies widely. As noted above, most communities are contemplating or planning to expand their worship space, if and when they can. For Pentecostal/Charismatic, Muslim and Hindu faith communities, the growth trajectory tends to be rapid and large scale, bringing with it some difficult issues. For some other large faith groups such as the Anglican community, and for smaller communities of various faiths, growth is substantially slower but thought to be steady. Almost all communities reported some pressures on worship space brought about by growth.

2.4.3. There was a perception that there need to be better ways of supporting Pentecostal/Charismatic churches capacity to provide sufficient places of worship. For example, this could occur through partnership working arrangements at strategic, local authority level, and when large new community facilities are being planned and built, so that their requirements for large-scale worship space can be taken into account:

For Pentecostal/Evangelical groups we maybe need to pay more attention to their needs when building large facilities i.e. when conference, sport, and cultural facilities are being planned. It is hard for them when they are still having to rent space. We share space as far as possible. We understand the pressures of the planning system.

2.4.4. Some other faith communities are also growing fast, such as the Muslim faith community, and one interviewee explained that this has brought a number of issues in its wake. One set of issues is around the complexities of the community working their way through the planning system to develop new worship buildings and spaces (as described in 2.3), while another issue is related to their widening social and economic responsibilities as a faith community 'hub' in an urban regeneration context:

We are growing fast! Growth has bought about a number of social issues over which we have limited control i.e. drug issues, crime/young people, so we support youth initiatives. It has become more important for us to provide support to people with multiple issues.

2.4.5. Established faith communities like the Anglican church also have a central role in new urban development and regeneration, citing landmark publications from the 1980s such as *Faith in the City* and programmes such as the Church Urban Fund as an important background to their long term work in area renewal across London. As they explain they also have a strong interest in new urban areas:

Having the right capacity when new communities are planned [is important]. We want to be there as part of planning. We have master planning capacity.

2.4.6. One interviewee cited growth barriers in seeking to reuse redundant worship space, which are related to issues explored in 2.3. Although the faith community in this example had managed to find a redundant space and prepare plans to reuse it, their lack of financial resources to deal with the requirements of heritage protection became an insuperable barrier.

I was project director for [an Evangelical] Church. It was a redundant Church of England church. We got the best out of the process but couldn't afford to go through with the process as we couldn't afford to do the renovations according to English Heritage requirements. York stone is very expensive.

Exceeding current provision

2.4.7. Interviewees were asked if their congregation is large and fast growing. In that case, they were asked whether they already, or are they likely to, exceed current provision for places of worship.

2.4.8. Answers to this question are tied very closely to those in the previous sub-section. While some interviewees from smaller faith communities felt that they would be able to keep doing things like hiring halls, this was not the optimal solution for them. For interviewees representing some larger faith communities there was a more serious level of unmet growth needs for places of worship. While some had plans to develop new places or worship or expand existing space, many were not confident they could go through with these, given barriers of expense and lack of land/building availability on the one hand and examples of perceived lack of cultural understanding by local authorities on the other. The problem of insufficient space and inadequate options for addressing that problem appeared to be substantially worst for Pentecostal/Charismatic churches than for many others, but also a significant issue for Muslim faith communities. As one interviewee explained, in relation to reaching worship space capacity at their present site:

Once we reach our maximum we'll have to call it quits. Then forge additional partnerships with other Mosques, in [local authority area] and elsewhere. There's about seven big Mosques around London. We already work with them.

2.5. Possible solutions

Using redundant spaces

2.5.1. Interviewees were asked if they had suggestions for meeting future needs. This could include reuse of redundant churches; shared use of buildings; new multi-faith centres; or other options.

2.5.2. As noted in the previous section and earlier in the paper, using redundant worship (and other) space is a strategy that a number of faith communities have employed with varying levels of success. Some of the barriers to this such as high costs have been noted above, but interviewees suggested it remains a very important option for the future. A number commented along the lines that:

We would have no problems using a converted church.

2.5.3. One interviewee tied together the possibilities for reuse of space with the post-Olympics legacy in East London:

London isn't short of leftover, disused, derelict spaces; therefore there is much scope for faith centres to spring up. So eyesores for London could become faith places. I love the idea of a multi faith centre as part of the Olympics development. That would be a legacy post Olympics.

Shared use of space

2.5.4. The practice of shared space appears to be relevant to both smaller and more newly emergent faith groups and to long established ones. The longer established larger groups tend to host smaller groups at their worship spaces but suggest that many want to move on to having their own spaces. Shared use of space is central to multi-faith groups who suggest their model of space may well be the way of the future. For some interviewees the idea of sharing space seems a positive way forward:

We are happy to share buildings with other faiths or secular uses. In fact [our] Community already sometimes hires the centre in Kilburn and the centre run by St. Ethelberga's.

Partnership working

2.5.5. Some of the solutions proposed by interviewees were about processes to help improve spatial planning for worship space in future. One of the suggestions was around partnership working at local and strategic level (see also the local faith advisory group idea mooted at 2.3.2):

If local authorities are really talking about local services, there has to be that real partnership so people don't feel like its 'us and them'. Groups often spend £1000s for people to do their planning applications but they need to establish partnership between faith groups and Local Authorities.

2.5.6. There was a need expressed for there to be closer engagement at GLA level on the intersection between faith communities and the planning system. This would help redress a perception that what faith communities hear about GLA policy on faith and what actually happens on the ground do not necessarily fit together as well as could be hoped. This would be pursued in partnership with other faith stakeholders including those in the private sector involved in urban development:

I would like to engage with the GLA and colleagues in the private sector. There are articles about churches being the centre of new development. That doesn't fit with what we hear from the GLA. We respond to all Local Development Framework processes (5 in the last year). I would like to be engaged in these discussions. We are pretty well versed.

Training

2.5.7. A number of other process-related solutions were suggested to deal with a fairly widely perceived lack of (or limited) understanding of cultural diversity. Some interviewees pointed out that faith communities can and do make a major contribution to social inclusion and urban regeneration and this has been recognised at a national policy level. Therefore, they argued that it is now time to institute practical steps in London to better recognise that contribution and be more sensitive to the cultural diversity of faith communities. One interviewee made suggestions for training improvements for national and local government staff within a partnership-working context:

Hazel Blears thinks faith plays a very positive force in/contribution to public affairs but faith communities can't make a possible contribution if they are strapped for space. That will help public policy. We need to understand the way they work. They should put on courses for central and local government officials. It needs to be a partnership.

2.5.8. It was also suggested that education is needed among planners to help them clarify the complexities of the planning system, to make it more user friendly to faith communities. This relates to earlier comments (at sub-section 2.3.2.) about the way the technical language used in the planning system alienates people:

DCLG tried last year, there has got to be a real educative process on Local Development Frameworks so the planning system can be much more user friendly. It just needs officials to talk to people before they put the final plans in.

2.5.9. In the next section some initial conclusions from all these ideas and views are teased out.

3. Initial conclusions

3.1. Purpose of the section

3.1.1. Section 3 is a brief analytical section drawing on the thematic findings to suggest initial conclusions. These will be revisited once all the interviews are completed. The section focuses on:

- Initial conclusions from the engagement findings; and
- Makes cross-references where possible with the project's research on the planning side.

3.2. Development needs

3.2.1. An initial conclusion is that current provision of worship space varies but almost all communities interviewed are growing and have unmet worship space expansion needs and aspirations. There are particular difficulties for larger, newer communities especially Pentecostal churches, with high needs due to large, growing congregations but less resources than some established communities. Both longer term and newer faith communities are finding their current facilities no longer provide the best spatial fit for their worship needs but the expense and scarcity of new sites - land and buildings - is a substantial barrier to expansion. Although no interviewees suggested government should

subsidise them financially they do feel that more support could be offered in other ways.

3.2.2. For example, there is a certain amount of anxiety about equity of access to new sites which could be better handled. Moreover there is a strong sense that there is a lack of faith literacy and cultural awareness by some councillors, planning and policy officials at local, regional and national level that could amount to 'ideological opposition' to faith communities that should be addressed. Recent difficulties with the planning system are felt to have exacerbated the situation for faith communities suffering from worship space shortages. Examples such as Kingsway International where a Pentecostal church failed to obtain planning permission on a new site, having been persuaded to move there, reinforce a sense that faith communities are not getting a fair go.

2.2.3. For most communities (apart from multi-faith spaces) peaks in use of worship space are cyclical, covering daily and weekly worship as well as special holy days and holy periods and festivals. Issues are particularly sharp during times of peak demand and can cause local impacts like noise and car parking. Some communities can deal with peaks in use fairly well because they have reasonable amounts of space, and creativity about using space to its maximum seems to be a shared conclusion.

3.2.4. Other communities find this more difficult because they are outgrowing or have outgrown their current premises. There is a situation of demand for more worship space that is in part suppressed because of issues of high cost and scarcity of land and buildings. There are also issues with the planning system that impact on this situation such as refusals of planning approvals to locate at new sites. The scale of this issue is again greatest for Pentecostal churches, and interviewees pointed to the need for partnership with local authorities and government to help meet worship space needs, especially in places like Walthamstow and Brixton where communities are growing particularly fast. Some see sharing spaces as 'the obvious way forward' but not everybody suggested this was their preferred option.

3.2.5. There were a number of issues in relation to transport and access issues. It was interesting to note how well informed many communities are in relation to the sustainability implications of their worship space locations. Some have formal SD policies of which transport and access form a key part. Many have sought to locate near public transport nodes and lines and to maximise the use of transport forms which are the most environmentally benign and have the lowest impact on neighbours. These include encouraging use of bus and tube and organising shuttle buses and car sharing arrangements.

3.2.6. Car parking remains a big issue. This is especially problematic for worship spaces located in outer London with poor or nonexistent public transport connections. It is also a vexed issue for faith groups with particularly large congregations with wide spatial catchments such as Pentecostal/Charismatic churches. Perhaps unsurprisingly, given their spatial circumstances, these faith communities see a need for greater car parking provision. The initial conclusion is that the building in the most sustainable forms of access needs to be emphasised in new provision but this is likely to be something with which faith communities - especially larger ones and those located in outer London - will need to address with considerable support.

3.2.7. Almost all the faith communities interviewed thus far provide some level of wider services to their community around their worship space, demonstrating their faith through service to others. These activities can cover both a physical community and communities of interest. Some larger faith communities offer a very wide range of types of support ranging from spiritual and religious, through social inclusion, cultural, training and education,

economic development and capacity building. Some have cross-subsidised some community services with other activities, making excellent use of their building stock assets in this way.

3.2.8. For newer groups such as Pentecostal churches, lack of adequate space is thought to be limiting their capacity to fulfil their welfare programmes. Many groups, both large and small, are also involved in increasing literacy about faith issues. A number make the point that they are acting in ways in line with government policy and stated views about the role of faith communities in relation to urban regeneration. The conclusion they have reached is that they do not really understand why this service provision role is not supported more wholeheartedly.

3.2.9. Many faith groups undertake home-based as well as centre-based worship. In some faith cultures, for example, home shrines and meditation spaces are common. A home church movement is growing. Pentecostal churches are apparently diversifying into home based worship to help deal with space constraints. This appears to be a pragmatic response rather than an unconstrained choice. For many, worship at their religious space is a requirement for at least some of their worshippers. For others there is a strong preference to share worship with other worshippers.

3.2.10. Thus the initial conclusion is that for them home-based worship will never be able to replace worship at a shared space but will compliment it. Similarly, while there is support for shared worship spaces possibly along a multi-faith model this will not replace the need for worship spaces for individual faith communities.

3.3. Planning system experiences

3.3.1. We learnt above that experiences with planning applications vary widely. Some have had very straightforward relationships with planning authorities and spoke of good levels of pre-application advice and support, and no problems in obtaining planning permissions.

3.3.2. A number said they thought councillors' views were very important in determining whether or not they would succeed in obtaining approvals. One suggested that their council leader being Asian had helped in terms of cultural sympathy and this had declined once this leader had left their post.

3.3.3. Some interviewees reported either first hand difficulties experienced by their own faith community or examples of problems encountered by others in the planning approval process. A particularly negative example - Kingsway International Christian Centre which was refused planning approval by LB Havering after being persuaded out of the Olympics site - was felt to be symptomatic of the issues faced by larger scale applications. There was a perception that bigger planning applications were more likely to be refused due to greater local opposition to them. Other issues were about the difficulties inherent in dealing with heritage-listed buildings and the complexities of the planning system at the same time.

3.3.4. Only one interviewee felt that their large, long-established faith community had sufficient in-house expertise to work their way through the system successfully. Others felt they had been on a learning curve and had increased their capacity in planning, architecture and design over the course of a long-term planning/building application.

3.3.5. For a number, the problem of lack of expertise was compounded by the cost of hiring these skills in and this was felt to have had a negative effect on some faith groups' chances of realising their building aspirations. One group

felt they had been subject to stricter controls than their neighbours appeared to have been in terms of building heights and other restrictions. The system was also felt to be quite unfriendly to users with planning language described by one interviewee as 'double Dutch' only understood by a 'professional elite'. Once again, too, the issue of cultural sensitivity was raised with a perception of a lack of 'faith literacy' and less support than could have been shown by planning authorities.

3.3.6. The overall planning process therefore brought up a number of issues. Planning staff were felt to have been supportive throughout the process in a substantial number of cases, including helping communities monitor and minimise adverse local impacts such as car parking and noise. However this was by no means uniform. Some felt their council disappeared from view once their worship space was developed. Another community said that the local authority had only 'bought in' to working positively with them some way into the planning process. However, they then were able to report slowly improving relationships with their local authority, which for example helped identify external regeneration funds. They developed what appeared to be akin to a partnership working arrangement by the end of the process.

3.3.7. All of those interviewed said they were happy to share worship space resources across boroughs. Many in fact have large spatial catchments and draw worshippers from many parts of London. All subscribed strongly to the principle of inclusivity - that worship space should be open to all.

3.3.8. There are worship space expansion plans or aspirations among almost all the communities interviewed. Some communities want to expand or refit their current worship and related spaces. An initial conclusion is that for Pentecostal churches (and to a lesser extent some other communities) these issues are particularly critical; with costs, scarcity of sites and planning problems all acting as barriers to their aspirations to find large, well located and affordable sites for their rapidly expanding congregations.

3.4. Growth issues

3.4.1. Following on from the points made above, all of those interviewed reported that their faith community is growing rather than declining but the speed, scale and spatial location of growth varies widely. For the more rapidly expanding communities such as Pentecostal and Evangelical churches, Muslims and possibly Hindus, the problems noted in the last section are sharpening. As noted in the Section 2, the problem of insufficient space and inadequate options for addressing that problem appeared to be substantially worst for Pentecostal/Charismatic churches than for many others, but also possibly a significant issue for Muslim faith communities.

3.4.2. An initial conclusion made by interviewees is that the Pentecostal and Evangelical churches (and possibly others) need more support. This could be related to thinking about their worship space needs when building big new community facilities like conference, sporting and cultural venues. It could also encompass better 'process' based arrangements like help in negotiating their way through the planning and heritage systems; assistance on identifying and securing external funding sources; partnership working with local authorities in both an urban regeneration and new development context; and formation of independent faith advisory groups at Borough level.

3.5. Potential solutions

Using redundant space

3.5.1. Interviewees proposed a number of potential solutions to the issues they raised through the interviews. The idea of using redundant space for worship was generally supported and this was a strategy that had been used by a number of communities, especially given issues with planning permissions for new spaces:

It is difficult to get planning permission for a worship place in London. Redundant churches would work well because their use for worship is already established. So there are less likely to be objections from residents about comings and goings.

3.5.2. Some had experienced barriers, however, such as insufficient funds to bring their reuse plans to fruition. The idea of turning 'eyesores' in east London to worship spaces as part of the post Olympics legacy appealed to one interviewee.

Shared and multi-faith space

3.5.3. The initial conclusion is that shared space - possibly long the lines of the multi-faith space model - will be a suitable way forward for some communities but not suitable for everybody as a replacement for their own space:

We support the idea of multi-faith centres in general – they are good for harmony and peace. But this building itself would not be suitable for a multi-faith centre.

3.5.4. While larger communities have shown themselves to be willing to share space with smaller emergent groups to a considerable extent, it was felt that a normal part a faith community's growth was its desire to have its own worship space. The suitability of multi faith spaces was also tied to perceptions about the current size and expectations around expansion of different faith communities in particular areas:

In this area, there are not so many Muslim people or Hindus, so it is not necessary to have multi-faith centre in this area. It's the Buddhist community that is growing. We are likely to have doubled or tripled our congregation after 10 years. So we will need a special place in this area.

Partnership working

3.5.5. A number of interviewees suggested that partnership working between faith communities and local authorities was likely to be a fruitful area but local authorities need to demonstrate more commitment to this idea in future. Equally closer engagement with the GLA was felt to be important to pursue worship space needs and make sure policy and practice fitted together better.

Training in faith literacy

3.5.6. Some interviewees saw the need for faith literacy training by local and central government officials and elected members to increase understanding about both faith and its links to cultural diversity. It was pointed

out that one outcome of such training, by increasing awareness and understanding, would be to help refine public policy in this area. A related area of education was thought to be needed by planners so they could help make the planning system more user-friendly. This should aim to overcome its alienating language and increase the chances of faith communities being able to put in successful planning applications.

And finally...

3.5.7. This paper provides initial conclusions based on the data collected from the engagement process thus far. However, it is already possible to see some clear themes emerging, some of which we will follow up through the planning 'side' of the research. We will add any findings from further consultative work undertaken in the rest of the project and together this material will form part of the analysis for the final report.

3. Planning Research Paper – survey of London Planning Authorities

The following paper on the planning research aspects was prepared part way through the project. It provides a summary of findings up to early March 2008.

1. Introduction

1.1 Purpose and Scope of the Planning Questionnaire

1.1.1. A questionnaire was circulated by e-mail to a planning policy officer and a development control officer in each London Borough. The questionnaire was sent on Friday 21st December, 2007 with a response deadline of Monday 14th January, 2008. The questionnaires were sent to planning policy officers by Land Use Consultants, and those to development control/enforcement officers were sent via the Secretary of the Association of London Borough Planning Officers (ALBPO) Development Control Sub Group, as requested by GLA. However, it was requested that a single coordinated response was provided by each Borough.

1.1.2. The main purpose of the questionnaire survey was to try to establish current patterns of demand by faith communities for places of worship and how such demand is being met through the planning system in London. As this requires a combination of both qualitative and quantitative data, questions were developed that sought to determine the nature and extent of planning policy for places of worship and how such policy is being used to determine applications for places of worship through the development control process.

1.1.3. A copy of the questionnaire is provided in the Evidence Report, accompanying the Final Report. It was broken down into two main sections, Forward Planning and Managing Development, to allow both planning policy officers and development control officers the opportunity to provide accurate data on established/emerging policy (qualitative data) and planning applications (quantitative data).

1.1.4. Questions relating to Forward Planning sought to establish existing and/or emerging planning policy on determining applications for places of worship and whether such policy has been informed by a detailed assessment of need for places of worship. Questions relating to Managing Development sought information relating to pre-application advice, consultation arrangements, objectors concerns and the use of planning conditions in determining applications for places of worship. Details on planning applications for places of worship since 2000 were also sought in order to determine the number of applications being submitted for places of worship and how many of these were being granted or refused.

1.2. Response Rate

1.2.1. Twenty two of the 33 London Boroughs responded to the questionnaire, providing a 67% response rate. Boroughs that responded to the questionnaire are as follows:

Barnet
Brent
Bromley
Camden

City of London

Hackney
Hammersmith & Fulham
Haringey
Havering
Hillingdon
Hounslow
Kingston
Lambeth
Lewisham
Newham
Redbridge
Southwark
Sutton
Tower Hamlets
Waltham Forest
Wandsworth
Westminster

1.2.2. LUC analysed the responses, using an Access database linked to a Geographical Information System.

2. Broad findings of the Survey

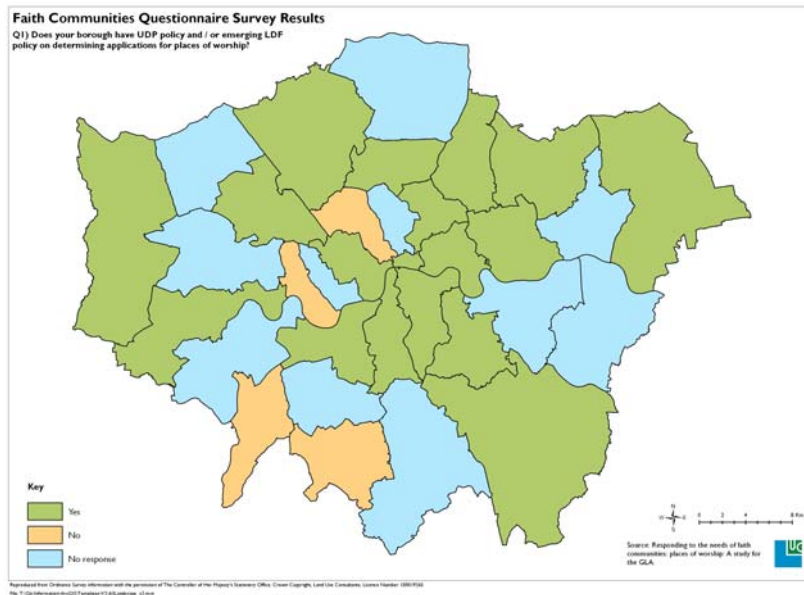
2.1 Policy Coverage (Refer to Map Q1 & Q2)

2.1.1. Out of the 22 responses, all but three of the boroughs that responded have existing UDP policy, and would expect emerging LDF policy, on determining applications for places of worship. However, such policies are often generic and broad in scope, covering the wider provision of social and community facilities, which includes places of worship, as opposed to specific policy for determining applications for places of worship. The London Boroughs of Barnet, Brent, City of London and Hounslow were the only respondents that currently have UDP policy relating specifically to the provision of places of worship.

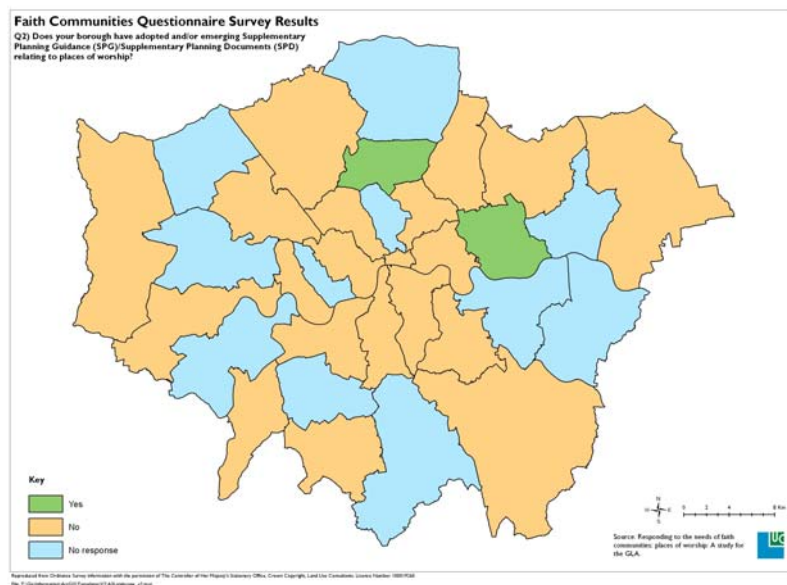
2.1.2. There is some evidence that, whilst some UDPs include specific policy on places of worship, policy in emerging LDFs tends to be more general, focusing more broadly on community facilities. This approach is consistent with London Plan Policy 3.18A, which covers a wide range of social and community infrastructure issues.

2.1.3. Only the London Boroughs of Haringey and Newham reported that they have adopted and/or emerging Supplementary Planning Guidance/ Documents (SPG & SPD) relating to places of worship. However, the guidance is wider in scope, covering buildings suitable for community facilities and meeting places. Although this includes places of worship and associated facilities, such guidance does not cover specific planning considerations for determining planning applications for places of worship.

Map Q1. Boroughs with UDP and/or Emerging LDF Policy on Determining Applications for Places of Worship



Map Q2. Boroughs with Adopted and/or Emerging SPG Relating to Places of Worship



2.2. Perceptions about Adequacy of Provision

2.2.1. Responses regarding the adequacy of provision for places of worship were varied. Just over a third of the boroughs that responded (eight boroughs) have reason to believe that existing provision of places of worship within their Borough is inadequate; however, six of the 22 responses had reason to believe existing provision is adequate. The remaining respondents were uncertain as to whether existing provision in their Borough was inadequate.

2.2.2. Several London Boroughs (Brent, Lewisham, Southwark, Waltham Forest, and Westminster) reported that they are experiencing considerable growth in the population of ethnic minorities, which is generating a large demand for new and expanded places of worship. This particularly applies to specific faith groups, notably African (Pentecostal) and Muslim groups. All London Boroughs

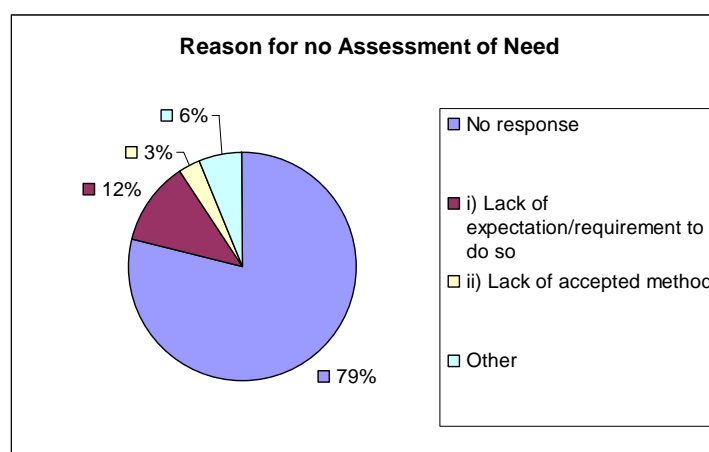
that believe current provision is inadequate identified significant problems in finding sites that offer appropriate accommodation.

2.2.3. Given insufficient provision to cater for this growing demand in town centres, it is evident in these boroughs that faith communities are establishing places of worship in outlying industrial and employment areas to accommodate growth, often without planning permission. This corresponds with the overall issue of supply not meeting demand in permitted places of worship. This was identified as a significant issue in the London Boroughs of Bromley, Hackney, Newham and Southwark.

2.2.4. Two boroughs, Brent and Kingston upon Thames, identified a consistent gain in floor space for places of worship over the past five years as a result of growth in the population of ethnic minorities within their Borough. For example, Brent has seen a growth of 4,840m² floor space for places of worship within the past 5 years, indicating a considerable need for further places of worship in the Borough.

2.3. Assessment of Need for New Provision

2.3.1. When asked if UDP policy and/or emerging LDF policy on determining applications for places of worship was informed by a qualitative or quantitative assessment of need, the majority of responses indicated that an assessment of need had not been undertaken before developing policy. The majority of respondents stated that this was due to 'a lack of expectation/requirement to do so'.



2.3.2. Those who stated that they had undertaken an assessment of need had done so through either a qualitative assessment or on a case-by-case basis when determining planning applications for places of worship. Those that have undertaken a qualitative assessment had done so through consultation with faith groups during the development of their UDP or LDF. Those that determine applications on a case-by-case basis consider the number of existing places of worship within the area, accessibility by public transport and access for those with disabilities. It is not clear from the responses whether the assessment of need takes account of all places of worship or just those relevant to the applicant faith group.

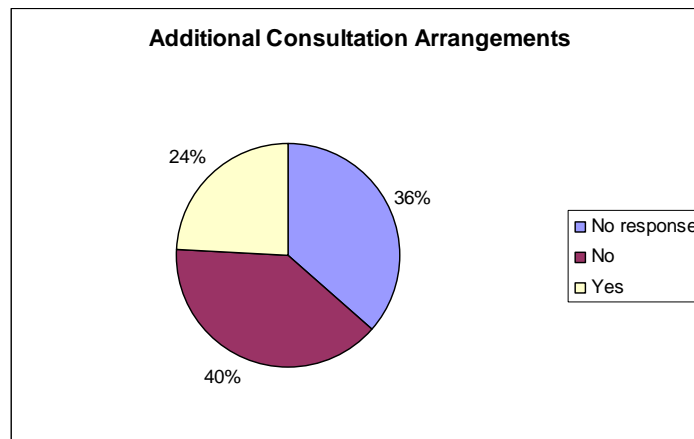
2.4. Pre-Application Advice

2.4.1. The majority of respondents stated that they were unable to quantify the number of proposals for places of worship that have been the subject of pre-application discussions since 2000, but where no subsequent application was made. Those who were able to quantify the number of discussions provided estimates between 1 and 5.

2.4.2. It was suggested that some faith groups are not fully aware of the opportunity to obtain pre-application advice and of its value. This may correspond with the growth in establishment of places of worship as non-conforming uses.

2.5. Consultation Arrangements

2.5.1. When asked if any of the London Boroughs use any consultation arrangements for applications seeking to develop/extend places of worship that go beyond statutory consultation arrangements, the majority of respondents (13) stated they do not have any additional arrangements. Those who do go beyond statutory requirements for consultation stated that they provide letters informing local residents and businesses of the proposed development, inviting them to provide their views on development proposals and/or attend local area development control forums.

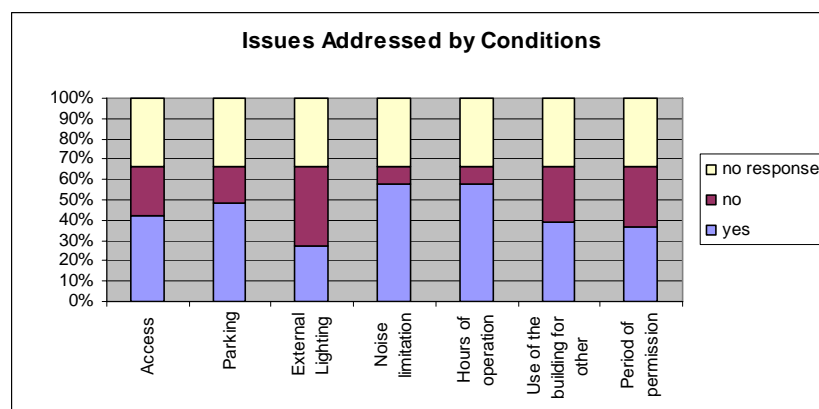


2.6. Objectors' Concerns

2.6.1. The principal concerns of consultees with regard to planning applications for places of worship were the impacts of traffic, parking and noise.

2.7. Use of Planning Conditions to Address Objectors' Concerns

2.7.1. In determining applications for places of worship, the issues that are generally addressed by conditions are as follows:



2.7.2. Out of the 22 responses, 12 Boroughs indicated that they use planning conditions to grant temporary planning permission for use of buildings as a place of worship. The use of such a condition allows the planning authority to assess the impact of use as a place of worship on the local community before granting permanent planning permission.

2.8. Use of Planning Conditions to Protect Places of Worship

2.8.1. Planning conditions can be used to restrict certain types of development within a Use Class. In determining planning applications for a new place of worship, 10 of the 22 respondents stated that they use conditions to prevent the subsequent use of the building for other activities within the D1 Use Class, of which 5 of the 10 respondents 'always' use such conditions. Out of the remaining 12 respondents, seven stated that they do not use such conditions to protect places of worship from changing use for other activities within the D1 Use Class. The remaining respondents failed to respond to this question.

2.9. Use of Planning Conditions to Prevent Places of Worship in D1 Use Class Permissions

2.9.1. In granting planning permission for a community use (D1) (non-residential institutions), 10 of the 22 respondents stated that they impose conditions that would prevent the use of the building as a place of worship, of which 5 of the 10 respondents 'always' impose such conditions. Out of the remaining 12 respondents, eight stated that they do not use such conditions to prevent a change of use to a place of worship. The remaining respondents failed to respond to this question.

2.9.2. When asked if any of the London Boroughs make use of Section 106 Agreements to address planning objections for places of worship, or to reinforce planning conditions, 6 of the 22 respondents stated they 'sometimes' make use of legal agreements.

3. Data on Planning Applications

3.1. Level of supply and demand

3.1.1. In order to determine the level of supply and demand in quantitative terms, it is important that details of planning applications reveal overall gains and losses of places of worship. As such, information was sought regarding the number of planning applications for places of worship submitted since 2000, a brief description of proposals (including the proposed increase/decrease in floor space), and the planning decision.

3.1.2. A combination of data obtained from questionnaire responses and the London Development Database (LDD) on planning applications for places of worship in London identified 602 planning applications that have been submitted for places of worship since 2000. Given the nature of the D1 use class, many boroughs were unable to distinguish applications specifically relating to places of worship within their databases and could therefore only provide us with applications for proposed D1 use.

3.1.3. As such, a filtering process was undertaken to remove applications pertaining to other D1 uses, as opposed to places of worship, to get a final number of 602 relevant applications. It should be noted that where the decision of planning applications was not provided by the local authority but a permission status of 'not started' was given, it has been assumed that planning permission has been granted by the LPA.

3.1.4. The 602 planning applications were distributed between the Boroughs as follows. Those Boroughs who did not provide information on planning applications through the questionnaire are identified in italics. For these Boroughs, details on planning applications came only through the LDD.

Number of Applications by London Borough			
<i>Barking & Dagenham</i>	6	Hounslow	3

Barnet	11	<i>Islington</i>	12
<i>Bexley</i>	3	<i>Kensington & Chelsea</i>	3
Brent	41	Kingston	3
Bromley	36	Lambeth	122
Camden	15	Lewisham	10
City of London	3	<i>Merton</i>	2
<i>Croydon</i>	15	Newham	7
<i>Ealing</i>	22	Redbridge	18
<i>Enfield</i>	3	<i>Richmond upon Thames</i>	4
<i>Greenwich</i>	3	Southwark	8
Hackney	11	Sutton	3
Hammersmith & Fulham	22	<i>Tower Hamlets</i>	10
Haringey	29	Waltham Forest	1
<i>Harrow</i>	6	Wandsworth	48
Havering	4	Westminster	28
Hillingdon	1	Total	602

4. Analysis of Planning Applications

4.1 Approvals

4.1.1. Overall, 73% of the applications were approved (436 out of 602); however this figure should be treated with caution, as this relates to all applications, including those involving a net loss of places of worship. Of the remaining applications, 13% were refused (79), 7% were withdrawn (40) and 7% were deemed 'uncertain' (44), as not enough information was provided to determine the outcome of applications.

4.1.2. When broken down by type of application, ten different types of application were submitted relating to a place of worship:

Type of Application	Number of Applications
Certificate of Lawfulness	1
Change of Use	217
Demolition	2

Extension	54
Listed Building Consent	2
Mixed	2
New Development	156
Redevelopment	157
Renewal	10
Variation	1
Total	602

4.1.3. The majority of planning applications submitted (86%) were for change of use of a building to/from a place of worship (36%), new development (26%) and redevelopment (26%).

4.2. Change of Use

4.2.1. Of the 217 applications for change of use involving a place of worship, 160 (73%) were changes to a place of worship from another use. Most of these were applications to change from an employment use to a place of worship. 57 (26%) were changes from a place of worship to another use (mainly residential). The rate of approval of applications for changes of use to places of worship was 54%, with a further 8% of such applications being withdrawn before the local authority made a decision. 90% of applications for changes of use from a place of worship were approved and none was withdrawn.

Change of Use		Total Applications	
To a place of worship	160 (73%)	Granted	87 (54%)
		Refused	46 (29%)
		Withdrawn	12 (8%)
		Pending	2 (1%)
		Don't know	13 (8%)
From a place of worship	57 (26%)	Granted	51 (90%)
		Refused	3 (5%)
		Withdrawn	0 (0%)

		Pending	0 (0%)
		Don't know	3 (5%)

4.3. New Development

4.3.1. Of the 156 applications for the development of new place of worship 73% were granted permission. A further 13% of such applications were withdrawn before the local authority made a decision. As with changes of use, we were unable to ascertain the reasons for withdrawal of applications, but it may follow advice from the local authority that refusal of planning permission is likely.

Total Applications		
156 (73%)	Granted	114 (73%)
	Refused	17 (11%)
	Withdrawn	20 (13%)
	Pending	1 (1%)
	Don't know	4 (3%)

4.4. Redevelopment

4.4.1. Of the 157 applications for redevelopment, 54% involved an existing place of worship. 89% of these applications were approved. However, the data does not reveal accurately whether the redevelopment results in a net loss or gain of floor space for worship. From the application descriptions it can be surmised, however, that the general trend is a contraction of floor space for worship with a corresponding increase in other uses. Typically, this has involved redevelopment of a site to create a new, smaller space for worship and the development of flats above or adjacent.

4.4.2. There were in addition 23 applications for redevelopment of a site that involved a net gain of a place of worship. However, we were unable to ascertain the precise amount of new floor space created. 96% of such applications were approved. The remaining 85 applications for redevelopment involved a net loss of places of worships. 89% of such applications were approved.

Redevelopment resulting in:	Total Applications		
	Gain of place of worship	23 (15%)	Granted
		Refused	0 (0%)
		Withdrawn	0 (0%)
		Pending	0 (0%)
		Don't know	1 (4%)
Loss of place of worship	49 (31%)	Granted	43 (88%)
		Refused	0 (0%)
		Withdrawn	3 (6%)
		Pending	0 (0%)
		Don't know	3 (6%)
Redevelopment of existing place of worship	85 (54%)	Granted	76 (89%)
		Refused	4 (5%)
		Withdrawn	2 (2%)
		Pending	0 (0%)
		Don't know	3 (4%)

5. Limitations of the Data

5.1. Overview

5.1.1. Despite the data provided above, there are a number of limitations regarding the data on planning applications for places of worship.

5.1.2. Not all London Boroughs provided details on planning applications for places of worship received since 2000 through the questionnaire and so the study could only include applications for these boroughs from the LDD. However, the minimum threshold for applications to the LDD is 1000m², and so planning applications for places of worship in the LDD only cover those applications that have a proposed floor space above the LDD threshold. As such,

planning applications submitted within these boroughs that fall below the LDD threshold have not been included within this study.

6. Additional Data on Gains and Losses in Floor Space

6.1. More specific data

6.1.1. In order to provide a more comprehensive understanding of the overall gain or loss in floor space for places of worship in London more specific data on proposed D1 floor space for each planning application was needed. This information was provided for only 263 of the 602 planning applications received from LPAs and the LDD, making it difficult to determine whether the demand for places of worship has been met by the planning system since 2000.

6.2. Data Limitations and further work

6.2.1. We therefore sought to obtain the details of the remaining 339 applications by scrutinising the planning applications on the Boroughs' websites through on-line planning databases. Having expended a number of days on this exercise, it became clear that most Boroughs' on-line databases did not provide electronic copies of planning applications that preceded 2004/2005. This would have then required obtaining hard copies of approximately 300 applications to determine proposed floor space. As such, obtaining details of these applications was unachievable given the timeframe of this research study.

6.1.3. However, further work was undertaken on the types of planning applications for places of worship and the rates of approval and refusal for specific types of application in order to provide a more accurate picture of the overall gain or loss of places of worship within London. The findings of this work are set out above.

6.1.4. Further work was also undertaken in relation to planning appeals for places of worship. Analysis of the findings of planning appeals is set out below.

7. Planning Appeals

7.1. Overview

7.1.1. Out of the 602 planning applications received relating to a place of worship, 27% were refused planning permission. Using the Compass Planning Appeals Service, a search of planning appeals in London identified 15 planning appeals since 2000. Of these 15 appeals, five were upheld and 10 were dismissed. Table 1 shows the types of planning appeals in relation to places of worship and the number of those that were upheld and dismissed.

Table 1. Analysis of Planning Appeals

Types of Planning Appeal	Number of Appeals since 2000	Number upheld	Number dismissed
Against refusal of planning permission for places of worship on employment /	6	2	4

industrial site			
Against refusal of planning permission to vary planning conditions	3	1	2
Against refusal of planning permission for change of use to place of worship from a shop	1	1	0
Against refusal of planning permission for change of use from a place of worship to a live / work units	1	0	1
Against enforcement notice served on a place of worship in employment / industrial site	3	1	2
Against enforcement notice served on a place of worship in residential building	1	0	1
	15	5	10

7.2. Analysis of Planning Appeals

7.2.1. The majority of appeals were against refusal of planning permission for places of worship on employment/industrial sites and enforcement notices served on a place of worship in an employment/industrial site (9 out of 15 appeals). Of these, 3 appeals were upheld and 6 were dismissed. Reasons for upholding and dismissing these appeals are set out below:

Reasons for upholding appeals against refusal of planning permission

7.2.2. We looked at reasons for upholding appeals against refusals for place of worship on employment/industrial sites:

- Proposal would provide community with significant support services
- Council were unable to provide suitable alternative premises
- Proposal would occupy an old building that has been vacant and marketed for a long period of time
- Proposal would provide a significant number of jobs, similar to the number provided if site was retained for employment/industrial use
- A high level of vacant land in defined industrial areas and so approval of the proposal would not result in a shortage of employment sites
- Proposal would not adversely affect highway or personal safety
- Proposal is within walking distance of good public transport links
- Lack of suitable alternative premises, particularly in town and local centres

Reasons for upholding appeals against enforcement notices

7.2.3. We explored Reasons for upholding appeals against enforcement notice served on a place of worship in employment/industrial site:

- Appellant provided sufficient evidence to prove the legal use of the premises has been as a place of worship for over 10 years, and so the enforcement notice was quashed

Reasons for dismissing appeals against refusal of planning permission

7.2.4. We identified reasons for dismissing appeals against refusal of planning permission for place of worship on employment/industrial sites:

- Failure to justify the loss of employment use and marketing of the building over a period of at least a year before being used as a place of worship
- Living conditions of local residents have been harmed by noise and disturbance
- Imposition of conditions would not overcome the problems already being experienced to make the use acceptable
- Traffic congestion and conflicting vehicle movements would cause unacceptable potential danger to users of local streets
- Proposal would be damaging to the supply of B1 employment premises and would conflict with UDP policy on employment use
- Proposal is within area of London-wide importance for B1, B2 and B8 uses

Reasons for dismissing appeals against enforcement notice served on a place of worship in employment/industrial site

7.2.5. We explored reasons for dismissing appeals against enforcement notice served on a place of worship in employment/industrial site:

- Loss of the appeal site as an employment site would undermine the aims of UDP policy on safeguarding employment sites
- Poor transport links surrounding appeal site
- Development would compromise the 2012 Olympic Bid (appeal site falls within Olympic regeneration area)

7.2.6. There was one case of an appeal against an enforcement notice being served on a place of worship in a residential building. This appeal was also dismissed due to the level of activity associated with the place of worship exceeding what is normal for the area and would cause material harm to the amenity of other residents. This was supported by the substantial level of parking within the residential area that would result from the use being approved. These reasons for dismissal correspond with the main objectors concerns identified in the survey of LPAs, i.e. impacts of traffic, parking and noise.

7.2.7. There were a number of appeals against the refusal of planning permission to vary planning conditions (3 out of 15 appeals). Two of the three appeals for permission to vary planning conditions were to allow the appeal site to operate as a formal place of worship in addition to religious education and instruction. Both of these appeals were dismissed, which corresponds with the data provided through the survey of LPAs that shows a considerable number of LPAs using such conditions to prevent the use of a building as a place of worship. The other appeal related to extending the hours of operation of a place of worship to take account of a particular religious holiday. This appeal was upheld. Reasons for upholding and dismissing these appeals are set out below:

7.2.8. The reasons for upholding appeals against refusal of planning permission to vary planning conditions were:

- Other surrounding buildings within the residential area operate to 11pm
- No nuisance is alleged from the use itself, not did the Council contend there would be problems from traffic and parking at that time of evening

7.2.9. The reasons for dismissing appeals against refusal of planning permission to vary planning conditions were:

- Proposal would exceed the Council's threshold for meeting places in residential areas
- Proposal would cause an adverse impact on residential amenity and traffic conditions

7.2.10. There was also an appeal against refusal of planning permission for a change of use to a place of worship from a shop, as well as a change of use from a place of worship to live/work units. The appeal for a change of use to a place of worship was upheld and the appeal for a change of use to live/work units was dismissed. Reasons for upholding and dismissing these appeals are set out below:

7.2.11. The reasons for upholding appeals against refusal of planning permission for change of use to place of worship from a shop were:

- Operation of use had not given rise to any significant adverse implications for road safety that could not be resolved through existing on-street parking controls
- Continuation of use would not cause unacceptable levels of disturbance in the immediate locality
- Conditions imposed on proposal regarding hours of operation and noise insulation

7.2.12. The reasons for dismissing appeals against refusal of planning permission for change of use from a place of worship to live/work units were:

- Would result in the loss of a community facility contrary to the provisions of the Development Plan and outweighs the lack of harm in relation to employment floor space

7.3. Additional Data on Enforcement Notices

7.3.1. A limitation of the data on planning applications for places of worship is that the data currently does not take account of places of worship operating within London without planning permission. Further information on enforcement notices issued by LPAs in relation to non-conforming use of buildings as places of worship is an important aspect of the overall issue the project is addressing. Obtaining such data on enforcement notices would provide a more robust reflection of the level of demand, the lack of understanding amongst faith groups on the need for planning permission, the costs to London Boroughs for taking enforcement action and the impact on 'legitimate' land uses in employment and industrial areas.

7.3.2. As such, additional data on the number of places of worship and the amount of floor space that have been subject of enforcement action since 2000 and the subsequent outcome (i.e. grant of planning permission, Certificate of Lawfulness, appeal and outcome of appeal) would provide a more robust evidence base to support the findings of the study.

4. Case Studies - Experiences of the Planning System

1. Introduction

The following case studies document some examples of best practice and lessons for the future from faith communities' experience in and outside London, as well as demonstrating some issues emerging with the planning system.

2. Redevelopment of a Church site within a central location

2.1. In the face of high land values and considerable development pressures, it is increasingly difficult to retain community and religious buildings in central locations. The problem is often more acute in the case of historic buildings that are expensive for faith groups to maintain.

2.2. The Highbury Baptist Church in Islington found an innovative solution to these problems that were compounded by the fact that their Church was too large and did not lend itself well to the worship and community uses they desired. This involved applying for planning permission to demolish the Church and to build a new one, together with three flats on the same site as the demolished Church. The residential component would generate funds to enable the continued use of the central location. The Church group demonstrated that the cost of restoration of the Church would be greater than the cost of rebuilding it.

2.3. After three refusals of planning permission on the grounds of adverse impacts on the surrounding Conservation Area (Appeal Ref. APP/V5570/A/99/1029793), the Church appealed to the Secretary of State. The Planning Inspector upheld the appeal and granted planning permission, thereby securing the future of the Church on the same site. In reaching his decision, the Inspector clearly considered that the benefits of retaining the Church use on the site would outweigh any adverse impacts on the Conservation Area.

3. Realising opportunities in designated employment areas

3.1. In 2006 the London Borough of Croydon refused planning permission for the use of a building in the New Addington Employment Area as a Christian Resource Centre – to include a place of worship and a day nursery and provision of associated parking. The building had been vacant for two years prior to the application, despite the owner's attempts to market it for over 21 months. There were also other premises in the employment area that were available for re-occupation. The existing church operated in premises that limited its ability to provide and develop its services to its congregation. The council was unable to suggest alternative possibilities for the Resource Centre in the locality.

3.2. The relevant Unitary Development Plan policy on designated employment areas provides that planning permission will not be granted for changes of use from B1(b), B1 (c), B2 or B8 unless there are unacceptable environmental or traffic problems. On the other hand, other Unitary Development Plan policies are supportive of community-based proposals, indicating that they will be permitted subject to certain criteria.

3.3. The applicant appealed to the Secretary of State against refusal of planning permission. The appeal was upheld by a Planning Inspector who granted planning permission. In reaching his decision, the Inspector attached considerable weight to the proposal, noting in particular that the Centre would employ a large number of people, in fact well in excess of the number employed by the previous occupants of the premises. He also noted that the centre would provide the community with significant community support services. Given that the building is situated at the edge of the employment area and is highly accessible, together with the other specific circumstances of the appeal site, the Inspector advised that the decision should not be seen as a weakening of the Council's strategic approach to the provision of land and premises for employment.

4. Role of Faith Partnerships in assessing needs

4.1. Camden's Faith Communities' Partnership, which is supported by the Council and includes representatives from across the faith communities in the borough, has been promoting a purpose built Islamic Cultural Centre and mosque in the borough. The Council's Faith Officer has facilitated discussions with the Borough's planners concerning the policies of the emerging Local Development Framework and specific opportunities for developing the centre.

4.2. The Partnership identified that Muslims make up over 11% of the borough's population, including many people of Bangladeshi origin, a significant and growing Somali community, and people of Eastern European, Middle Eastern and other backgrounds. The Muslim population is concentrated in the south of the borough – in King's Cross, Regent's Park, and St Pancras and Somers Town wards; but there are significant Muslim populations in all wards. Camden's Muslim population is relatively young, with over half under the age of 25, and relatively deprived, with unemployment double the borough average and 65% of the population living in social housing.

4.3. The existing prayer centres and mosques in the borough are not purpose built, with three operating in Council owned premises. There are clear issues of capacity, with particular pressure around Friday prayers leading to congregations using other premises, staggering prayer times and, in some cases, worshippers praying outside the centre in courtyards. Some of the centres are used for other activities, including for young people – although again, there are issues of capacity. Having a purpose built Islamic Cultural Centre and mosque in the borough would help address these issues, ensuring that Camden's significant and growing Muslim population had access to suitable prayer facilities and a space that could be used to provide community and other services, including for young people and vulnerable groups.

4.4. On the basis of the representations and persuasive arguments that were made, the Council has supported the Muslim communities' desire to see a purpose built Islamic Cultural Centre and mosque in the borough. They shared the Partnership's view that it would provide an important piece of civic infrastructure, catering for the spiritual and pastoral needs of a large proportion of the borough's population as well as providing a shared social space and base for outreach and cohesion building activities, across Camden's diverse communities.

5. Developing a 'standards' based approach to provision

5.1. Outside London, Cambridgeshire Horizons commissioned consultants Three Dragons to identify best practice in provision for faith communities in major new developments. Following consultation with faith communities they assumed, as a key principle, that faith buildings in major new developments (of more than

2000 dwellings) should be planned-in from the start. They developed a 'standards' based approach, based on assumptions about place of worship attendance. In terms of Christian churches, they suggested that 2000 dwellings would generate about 270 churchgoers (6% of a population of 4500 people).

5.2. Further, Three Dragons suggest that there should be standard provision of land for faith groups in much the same way as there is provision for a range of other community facilities. A figure of 0.5ha of free or heavily discounted land is suggested per 3000 homes. The rationale for the 0.5ha figure is based on experience of Cambourne and Milton Keynes, which suggests that a site of less than 0.5 ha is too small to provide adequate space to serve a growing congregation and support a range of community facilities. Actual provision could be in the form of land or buildings depending on the built form of the development and the known requirements of the faith groups. It can be viewed as provision in kind or as a financial contribution to support the provision of facilities, which must be directly related to the development, but need not necessarily be within it.

6. Taking a positive approach to faith consultation

6.1. The unauthorised use of industrial buildings by faith groups for places of worship has been identified as the most significant breach of planning control involving change of use in Southwark. It is considered to be taking place at a larger scale than in any other London Borough. Existing policy in Southwark's Unitary Development Plan seeks to protect business, industrial and storage activities as a means of preserving employment within the Borough.

6.2. There is a lack of suitable existing buildings classified as D1 Use Class (Non-Residential Institutions). The rapid growth in the number and size of faith groups in the Borough has created additional pressure on established places of worship. There are thought to be some 350 faith groups in the borough, especially in the SE15 (Peckham) area.

6.3. The Council has been working through its Community Involvement and Development Unit (CIDU) and the borough's multi faith forum. By means of a questionnaire survey, the Council has undertaken an assessment of the sites within the Borough currently being used as places of worship. The outcome will provide a much more comprehensive understanding of the activities and development requirements of faith groups, adequacy of current provision, and travel patterns.

7. Effective use of planning policy to protect existing places of worship

7.1. In 2003 the Brethren's Gospels Trust wished to dispose of their 500 seat place of worship and car park on Drayton Bridge Road, Ealing. The land use adjoining the 0.47 ha site was predominantly medium / high density residential. The Trust considered the site to have residential redevelopment potential.

7.2. The development plan at that time was the London Borough of Ealing Unitary Development Plan adopted August 1995 with First Alterations January 1998 and further alterations 2000. The revised Unitary Development Plan was at Public Inquiry. Both the adopted Unitary Development Plan and emerging deposit draft contained policies to resist the loss of existing community uses unless the developers made additional or replacement facilities through refurbishment or redevelopment and interim facilities were provided during the development. It was also a policy requirement to market redundant community facilities for a

reasonable time (at least one year). In the event of redevelopment, affordable housing would be acceptable in principle on sites in residential areas.

7.3. In the light of this, the Trust's planning adviser's, J&J Design, advised against an early planning application. They advised against doing so unless the Trust had identified an alternative site within the Borough or a vigorous marketing exercise had failed to result in substantial interest from alternative local community groups.

7.4. Given the restrictive planning policy context, the Trust decided to sell the site as an existing Place of Worship. It was purchased at auction by a Sikh organisation for about £2.7 million, an amount only marginally less than the site's value for residential development. The building is now the Central Gurdwara for the Sikh community.

5. Stakeholder Workshop Briefing Note

The following briefing note was sent out to around 60 invitees from faith communities and London planning authorities prior to a stakeholder workshop in March 2008.



Briefing note for workshop participants

Responding to the needs of faith communities: places of worship

For Stakeholder Workshop March 25th 2008

March 2008

1. Introduction	49
1.1. Purpose of the briefing note	49
1.2. Background to the research project	49
1.3. About the work - methods used	49
2. Findings from engagement with faith communities.....	50
2.1. Development needs	50
2.2. Planning system experiences	51
2.3. Worship space growth issues	52
2.4. Potential solutions	52
2.5. In summary	54
3. Findings from planning research	54
3.1. Developing the questionnaire	54
3.2. Broad findings of the questionnaire	55
3.3. Issues and current limitations with the planning data	57
4. Tentative conclusions to date.....	57
4.1. The policy context	57
4.2. Role of faith communities	58
4.3. Planning and development issues	58
4.4. Potential solutions	60
4.5. In conclusion	61

1. Introduction

1.1. Purpose of the briefing note

1.1.1. CAG Consultants with Diverse Ethics and Land Use Consultants have been commissioned to explore the needs of faith communities in relation to places of worship in London. The purpose of this briefing note is to provide information to stakeholders about the findings and tentative conclusions so far from the research and engagement process with faith communities and planning authorities in relation to places of worship.

1.2. Background to the research project

1.2.1. The background to the work is that London, as one of the most diverse cities in the world, is also set to experience significant economic and population growth over the next twenty years. This growth will present a unique set of challenges and opportunities, requiring an equally unique and flexible approach to planning in the capital.

1.2.2. The Mayor of London has a statutory duty to promote equality of opportunity, sustainable development and the health of all Londoners (GLA Act 1998, Section 41) and these three inter-related themes form the basis of the London Plan (Consolidated with Alterations since 2004). The London Plan contains policies that are aimed to respond to the needs of London's diverse communities (3A.17 and 3A.18) and Supplementary Planning Guidance on 'Planning for equality and diversity in London' has been produced to provide more detailed information to boroughs on how to implement this policy.

1.2.3. However, as part of the 'plan, monitor, review' approach taken towards the production of the London Plan, the Mayor is also keen to acknowledge and respond to particular issues emerging that may require a planning response. One such issue relates to the provision of places of worship and associated facilities for the growing congregations of some faith groups and in particular of black, Pentecostal churches that are largely made up of African and Caribbean populations.

1.3. About the work - methods used

1.3.1. The research to explore faith communities' worship space needs is being undertaken in a number of ways by CAG, Diverse Ethics and Land Use Consultants. We are:

- Undertaking structured interviews with members of a diverse range of faith communities and interfaith groups across London;
- Receiving on-line and postal forms of a questionnaire about development needs, issues and possible solutions
- Collecting and analysing a wide range of planning data from London Planning Authorities and other relevant sources that help build a picture of the way the planning system responds currently

- Developing a series of case studies of good and not so good experiences of faith communities with the planning system; and
- Holding this workshop to feed back results so far and receive views about solutions and recommendations for the future from interested stakeholders.

1.3.2. We will be taking into account views of stakeholders in developing our final report to the GLA from the whole range of research and consultation being undertaken through these methods.

2. Findings from engagement with faith communities

2.1. Development needs

2.1.1. A number of communities report unmet needs for expansion - there are particular difficulties for Pentecostal and Charismatic churches and Muslim communities, with high needs due to large, and growing numbers of worshippers but less resources than some established communities.

2.1.2. The expense and scarcity of new sites - land and buildings - is a substantial barrier to expansion.

2.1.3. There is a strong sense that there is a lack of faith literacy and cultural awareness by some councillors, planning and policy officials at local, regional and national level.

2.1.4. For most communities peaks in use of worship space are cyclical and times of peak demand can cause local impacts like noise and car parking.

2.1.5. Communities can find this especially difficult because they are outgrowing or have outgrown their current premises. One community commented that: "This is a problem for the temple, particularly for Krishna's birthday. The temple is bursting at the seams – people can't all fit in".

2.1.6. There are issues with the planning system that impact on this situation such as refusals of planning approvals to locate at new sites. The scale of this issue again appears greatest for Pentecostal/Charismatic churches.

2.1.7. Interviewees pointed to the need for partnership with local authorities and government to help meet worship space needs, especially in places like Walthamstow and Brixton where communities are growing particularly fast.

2.1.8. Some see sharing spaces as 'the obvious way forward' and a multi faith group commented "City churches do share with other faiths. There is increasing diversity and small groups do not have resources of their own" but not everybody suggested this was their preferred option and some opposed it.

2.1.9. There were a number of issues in relation to transport and access. Many have sought to locate near public transport nodes and lines and to maximise the use of transport forms, which are the most environmentally benign and have the lowest impact on neighbours.

2.1.10 Car parking remains a big issue especially problematic for those located in outer London with poor or nonexistent public transport connections and for faith groups with particularly large numbers of worshippers coming from wide spatial catchments.

2.1.11. Almost all the faith communities interviewed thus far provide some level of wider services to their community around their worship space, demonstrating their faith through service to others.

2.1.12. These activities can cover both a physical community and communities of interest. Some larger faith communities offer a very wide range of types of support ranging from spiritual and religious, through social inclusion, cultural, training and education, economic development and capacity building.

2.1.13. Many groups, both large and small, are also involved in increasing literacy about faith issues.

2.1.14. Some communities have cross-subsidised some community services with other activities, making excellent use of their building stock assets in this way.

2.1.15. For newer groups such as Pentecostal churches, lack of adequate space is thought to be limiting their capacity to fulfil their welfare programmes.

2.1.16. Many faith communities such as the Hindu faith community undertake home-based as well as centre-based worship. Home-based worship appears in some cases, for example among some Pentecostal churches, to be a pragmatic response rather than an unconstrained choice. For many, worship at their religious space is a requirement for at least some of their worshippers.

2.1.17. While there is support for shared worship spaces, possibly along a multi-faith model, this will not replace the need for worship spaces for individual faith communities.

2.2. Planning system experiences

2.2.1. Experiences with planning applications vary widely. Some have had very straightforward relationships with planning authorities and spoke of good levels of pre-application advice and support, and no problems in obtaining planning permissions.

2.2.2. A number thought councillors' views were very important in determining whether or not they would succeed in obtaining approvals.

2.2.3. Some interviewees reported either first hand difficulties experienced by their own faith community or examples of problems encountered by others in the planning approval process.

2.2.4. There was a perception that bigger planning applications were more likely to be refused due to greater local opposition to them.

2.2.5. Other issues were about the difficulties inherent in dealing with heritage-listed buildings and the complexities of the planning system at the same time.

2.2.6. Few faith communities feel they have sufficient in-house expertise to deal with planning system and have to hire in expertise if they can afford it.

2.2.7. The system was also felt to be quite unfriendly to users, with difficult planning language and a perception of a lack of 'faith literacy' among planning authorities in some cases.

2.2.8. Planning staff were felt to have been supportive throughout the process in a substantial number of cases, including helping communities monitor and minimise adverse local impacts and developing partnership working arrangements. Others felt there was less support than they would have liked.

2.2.9. All of those interviewed subscribed strongly to the principle of inclusivity - that worship space should be open to all, but not all wanted to share their space with other worship communities.

2.2.10. There are worship space expansion plans or aspirations among almost all the communities interviewed.

2.2.11. For Pentecostal and Charismatic churches these issues appear particularly critical; with costs, scarcity of sites and planning problems all acting as barriers to their aspirations to find large, flexible, well located and affordable sites for their rapidly expanding congregations.

2.3. Worship space growth issues

2.3.1. All of those interviewed reported that their faith community is growing rather than declining but the speed, scale and spatial location of growth varies widely.

2.3.2. For the more rapidly expanding communities in particular the problem of insufficient space and inadequate options for addressing that problem appeared to be substantially worst.

2.4. Potential solutions

Changing the planning system

2.4.1. There was some support given to the idea of changing the planning system use classes so that worship space could more successfully be located in areas now zoned for employment. One interviewee said that, *"My concern is about the classification of employment. Places of worship should be included within the employment use class as it takes a lot of staff to run churches. It is really unfair to consider a church not as an employment space and treating it as space being taken out of employment land. So councils end up fighting to retain empty property that is no use to anyone."*

2.4.2. This change in approach would focus on strategic employment locations where it is considered there are excess land and building holdings that could be released for use as worship space. *"The main thing we need is to look at this in the London Plan. It should be changed to allow faith groups to locate in what's called strategic employment areas provided their property or land has previously been vacant for over 12 months".*

2.4.3. Additionally the idea of developing London wide Supplementary Planning Guidance to better support worship space needs was suggested. *"I suggest that what is needed is an SPG to deal with places of worship. In Southwark for example the borough has a Faith SPG. This document has been used to reverse planning decisions against faith groups".*

Using redundant space

2.4.4. The idea of using redundant space for worship was generally supported and this was a strategy that had been used by a number of communities, especially given issues with planning permissions for new spaces: *"It is difficult to get planning permission for a worship place in London. Redundant churches would work well because their use for worship is already established. So there are less likely to be objections from residents about comings and goings".*

2.4.5. Some had experienced barriers, however, such as insufficient funds to bring their reuse plans to fruition. The idea of turning 'eyesores' in east London to worship spaces as part of the post Olympics legacy appealed to one interviewee.

Increasing support

2.4.6. An initial conclusion made by interviewees is that faith communities need more support in relation to consideration of their worship space needs. This could be related to thinking about their worship space needs when building big new community facilities like conference, sporting and cultural venues.

2.4.7. This could also encompass better 'process' based arrangements like help in negotiating their way through the planning and heritage systems; assistance on identifying and securing external funding sources; partnership working with local authorities in both an urban regeneration and new development context; and formation of independent faith advisory groups at Borough level.

Shared and multi-faith space

2.4.8. An initial conclusion from interviewees is that shared space - possibly long the lines of the multi-faith space model - will be a suitable way forward for some communities but not suitable for everybody as a replacement for their own space.

2.4.9. While larger communities have shown themselves to be willing to share space with smaller emergent groups to a considerable extent, it was felt that a normal part a faith community's growth was its desire to have its own worship space.

2.4.10. The suitability of multi faith spaces was also tied to perceptions about the current size and expectations around expansion of different faith communities in particular areas.

Partnership working

2.4.11. A number of interviewees suggested that partnership working between faith communities and local authorities was likely to be a fruitful area but local authorities need to demonstrate more commitment to this idea in future.

2.4.12. Equally, closer engagement with the GLA was felt to be important to pursue worship space needs and make sure policy and practice fitted together better.

Training in faith literacy

2.4.13. Some interviewees saw the need for faith literacy training by local and central government officials and elected members to increase understanding about both faith and its links to cultural diversity. It was pointed out that one outcome of such training, by increasing awareness and understanding, would be to help refine public policy in this area.

2.4.14. A related area of education was thought to be needed by planners so they could help make the planning system more user-friendly. This should aim to overcome language felt to be alienating and increase the chances of faith communities being able to put in successful planning applications.

2.5. In summary

2.5.1. The views gathered from 13 structured in-depth interviews have been augmented by nearly 200 postal and on-line questionnaires received. All this material is being considered as part of the project analysis work on the project and will be reflected in the final report to the GLA.

3. Findings from planning research

3.1. Introducing the planning research

3.1.1. The other main work stream is research into the way the planning system deals with worship space needs. In this section we briefly summarise the findings thus far from planning research primarily by way of a detailed planning questionnaire sent to all London planning authorities, with follow up interviews in some cases, and augmented by further data collection and analysis from sources such as the London Development Database.

3.2. Developing the questionnaire

3.2.1. The main purpose of the questionnaire survey was to try and establish current patterns of demand by faith communities for places of worship and how such a demand is being met through the planning system in London. As this requires a combination of both qualitative and quantitative data,

questions were developed that sought to determine the nature and extent of planning policy for places of worship and how such policy is being used to determine applications for places of worship through the development control process. 22 of the 33 London Boroughs responded to the questionnaire, providing a 70% response rate.

3.3. Broad findings of the questionnaire

Policy Coverage

3.3.1. Out of the 22 responses, all but three of the boroughs who responded have existing Unitary Development Plan (UDP) policy, and would expect emerging Local Development Framework (LDF) policy, to provide direction on determining applications for places of worship. However, such policies are often generic and broad in scope, covering the wider provision of social and community facilities, which includes places of worship, as opposed to specific policy for determining applications for places of worship. Only the London Boroughs of Haringey and Newham reported that they have adopted and/or have emerging Supplementary Planning Guidance/ Documents (SPG & SPD) relating to places of worship.

3.3.2. There is some evidence that, whilst some UDPs include specific policy on places of worship, policy in emerging LDFs tends to be more general, focusing more broadly on community facilities. This approach is consistent with London Plan Policy 3A.18, which covers a wide range of social and community infrastructure issues.

Perceptions about Adequacy of Provision

3.3.3. Just over a third of the boroughs that responded have reason to believe that existing provision of places of worship within their Borough is inadequate; however, six of the 22 responses said they had reason to believe existing provision is adequate.

3.3.4. Several London Boroughs (Brent, Lewisham, Southwark, Waltham Forest, and Westminster) reported that they are experiencing considerable growth in the population of minority ethnic communities, which is generating a large demand for new and expanded places of worship. This particularly applies to specific faith groups, notably African (Pentecostal) and Muslim faith communities. Two boroughs, Brent and Kingston upon Thames, identified a consistent gain in floor space for places of worship over the past five years as a result of growth in the population of minority ethnic communities within their Borough.

Assessment of Need for New Provision

3.3.5. When asked if UDP policy and/or emerging LDF policy on determining applications for places of worship was informed by a qualitative or quantitative assessment of need, the majority of responses indicated that an assessment of need had not been undertaken before developing policy. The majority of respondents stated that this was due to 'a lack of expectation/requirement to do so'.

3.3.6. Those who stated that they had undertaken an assessment of need had done so through either a qualitative assessment or on a case-by-case basis

when determining planning applications for places of worship. Those that have undertaken a qualitative assessment had done so through consultation with faith groups during the development of their UDP or LDF.

Pre-Application Advice

3.3.7. The majority of respondents stated that they were unable to quantify the number of proposals for places of worship that have been the subject of pre-application discussions since 2000, but where no subsequent application was made. Those who were able to quantify the number of discussions provided estimates between 1 and 5.

Consultation Arrangements

3.3.8. When asked if any of the London Boroughs use any consultation arrangements for applications seeking to develop/extend places of worship that go beyond statutory consultation arrangements, the majority of respondents (13) stated they do not have any additional arrangements. Those who do go beyond statutory requirements for consultation stated that they provide letters informing local residents and businesses of the proposed development.

Objectors' Concerns & Use of Planning Conditions to Address Objectors' Concerns

3.3.9. The principal concerns of consultees with regard to planning applications for places of worship were the impacts of traffic, parking and noise. Out of the 22 responses, 12 Boroughs indicated that they use planning conditions to grant temporary planning permission for use of buildings as a place of worship. The use of such a condition allows the planning authority to assess the impact of use as a place of worship on the local community before granting permanent planning permission.

Use of Planning Conditions to Protect and Prevent Places of Worship

3.3.10. In determining planning applications for a new place of worship, 10 of the 22 respondents stated that they use conditions to prevent the subsequent use of the building for other activities within the D1 Use Class, of which 5 of the 10 respondents 'always' use such conditions. In granting planning permission for a community use (D1) (non-residential institutions), 10 of the 22 respondents stated that they impose conditions that would prevent the use of the building as a place of worship, of which 5 of the 10 respondents 'always' impose such conditions.

Data collection on Planning Applications

3.3.11. A combination of data obtained from questionnaire responses and the London Development Database (LDD) on planning applications for places of worship in London identified 603 planning applications that have been submitted for places of worship since 2000. Of these 603 applications, 436 have been approved, 79 have been refused, 40 were withdrawn and 3 are currently pending. Where the decision of planning applications was not provided by the local authority but a permission status of 'not started' was given, it has been assumed that planning permission has been granted by the LPA.

3.4. Issues and current limitations with the planning data

Additional Data on Gains and Losses in Floor space

3.4.1. Obtaining additional data on existing and proposed D1 floor space will help determine whether the planning system is helping to meet demand (reflected through the number of planning applications for new places of worship and/or proposals for extensions to existing places of worship).

Limitations of Data on Planning Applications

3.4.2. Not all London Boroughs provided details on planning applications for places of worship received since 2000 through the questionnaire, and so the study could only include applications for these boroughs from the London Development Database. As such, planning applications submitted within these boroughs that fall below the LDD threshold have not been included within this study.

Additional Data on Enforcement Notices

3.4.3. Further information on enforcement notices issued by London Planning Authorities in relation to non-conforming use of buildings as places of worship is an important aspect of the overall issue the project is addressing. Obtaining such data on enforcement notices would provide a more robust reflection of the level of demand, the level of understanding amongst faith groups on the need for planning permission, the costs to London Boroughs for taking enforcement action and any impact on permitted land uses in employment and industrial areas.

4. Tentative conclusions to date

4.1. The policy context

4.1.1. From the research material generated from the work streams summarised above we have reached some tentative conclusions that we wish to feed back to stakeholders and seek their views on.

4.1.2. We see the broadest context for the work as sustainable development policy. Local authorities have a duty to promote sustainable development generally and sustainable development is the cornerstone of the planning system. Equally, we note that regard for faith communities is recognised within national policy frameworks. Thus, the Communities and Local Government website says that *'we aim to help bring about a society in which different belief systems, whether religious or otherwise, are understood, respected and valued'* (CLG website). However, despite such broad statements there is no national planning policy, either by way of PPS or circulars that seeks to offer practical guidance towards this outcome. There is only good practice in relation to diversity and planning.

4.1.3. At the London level, the Mayor of London's Supplementary Planning Guidance on Diversity and Planning offers somewhat more specific guidance. It states that: *'In London, models of religious worship are changing and large congregations are developing for some faiths. These groups require large spaces to accommodate all worshippers in their services and in many cases experience difficulties in finding appropriate sites. Where sites can be found, issues of transport accessibility mean that the most suitable locations for these large-scale places of worship are often close to good public transport links. In identifying suitable sites, public transport accessibility should be an important factor (as a central criterion in a 'sequential approach'), although it is recognised that good public transport accessibility may not always be possible due to the limited availability of suitable sites. In any case, the implementation of a green travel plan will minimise the impacts of these facilities on the local area.*

4.1.4. A SPG Implementation Point '4.5c: Supporting places of worship' meanwhile states that: *'Boroughs are advised to identify significant clusters of faith groups and identify sites that will encourage the provision of suitable places of worship and meeting places (separate from or integrated with places of worship). Where appropriate, multi denomination places of worship should be encouraged, which can also serve as wider community facilities, especially as part of regeneration schemes'.*

4.1.5. The survey of London Planning Authorities indicates very limited awareness of the SPG on Diversity and Planning and that it is not followed rigorously. London Boroughs appear unclear how to identify the needs of faith groups, either for forward planning or development control purposes. This seems to be in line with wider research findings into diversity and planning, which revealed that about a quarter of LPAs never consult with faith groups when preparing development plans (Planning and Diversity: Research into Policies and Procedures, March 2004, Sheffield Hallam University, Office of the Deputy Prime Minister).

4.2. Role of faith communities

4.2.1. We note that currently there are around 2200 faith buildings in London and that faith communities have a long tradition of engagement in community service provision and social enterprise. As was reinforced through the engagement interviews and returned questionnaires, religious groups are often at the heart of communities. They have the potential to reach the most marginalized and excluded groups. They offer responsiveness and speed in terms of providing community services and engaging people. In other words, faith groups bring an offer; they don't just place a demand on the planning system.

4.3. Planning and development issues

An historic problem

4.3.1. Finding space for worship is an historic problem. John Wesley, the founder of Methodism, initially preached to vast crowds in the fields that were adjacent to City Road. In the face of severe weather and a lack of support from nearby Churches, in 1740 he leased an adjacent foundry building and converted it to a Chapel with room for 1500 people.

Land values and site scarcity

4.3.2. Today, high land values and site scarcity prohibit the development or extension of places of worship in suitable locations (i.e. close to town centres and transport nodes). Adequate provision of sufficient land and /or buildings with D1 Use Class would limit the problem, but such provision is generally inadequate. As a result, faith communities either have to compete with higher value uses, which is often not possible, or seek alternative options, including land designated for employment purposes, or Green Belt locations.

Historic buildings

4.3.3. The development and growth aspirations of some faith communities (particularly traditional Christian churches) are often inhibited by the historic and architectural importance of the premises they occupy. In some cases this has resulted in Church bodies selling off such premises and using the proceeds to fund lower cost buildings or consolidate the remaining stock of buildings. Where replacement buildings are provided, they are often distant from the communities served by the historic building.

Place of worship of space for worship?

4.3.4. Many newer and expanding faith groups require 'space for worship', rather than a dedicated (or consecrated) place of worship. They differ from the 'inherited' Christian Churches insofar as they are functionally less related to the community in which they are located and serve a wider, sub-regional congregation. In the case of larger communities they also require more flexible and larger spaces for increasing numbers of worshippers that many existing buildings are unsuitable to provide.

Communication and faith literacy

4.3.5. Both the faith community engagement results and the questionnaire survey and planning interviews highlighted the limited amount and quality of communication between faith groups and planners. There may be some lack of understanding on both sides in terms of current and future development needs. The sense that there is a lack of 'faith literacy' by many planning authorities is common among faith communities interviewed.

Planning system issues

4.3.6. Faith communities detailed a range of issues with the planning system including issues around a very understandable lack of planning expertise within the community, and inadequate pre-application advice from some planning authorities.

4.3.7. We were told of many examples where faith communities were refused planning permission for places of worship, or had what they considered unreasonable conditions imposed. We were told of an example where *"the property was empty for 12 years. The church was granted a two-year temporary planning permission. Then a new party came to power and refused to extend the permission. The church has now been asked to vacate the building. This church had put over 90 people into employment and education"*.

4.3.8. Adding to the scarcity of sites, severe difficulties in getting planning permissions means for many faith groups they cannot secure loans to buy property for worship space even where land and buildings do become available.

4.3.9. The high level of planning enforcement activity reflects the problem. On receiving an enforcement notice for illegal use of a building as a place of worship, for example, a faith group in one borough advised that they had misunderstood the validity of the 'Certificate of Registration – Place for Religious Worship' issued by the General Register Office in Stockport as being a planning permission. The council in question disputed that this was possible.

4.3.10. Another London Borough reported that it has experienced a significant and growing problem within the borough with unauthorised places of worship, mainly located in industrial areas. In response the Council has set up a steering group to deal with this issue, which includes planning enforcement, planning policy and senior management of the relevant Council Department.

4.4. Potential solutions

4.4.1. With London's changing population and the increasing demand for new places of worship, it is clearly necessary to develop more specific policies relating to places of worship, rather than relying on the general policies relating to a variety of community uses. As outlined above, there is clearly a need for better information, communication and 'literacy'.

4.4.2. However, meeting development needs of faith communities will be complex; no single solution is available. Two key variables exist: types of places of worship; and the range of appropriate planning policy and other responses. Broadly, and cutting across all faith communities, there appears to be demand for four different types of places of worship, which are mainly related to scale:

1. Home based worship;
2. Local place of worship, serving an established local population;
3. Local place of worship, serving an emerging or new local population (e.g. a regeneration area); and
4. Place of worship serving a wider sub-regional, regional or London wide population as a centre for particular faith community in London (this category could also cover a London multi faith centre).

4.4.3. In reflection of current practice, all these assume that places of worship are likely to be used for non-worship community activities.

4.4.4. The planning mechanisms that could be used to address the need for these different types of places of worship include:

- Appropriate use of the D1 Use Class to lift restrictions on places of worship, provided other planning considerations are addressed (with presumption that planning conditions should not be used to exclude Places of Worship);

- Use of temporary planning permissions in order to allow changes of use to be monitored before granting permanent planning permission;
- Policies relating to designated employment areas to lift restrictions on places of worship, provided other planning considerations are addressed. This would remove the requirement for applicants to demonstrate that employment land is not needed;
- Use of the London Plan Sub Regional Development Frameworks and the master planning of Opportunity Areas to provide land/space for faith communities (including potential use of provision 'standards' and Section 106 Agreements).

4.4.5. A number of material considerations would need to be taken into account with any of these changes including the impact on living and working conditions of neighbouring occupiers; and any impact on the highway network and public transport.

4.5. In conclusion

4.5.1. The summary of findings and tentative conclusions from work completed thus far is intended to act as a guide for discussion with stakeholders at the stakeholder workshop on March 25th. We look forward to presenting the findings to you and discussion their implications in detail.

6. Stakeholder Workshop Proceedings

The consultant team wrote up the stakeholder workshop in detail into a Proceedings document that is found below. The Proceedings data were drawn upon in writing the final report of the project.



Responding to the needs of
faith communities: places of
worship

Proceedings of Stakeholder
Workshop

March 25th 2008 - 2 - 5 pm

Contents

Contents	62
1. Introduction	64
1.1. Background	64
1.2. Purpose of the stakeholder workshop	64
1.3. About the Proceedings	655
2. Proceedings of Plenary Discussion One	655
2.1. About the first plenary discussion	655
2.2. Discussion write-up	655
3. Proceedings of Small Group Discussions	69
3.1. About the small group discussions	69
3.2. Needs of faith communities for worship space in London	69
3.3. Experiences of the planning system	70
3.4. Possible solutions	75
4. Proceedings of Plenary Discussion Two	77
4.1. Feedback from small groups	77
4.2. Plenary discussion	79
4.3. Next steps	79

1. Introduction

1.1. Background

1.1.1. These proceedings document the discussions at a Stakeholder Feedback Workshop held as part of a wider consultation and research programme being undertaken by CAG Consultants, Land Use Consultants and Diverse Ethics. We have been commissioned by the Greater London Authority to conduct research into *Responding to the Needs of Faith Communities: Places of Worship*. We invited around 60 participants to the stakeholder feedback workshop, which was held at City Hall on March 25th 2008 from 2 to 5 pm at City Hall, Queen's Walk, London. Participants represented organisations and individual stakeholders we had previously consulted as part of the research and consultation programme. Prior to the workshop we circulated a detailed briefing note and workshop agenda.

1.2. Purpose of the stakeholder workshop

1.2.1. The purpose of the workshop was two fold:

(1) It provided an opportunity for the consultant team to feed back to stakeholders the findings thus far from the *Responding to the Needs of Faith Communities: Places of Worship* research project and give details about how we are going about doing the research.

(2) The other main purpose was to listen to and discuss stakeholder views in this area and especially focus on solutions participants may have for improving the way that the planning system responds to worship space needs.

1.3. About the Proceedings

1.3.1. The write-up below provides an account of plenary and small group discussion, based on detailed notes made at the workshop sessions by the consultant team. As the research material presented by the consultant team at the workshop was previously sent to participants in the form of a detailed briefing note we have not repeated that material in these Proceedings.

1.3.2. The write up specifically covers:

(1) Plenary discussion session 1 - focusing on feedback from research to date and issues raised by participants.

(2) Small group work discussions of which there were four 'facilitated' groups covering the following issues:

- Needs of faith communities for worship space in London;
- Experiences of the planning system - positive and negative; and
- Possible solutions - statutory, policy, management, land use, other.

(3) Feedback from groups, plenary final discussion and next steps information.

2. Proceedings of Plenary Discussion One

2.1. About the first plenary discussion

2.1.1. The following is a direct as possible write-up of the first plenary discussion following the presentation of research and engagement findings by the consultants. In the write-up: 'P' stands for participant; 'A' stands for answers provided by the consultant team; and 'C' stands for client comment.

2.2. Discussion write-up

- P: Not many boroughs responded to the questionnaire circulated (30% did not respond) – how can the consultants draw proper conclusions?
- A: The 70% response rate is actually quite high in the consultants' experience of working with London Boroughs.
- P: But, it could be that the non-response London Boroughs are the important ones – the London Boroughs where there are particular tensions and problems.
- A: This is true, but it should be pointed out that the consultants are using data from a planning database too, which incorporates data from all London Boroughs. This can in part be used to make up for the shortfall in the questionnaire responses.
- P: Will the maps shown by the consultants' presentation be included in the final report?

- A: Yes – in a supplementary long report to the summary report submitted to the GLA at the end of the consultation process.
- P: I work for an architecture practice that specialises in architecture for Sikh and Hindu communities and I want to know, of the 70% planning approval response recorded in the briefing note/presentation, how many approvals were for change of use of existing buildings and how many for new buildings?
- A: We are unable to provide figures for this at this stage.
- P: Is there data available on the amount of refused applications that went to appeal?
- A: The interrogation of this data is ongoing – there are no figures as of yet.
- P: I represent 300+ churches on planning issues, and the 70% planning approval figure cited by the consultants completely contrasts with the information my organisation has. I think that the information in the briefing note is likely to be confused, and that it is likely that it will be cases about D1 use classes (rather than specifically about places of worship) that will come through strongly.
- P: I want to reiterate that applications for new place of worship facilities is a huge problem. Very few places build new spaces of worship. Where else in London Boroughs is there other than employment areas? However, the onus should be on planners to locate suitable land/premises.
- P: The Neasden temple planning application process is an example of the difficulties involved in finding new sites. There is a question about why councils appeared to be so against identifying land for this temple that has since become iconic. Councils need to show more vision. The Jain temple in Potters Bar also demonstrates this need for more vision from councils.
- P: I am also involved in helping communities with the planning application process and I think the 70% approval figure is exaggerated in this study. I saw a figure of 34% approvals for *all* planning applications submitted to London Planning Authorities, and so I would argue that the 70% figure needs to be reviewed. I am also concerned that an accurate figure of how many people will be impacted by this report is needed. The 2001 census excludes a lot of faith-related groups working outside of official categories and so I want to know how the consultants will accurately estimate the number of people impacted by this work that they are doing?
- P: I want to add to the comments about Neasden. There are in fact traffic problems around the Neasden temple still, perhaps indicating Council's reluctance to approve planning. In addition, there are often traffic, parking and related pollution problems in areas undergoing regeneration that are home to existing faith groups.

- P: I want to know how many faith groups *voluntarily* withdrew their planning applications? Many just give up, I think due to a lack of finesse and expertise in the planning process.
- A: The consultants do not have that data but that they will review what they have collected. The data that can be collected is often not that nuanced though – on applications it is rather just in the form of what is approved, rejected, or pending.
- A: Would anyone from a London Planning Authority like to comment on this issue?
- C: I *suspect* that if an application is heading for a refusal then other things – withdrawal, unauthorised activities... - will come into play. There is a need to contextualise data therefore in order to understand what are the circumstances of applications.
- P: (from a planning authority) Applicants can withdraw rather than have a refusal (this is often so as not to have a planning refusal on their record). I think that Councils *won't* collect data on why applications are withdrawn as such data are not seen to be important – why would they need it?
- P: I agree that often faith groups withdraw applications because they do not want a rejection on their application and because they want to maintain relations with the council. The importance of meeting targets should also be considered (for faith groups and London Planning Authorities).
- P: I want to let the workshop know that my borough is in the process of drafting a Faith SPD and a more general 'communities' policy. In the report, enforcement is looked at from a quantitative angle, but I think that this should be done in a more anecdotal (read qualitative?) way. Councils need to show sensitivity and do not want to over-enforce in this area.
- A: One London Borough in the study has 30 enforcement orders running at present. The scale therefore suggests that 'need' of faith groups must be taken very seriously indeed. It raises questions about which industrial areas might be suited to places of worship, who owns the land etc – and stresses the importance of onus on London Planning Authorities again.
- P: How did the consultants chose which faith groups to consult? [I.e. what was their sampling methodology?].
- A: Consultants tried (in consultation with the GLA) to come up with a representative sample. Muslim and Pentecostal (emergent) groups came through particularly strongly, and a spread across diverse faith groups and inter-faith communities was sought as well. The study *had* to be representative. We tried to sample and generate a feel for the experiences of groups. An emphasis emerged on Muslim and Pentecostal groups because they had expressed difficulties.

- A: The methodology also involved taking a geographical sample (inner, outer...rings of London; regions – north, south, east and west London) too. The final report will document in more detail how choices were made.
- P: In my experience of withdrawals, officers (esp. in [borough name]) call and *request* planning applications to be withdrawn quickly. At London Planning Authorities staff turnover is often very high and so it is difficult, staff-wise, for London Planning Authorities to finish applications. Faith group-officer contacts/links etc are lost. In relation to [borough name], I want to see the Faith SPD. It is one of the worst London Boroughs in terms of the treatment of churches and churchgoers by faith groups – taking away instruments during congregations etc. I want to see the SPD.
- A: One of the key findings of the report was the huge resourcefulness of faith communities, groups that are mostly run by volunteers. The GLA should see this as a *strength* of London.
- A: More plan-led policy is needed, it's key to look at that. On the withdrawals issue, we can go away and surmise this using data on a number of withdrawals and see what the issues are.
- P: I urge the Workshop that whatever recommendations go forward participants must support it all the way. It is an opportunity to have change once and for all. Reports are so often disconnected from events on the ground and I encourage those involved in this to strengthen this one, which has a more engaged approach.
- P: A vast amount of money goes into design and planning. Officers must acknowledge the costs for faith groups. My group spent £150k on an application and design that we had to withdraw, for example.
- A: We learnt that communities often can't get money together for planning applications and so proposals fall through at that point.
- P: The discussion, and briefing note, focus a lot on policy and policy work, but that policy – e.g. the Race Relations Act – often fails. Is it that sensitivity and understanding from London Boroughs is not there? *Or*, is it that competition for space is high and the approval of other uses is often prioritised? With this in mind I want to emphasise the need for a body to monitor changes and application process to be established (as much as an emphasis on formulating policy).
- A: We have had a variety of responses from London Boroughs, then, and the monitoring body suggestion has been acknowledged by the consultants today.

3. Proceedings of Small Group Discussions

3.1. About the small group discussions

3.1.1. For the next part of the workshop, the participants broke into four smaller groups for a facilitated discussion in each group. This is written up below under the three headings in which small group discussion occurred:

- Needs of faith communities for worship space in London;
- Experiences of the planning system - positive and negative; and
- Possible solutions - statutory, policy, management, land use, other.

3.1.2. As each of the four groups discussed the same areas, a number of the same issues and solutions emerged, so that there is a certain amount of repetition among points made.

3.2. Needs of faith communities for worship space in London

3.2.1. The groups first discussed the needs of faith communities for places of worship and some issues this raises.

- Difficulty in valuing Grade I and II listed buildings is resulting in independent churches often avoiding such buildings when seeking a new facility, as there are problems with renting/leasing these buildings (often C of E churches).
- There is a difficulty in determining a realistic property value for a place of worship and marketing the building as a place of worship.
- There is an overarching issue of a constantly changing demographic of London population and the continually changing nature of faith groups. This makes it very difficult to assess needs at any one time and to predict needs in the future.
- There are differences between gathered and local congregations. Some communities are centred around their place of worship whereas others come from a variety of places to a sub-regional/regional place of worship where there may not be a local community for that particular place of worship.
- There are issues of consultation with local communities before planning applications go in because as soon as they start mentioning their proposal the response will be very negative.
- We recognise the saturation of space. Land is at a premium. DfE regulations discourage the use of schools for other reasons. This is a second-generation issue.
- Using schools - I wouldn't put in this plan - people want to move away from these spaces in order to develop.
- 'Building Schools for the Future' - to use for other facilities (except religious uses).

- In terms of Hindu/Sikh communities when we talk about places of worship, that is, formal worship space, it's really more of a meeting area. Worship is really only about 15 minutes of that therefore we have everything from sports halls, legal services, childcare services etc. So it's much wider than D1 use.
- This fits central government policies for the 3rd sector. I.e. Neasden Temple is very successful in delivering government's programmes as a provider. This is similar to how schools used to be.
- Irrespective of which faith group it is, that is how it will move. It is true of most faith communities. Faith buildings are nearly always multi-use centres.
- Needs are diverse so there is not just one or even a dozen templates that will fit everyone.
- There will be many ways buildings are used. All sorts of criteria come into play: location, the size of the building, the faith tradition etc.
- We believe the whole of the use of our space should be used for collective worship. In our church everyone takes part. For that reason we don't have churches in the centre of London but in places where there are more families. We have places of worship (1) like doctors' surgeries and (2) borough wide, large rooms in which we congregate. These large rooms have to cover three boroughs.
- Could faith groups share spaces? The issue of shared space - all faiths want to preserve their space for particular reasons. Certain faith centres rent out space to other communities for various purposes if they have capacity.
- For some communities sharing space is possible, for others there are theological reasons why it is not.
- A lot of churches have their own functions day-to-day so to think they can share isn't practical.
- Hiring out space occasionally isn't the same as sharing day to day.

3.3. Experiences of the planning system

3.3.1. The groups next discussed experiences of the planning system.

- Planners need to have a greater understanding of the role and importance of faith communities and places of worship and interact with all faith groups better.
- The planning system does not seem to recognise the contribution of places of worship to the wider community, in terms of providing employment and offering a range of cultural and leisure activities.
- Exclusion by condition of these wider activities can make it difficult for places of worship to survive.

- Boroughs sometimes expect faith communities to contribute to local infrastructure improvements. This can be onerous for faith communities.
- Land values are high in town centre locations and this problem is being exacerbated by planning policy that places emphasis on increasing housing density – sometimes at the expense of D1 Uses. As a result, faith communities are forced to seek places of worship further away (example of places of worship going to outlying industrial areas).
- There is a concern about how far planning consultation by Boroughs is reaching. There is a need for a stronger network of faith community consultees to ensure their views are represented.
- When considering employment policies and the need for land for employment uses, Boroughs tend not to take account of places of worship – which can contribute significantly to employment.
- London Planning Authorities are underestimating the size of space needed by faith communities.
- Often a perception that marketing a property as 'residential' has the highest value when marketing a church that has become redundant. However, when marketed as a place of worship, high values can be achieved.
- Example in [borough name] where a Listed Building (a former Bingo Hall) was purchased by a faith group. There was considerable opposition to the use of the building as a place of worship, because of a perception that its historic interest will be compromised.
- Could the heritage value of listed buildings be compromised to allow for the growth of places of worship? There is a perception that faith groups who purchase listed buildings would not consider the heritage value when adjusting buildings to suit their needs.
- There is general problem of keeping buildings in community use. Places of worship can offer a viable means of achieving this.
- Other material considerations reflect the needs of faith communities beyond an identified need for a place of worship when determining applications.
- Lack of information – what the needs are for planners? How can planners analyse the needs of faith communities, or access information on this?
- The increasing demand for worship space is a problem for planners.
- There is a case in [borough name] that had particular problems with enforcement and that the GLA are aware of.
- There is a lot of pressure on employment sites for the allocation of places of worship.
- Sites that have been allocated for employment use have pressure on them for change of use increasingly.

- The lack of availability of premises in particular areas of the borough is a problem.
- Applications often come in from smaller Muslim and Pentecostal groups for house conversions in residential areas and these are rejected due to the unsuitability of these areas to these sort of uses.
- There is increased demand for converted space in houses. Such applications must pose traffic, parking problems etc.
- There is an example in [borough name] of the unauthorised extension of a row of shop backs to provide a space of worship, but that this can be intimidating (for local residents passing by and planning officers trying to regulate it alike).
- Multi-/dual-faith uses of sites are a way forward perhaps, but how does this impact upon the faith groups concerned?
- Some more established faith groups with excess land are often reluctant for other faith groups to use their space – they would rather sell it for other purposes when the London Borough enquires about the possibility of other faith groups using it.
- *How do we assess needs?* This is a *key* recurring theme for planners – we do not know how to best establish the needs of constituents, and this is especially difficult where communities are very diverse.
- Another concern for planners is how they should treat groups equally – clearly the planners are concerned not to be seen to discriminate.
- In terms of assessing needs in this way, groups in unauthorised facilities would be likely to be reluctant/scared to participate – we need to know how to engage with these hard-to-reach groups, especially as planning officials.
- New faith groups can be quite insular and so hard to consult. They do not want to talk to officials, council representatives etc.
- This it is not a high priority for London Boroughs to contact all faith groups.
- Other issues – education and health – are easier to get a handle on/to address because there are established representatives to consult. Faith is so diverse, on the other hand, and disconnected from planning, that it's a difficult area to consult on.
- London Boroughs can be more open to diverse groups, and use less jargon. However, in a previous exercise to reach hard-to-reach faith groups that I was involved in [borough name] an extensive publicity drive for a consultation event (including the translation of planning documents into several languages, the dissemination of these materials to multiple groups, and publicity in diverse media (press and radio) failed when no-one turned up for the event except borough planners and the 7 translators they had invited. I.e. can't expect too much from consultation.

- My borough is doing its Statement of Community Involvement. One thing we find is resistance from planning officers to the use of 'places of worship' rather than 'community use'. As soon as the 'places of worship' phrase comes you know there will be significant local opposition.
- I don't agree. Where people are telling you 'community use' they don't want places of worship.
- Is that just about particular locations?
- No. Planning authorities tend to assume the worst-case scenario with any place of worship.
- Traffic etc is a real issue where there are complex applications - both plan teams and faith communities need to think about this.
- The faith community use can easily be understood as mixed use as it conforms with the B Use Class. Buildings are used for many alternative things.
- We have won arguments in planning appeals to say faith space is employment space but we had to go to appeal to prove it.
- All faiths have an element of philanthropy, altruism - a one-stop community centre. An example is the Muslim Cultural Centre in the Royal Borough of Kensington and Chelsea. This was a showpiece centre - a planning officer was seconded to work on that.
- Council officers and elected officials need to take [faith needs] on board at planning committee and the whole council decision stage.
- At the voting stage it is often uncertain. Elected officials tend to think about political issues.
- Planning committees may not have enough information from planning officers. They are not briefed properly.
- On needs, some faith traditions will have exceptional needs on certain days. It's these few days that create resistance to applications.
- From a planning official point of view it's a planning application that has to be decided on the same basis as any other application. Our perspective is less about briefing.
- When it comes to finding appropriate locations for worship space its more difficult than a single house say, as there may be major considerations like sustainability to take into account. There may be London Plan policy and national policy to consider. For example we have defined employment areas. The Mayor's just made changes to make it more industrial use - so it's now a very narrow category. Planners grapple with all these issues.
- The issue is the best way to deal with worship space needs within the existing planning framework.

- Defined employment areas now need to take into account travel issues relating to climate change.
- I feel that employment use is under attack from government and developers for land uses that don't consider employment.
- Councils are trying to meet all sorts of different needs: housing, jobs, SD.
- We've raised these issues in London Boroughs. We have spoken to different planning officers. In one case we asked for 12 months, got three years whereby if a space is empty it can be taken over for other uses.
- Councils have released other employment areas too. That's good. But when releasing land can we put at least 20% of space for faith communities?
- Faith centres are very diverse. They do various things. From a development control point of view all of those boxes have to be ticked. If a planning application fails on one issue it gets refused.
- Material considerations are quite an important thing in a place of worship application. The ethos of the faith group is different for each faith.
- Faith literacy for local officials is a very big necessity. It's possible literacy is one of the answers. There's confused understanding and a need to acknowledge the specificity of each space-sharing situation.
- For areas like the Thames Gateway where there is going to be significant development how should planners approach the issue?
- The application for Kingsway has just been refused. They had spent £1.8 million. It was refused on the basis that the site was employment land. We're looking at ways we can address this.
- The turnover of planning officers can make it more difficult.
- In residential development cases if you appeal you challenge the policy. You must take into account previous appeal decisions. It's material consideration.
- On places of worship it's quite different. We have challenged decisions and won but local authorities then say they have to give to GLA [?]. Example: there was greenbelt policy for crematoriums and cemeteries. These were seen as appropriate land uses. Then someone from London government gave [?] policy to remove crematoriums from greenbelt use while cemeteries were allowed to remain.
- Developers have lots of money so they can fight but faith groups don't.
- Planners tend to see faith communities as similar to developers.
- There may be a need for [planning] advice from an independent source for faith communities.

3.4. Possible solutions

3.4.1. Participants next turned to possible solutions to some of these needs and issues.

- Developing a tariff for community infrastructure in new developments (example of Milton Keynes). This relies on the establishment of an effective forum for deciding how to allocate the funding or land made available.
- Barking and Dagenham is an example where money for places of worship is not coming from Section 106 agreements but sites are being provided.
- Central Government needs to get more involved in this issue as this is a significant problem at the national scale, not just London.
- New Government legislation where landowners are now required to pay tax on buildings, whether they are occupied or not. This is providing an incentive to market vacant property and is bringing land forward quicker.
- Policy on releasing employment land could make explicit that it is in part seeking to meet the needs of faith communities.
- Land in council ownership should be acknowledged as a source of land for community needs, not just for the Council's needs.
- Greater use of signposting and networking between faith groups, planners, landowners and developers.
- When making sites available for places of worship in employment areas, these should be on the fringe of industrial areas that are in close proximity to public transport and main roads. In such cases, consideration also needs to be given towards the design of these buildings, as places of worship can provide a positive contribution towards the surrounding townscape.
- One-off consultations often fail – you need ongoing events.
- There is the possibility of going the other way – planners attending forums organised by, rather than for, hard-to-reach groups.
- Places of worship form part of the 'service sector' and could be accommodated in former industrial buildings – some of which are currently superfluous to industrial needs.
- Major development areas provide a considerable opportunity to provide places of worship. For example, the Section 106 Agreement relating to the Kings Cross redevelopment includes the provision of a multi-faith centre.
- Camden has a faith officer and a faith partnership.
- A more plan led, policy approach that would remove uncertainties. The planning application is at the end of the process for new development. This [kind of approach] tends to be done more for housing use; maybe it needs to be on a London wide basis.

- Planning officers need to be relaxed in their approach to place of worship applications.
- Core strategy priorities provide the opportunity at borough level to look at all these issues.
- Perhaps a master planning approach.
- Faith groups should do more pre-application engagement with residents i.e. set up green travel plans.
- We need to learn from best practice - such as in Brent where there have been successful applications, there has been outreach from the council to communities.
- The Mayor could require 10-20% of space for faith uses (Section 106 or other technique) in new developments of a certain scale. Developers understand their developments will have an impact on services. They could ring-fence resources for places of worship.
- Where a faith group doesn't have a strong expertise network, who should be responsible? Where this is just a bunch of volunteers they could get pro bono advice.
- We do consultation with local communities before planning applications by producing a brochure. We invite local people to our halls and pre-empt residents associations.
- Planning Aid? They have just been awarded £50 million.
- The greenbelt 'scrappy bits' should have community uses allowed. This was deleted from PPG2 in 1995.
- I have written a government circular on faith groups.
- You must have strong policy or planning officers will work on their own preferences and prejudices.
- Faith literacy and planning literacy - cooperation on both sides is important to move forward.
- People need to come from within faith communities to understand needs. They could appoint people to educate others.
- We in faith communities can take on board when you come to develop a new facility it's a maybe once in a lifetime experience. So it's about education, and language people can understand.
- The Planning Pack from Planning Aid for London is good.
- Those faith groups willing to share can be encouraged to share. The more sharing possible the better.

- Could there be more sharing of existing facilities like schools?
- Faith groups need to register with opponents - nimbys - to justify that they have done as much as possible to address concerns.
- The way forward is to get objectors on side, may be the only way is to share facilities.
- Long consultations are needed so that contacts, trust and information can build over time.
- Raising the agenda of places of worship higher is needed to match employment and housing.
- The Mayor's office needs to look at how infrastructure/amenity can be improved in terms of transport etc so more suitable locations can be established for faith spaces.

4. Proceedings of Plenary Discussion Two

4.1. Feedback from small groups

4.1.1. The final part of the workshop allowed time for feedback in summary from each group. The group numbering does not indicate any priority, just allows different groups to be distinguished.

Group 1 feedback

- The group reported that it was comprised largely of planners, and so the discussion centred on the issues faced by them.
- In terms of needs, there was a strong sense that demand for sites was increasing, and that there is a very significant lack of information for LPA officers outlining what the needs of the various faith communities are. The importance of establishing *what the needs are* and making this available to planners is therefore key.
- Experiences of the planning system tend to be negative. Applicants lack the skills to negotiate planning applications. At the same time, jargon is often excessive from the planners' side. There is also a need to establish what modes of consultation work and how to engage hard to reach group – experience of low participation suggests the importance of long/regular consultations rather than one off events.
- In terms of solutions, the emphasis was on raising awareness as to the mechanisms already available to assist applicants of any kind with planning applications. A potential database of available/existing community premises was also posited.

Group 2 feedback

- The group emphasised in particular a proposal that a minimum amount, at least 20%, of land in employment areas is released for use by faith communities.
- It was stated that the organisation Planning Aid should be used more readily by (and promoted to) faith groups.
- In addition, it was suggested that when an application has been submitted by faith communities it is important that they conduct their own consultation – e.g. to address objectors' concerns – and that they should be made aware that such actions will improve the chances of their applications being successful.

Group 3 feedback

- The group first noted all the difficulty identified by the group in re-using old Churches that are Grade I or II heritage sites.
- The group pointed out that in some cases, and against common understandings, sites sell for more money when sold on as community sites, rather than being converted to other (esp. residential) uses, and that this should be borne in mind.
- Group 3 also discussed a sense that strategic 'Sustainable Development' policy – promoting high density development in central locations – puts pressure on land uses, pushing places of worship out from their existing sites.
- Greater networking between faith groups was also identified as needed.
- In terms of solutions, the provision of land (if not money) through Section 106 agreements, as well as policy intervention by central government, was posited.

Group 4 feedback

- Group 4 found that the role of the Local Authorities and GLA in auditing what the needs of faith groups are needs to be clarified, and more work needs to be done to audit these needs.
- It was pointed out that Camden has a faith officer, and a multi-faith Section 106 agreement ongoing (though this may end up being a single faith centre) – this London Borough could be used as best practice.
- It was also suggested that the ways that planners interact with all faith groups needs to be improved. There is a sense that there is very little information available to planners.
- A need to audit the 'offer' of places of worship was also identified, and ways to calculate the benefits that such places of worship provide to the local community more broadly.

- The question of transport was also raised. Should there be an emphasis on sites proposed that have good existing transport links? If so, provision between boroughs will vary (e.g. LB Bexley not well served by public transport).
- In terms of the release of employment allocated land it was also noted that this conflicts with the need to provide work places and more jobs. This must be acknowledged. There is a pressure on London Planning Authorities to provide work premises too, and so there is a wariness about reversing employment class land allocations.

4.2. Plenary discussion

4.2.1. There was next a short time given for any 'burning issues' that had not already been covered to be mentioned, or any points from the feedback to be taken up by participants.

- The empty property rates issue was mentioned whereby increasing rates for leaving property empty may help free up sites for places of worship.
- A participant reiterated the proposal that excess land in employment areas (at least 20%) be allocated for worship use.
- The views of the 'no faith' sector also need to be taken on board. There are people who don't want any places of worship designations and the faith sector needs to recognise this.

4.3. Next steps

4.3.1. Finally, CAG explained the next steps in terms of writing Proceedings and the final report. It said it would expect to complete the Proceedings by next week and hoped to be able to disseminate them as soon as possible after that, once they have been submitted to the GLA.

- In relation to overall project reporting, a 'short, sharp and shiny' report with findings, conclusions and recommendations will be submitted to the GLA, along with a bigger supporting report to accompany it, which will document the evidence base from all areas of the project and explain in detail the methods used.
- The consultants then invited the client (GLA) to explain next steps in relation to making use of research and consultation findings and recommendations.
- The client explained that the final report will be from the consultants to the Mayor, and will be published in May.
- The process will be that the GLA officers will assess the report and feed it back to the Mayor. In practical terms, the GLA will look at how the London Plan could address the issues discussed at this workshop. It is likely that the Consultants will make a recommendation for a specific policy for places of worship to be developed. Should this be the case, it

is important to have a robust evidence base in support of any such recommendation, and this workshop is identified as part of that evidence base.

- The client stressed that it is a slow process, and wanted participants to be aware of this from the off so as not to get hopes up for swift changes. He explained that should the London Plan be the mechanism for policy changes, this would take a period of several years to finalise.
- It was noted that the Consultants are likely to suggest that a new Places of Worship policy in the London Plan should be accompanied by a Supplementary Planning Guidance document to provide guidance for both London Planning Authorities and applicants.

4.3.2. The workshop closed at 5pm.

7. Engagement Interview List

7.1. 13 in-depth interviews were completed from a larger number of 22 invited to be interviewed across a spread of faith communities in London. This data set was augmented by 20 postal questionnaire returns and 140 online questionnaire returns.

NAME OF ORGANISATION	FAITH	OUTCOME
Swaminarayan Hindu Mandir	Hinduism	Completed
Brahmakumaris	Multi-faith	Completed
Zoroastrians	Zoroastrian	Completed
Oshwal Centre	Jainism	Completed
Board of Deputies of British Jews	Judaism	Contacted
Church of England	Christianity	Completed
Evangelical Alliance	Christianity	Completed
Muslim Council of Britain	Islam	Contacted
SGSS Gurudwara	Sikhism	Contacted
Regent's Park Mosque	Islam	Contacted
Ismailia Centre	Islam	Contacted
Bahai UK	Bahai	Completed
St. Ethelburgas	Inter-faith	Completed
Hare Krishna	Hinduism	Completed
African Caribbean Evangelical Alliance	Christianity	Contacted
Rajyoga	Hinduism	Completed
The Buddhist Society	Buddhism	Completed
East London Mosque	Islam	Completed
Pentecostal Church*	Christianity	Contacted
Pentecostal/Evangelical representative	Christianity	Completed
Charismatic Church*	Christianity	Contacted
Charismatic Church*	Christianity	Contacted

* We have withheld the name of the Church to avoid identifying the proposed interviewee

8. Stakeholder Interview and Questionnaire Pro Forma

The following pro forma was developed for use in the in-depth interviews and adapted for use as a postal and online questionnaire form.



Responding to the Needs of Faith Communities: places of worship

For the Greater London Authority

Faith Communities Structured Interview Pro Forma

Final

Name:

Contact Details: Email Tel.....

Name of Organisation:

Religion/Belief:

Location - Address of Faith HQ:

Borough Council for Location:

1. Exploring specific development needs:

1.1. What do think are your spatial needs in terms of places of worship over the next fifteen years? (e.g. this could include large congregation space; community facilities; facilities for disabled people; outdoor space; public transport provision to allow worshippers from further afield; dedicated car parking)

1.2. Are there times when use is greatest? Is it mainly on certain days? (e.g. Sundays or Festival Days) Does this mean needs for special arrangements (e.g. security; car parking; crowd management)?

1.3. How do you cope with increases in demand?

1.4. Do you see ways that your place of worship is, or could be, used to provide services to the wider community? (e.g. meeting space, school/educational visits) Can you see any constraints on such use?

1.5. Are needs purely faith/worship based or do they also have a social and community orientation? (e.g. Is there a tradition of home shrines and home-based worship that might help meet needs)

2. Planning system experiences

2.1. What is your experience of planning applications? (e.g. this could include successful applications/barriers encountered, any recent planning applications made for new or expanded places of worship)

2.2. Do you have expertise in the planning area, or was there any support given during the planning process?

2.3. How has the borough supported site development and use after opening of your place of worship? What is the perception of the planning process?

2.4. Do you think there may be sensitivity about sharing of resources especially when worshippers may be living in different boroughs but using place of worship services of one borough?

2.5. Do you have any plans to extend your place of worship facilities, or expand into new locations in London?

3. Growth and decline issues

3.1. Do you think your congregation is growing or declining? What do you think are the implications for your place of worship needs?

3.2. If your congregation is large and fast growing, do you already, or are you likely to, exceed current provision for places of worship?

4. Possible solutions

4.1. Do you have suggestions for meeting future needs? (e.g. This could include reuse of redundant churches; shared use of buildings; new multi-faith centres; or other options)

9. Planning Questionnaire Pro Forma



Responding to the needs of faith communities: places of worship A study for the GLA

Questionnaire for London Boroughs

Purpose of the study

CAG Consultants, in association with Land Use Consultants and Diverse Ethics, have been commissioned by the Greater London Authority to establish the current demand by faith communities for places of worship in London, analyse the policy approach taken to determining applications for places of worship at the local authority level in London and explore faith communities' experience of the planning system. The outcome of this project will identify current patterns of supply and demand alongside the experiences of faith communities using the planning system and planning practitioners in responding to such needs. This information will then be used to inform potential policy changes to the London Plan.

Role of this questionnaire

The purpose of the questionnaire is to obtain information from all London Boroughs on how the planning system manages development and changes of use involving places of worship. This involves identifying existing policies relating to places of worship in each London Borough. In addition it involves determining the number, scale and type of planning applications for places of worship and the key issues raised by these applications. Providing this information will help in defining the extent to which London-wide policy on places of worship has been incorporated into borough planning policy, and to what extent the planning system is currently meeting the need for places of worship in London.

Please note that the final report will not refer to specific responses to the questionnaire; rather it will draw on the overall findings, both quantitatively and qualitatively.

Background to questionnaire

London is home to a wide variety of faith communities. The 2001 Census found that nearly 60% of Londoners say they are Christian, 8.5% are Muslim, 4.1% Hindu, 2% Jewish and 1% Sikh. With population growth and increasing diversity, appropriate provision for places of worship and associated facilities for the growing congregations of some faith groups in London is a key challenge.

Some faith groups have reported significant difficulty in finding appropriate sites and buildings for worship and associated activities. Places of worship fall within

the 'non residential institutions' (D1) Use Class within the planning system, which also includes a range of community uses. Current planning policy does not promote the use of a specific methodology for assessing the development needs of faith communities. As a result, some places of worship have become established on inappropriate sites and in unsuitable buildings, such as industrial buildings in areas identified for employment uses. This reflects the difficulty of obtaining planning permission for new sites in appropriate areas and for the expansion of existing sites.

Please respond to this questionnaire by Monday 14th January, 2008. Email responses should be sent to Ben Peirson at ben.peirson@landuse.co.uk.

Postal responses should be sent to:

Ben Peirson
Land Use Consultants
43 Chalton Street
London NW1 1JD

Thank you for your assistance. Data gathering from London boroughs is an essential component of this project and your co-operation is very much valued.

Questionnaire survey questions

A. Forward Planning

1) Does your borough have UDP policy and/or emerging Local Development Framework policy on determining applications for places of worship? (Yes/No)

a) If yes, please provide policy reference and web link (if available) for:

i) Adopted policy

.....
.....
.....

ii) Emerging (unadopted) policy

.....
.....
.....

2) Does your borough have adopted and/or emerging Supplementary Planning Guidance (SPG)/Supplementary Planning Documents (SPD) relating to places of worship? (Yes/No)

a) If yes, are these documents attached?

.....

3) Do you have reason to believe existing provision of places of worship in your borough is inadequate? (Yes/No/Don't Know)

a) If yes, please explain

.....
.....
.....
.....

b) If no, please explain

.....
.....
.....
.....

4) If your borough has UDP policy and/or emerging Local Development Framework policy on determining applications for places of worship, was this informed by a quantitative or qualitative assessment of need? (Yes/No)

a) If yes, can you briefly explain the methodology used for assessing need, including any consultation undertaken?

.....
.....
.....
.....

b) If no, was this because of:

- i) Lack of expectation/requirement to do so
- ii) Lack of accepted method
- iii) Lack of resources

iv) Don't know

B. Managing Development

5) Can you quantify the number of proposals for places of worship that have been the subject of pre-application discussions since 2000, but no subsequent application was made? (Yes/No/Don't Know)

a) If yes, how many?
.....

6) Do your borough's consultation arrangements for applications for developing/extending places of worship go beyond statutory consultation requirements? (Yes/No)

a) If yes, what are these consultation arrangements?
.....
.....
.....

7) What are the principal concerns of consultees with regard to planning applications for places of worship?

- a) Traffic
- b) Parking
- c) Noise
- d) Other (please specify)
.....
.....
.....

8) In determining applications for places of worship, what issues are generally addressed by conditions:

- a) Access
- b) Parking
- c) External Lighting
- d) Noise limitation
- e) Hours of operation
- f) Use of the building for other activities (e.g. wider community use, leisure etc.)
- g) Period of permission
- h) Other (Please Identify)
.....
.....
.....

9) Please use the attached spreadsheet to provide data on planning applications for places of worship (including new development, extensions and change of use to/from places of worship) in your borough since 2000. (Attached/Not attached)

a) Please provide the following information:

- i) Type of application (e.g. change of use, new development, redevelopment or demolition)
- ii) Brief description of proposal, including type of place of worship
- iii) Decision (including reasons for refusal, where appropriate)
- iv) Date of decision
- v) Permission status (started, not started, completed, don't know)
- vi) Proposed increase/decrease in floor space of place of worship
- vii) Listed Building status

10) In determining planning applications for a new place of worship, does your borough impose a condition that prevents the subsequent use of the building for other activities within the D1 Use Class? (Yes/No)

a) If yes, how often are such conditions imposed?

- Always
- Sometimes
- Never

11) In granting planning permission for a community use (D1) (non-residential institutions), does your borough impose a condition that would prevent the use of the building as a place of worship? (Yes/No)

a) If yes, how often are such conditions imposed?

- Always
- Sometimes
- Never

12) Does your borough use Section 106 Agreements to address planning objections for places of worship or reinforce planning conditions? (Yes/No)

a) If yes, how often are such agreements imposed?

- Always
- Sometimes
- Never

b) If yes, please provide examples of where a Section 106 Agreement has been used to address planning objections or reinforce planning conditions. (Attached/Not attached)

.....

.....

.....

.....

.....

10. Late response to planning questionnaire



Responding to the needs of faith communities: places of worship A study for the GLA

Questionnaire for London Boroughs

Purpose of the study

CAG Consultants, in association with Land Use Consultants and Diverse Ethics, have been commissioned by the Greater London Authority to establish the current demand by faith communities for places of worship in London, analyse the policy approach taken to determining applications for places of worship at the local authority level in London and explore faith communities' experience of the planning system. The outcome of this project will identify current patterns of supply and demand alongside the experiences of faith communities using the planning system and planning practitioners in responding to such needs. This information will then be used to inform potential policy changes to the London Plan.

Role of this questionnaire

The purpose of the questionnaire is to obtain information from all London Boroughs on how the planning system manages development and changes of use involving places of worship. This involves identifying existing policies relating to places of worship in each London Borough. In addition it involves determining the number, scale and type of planning applications for places of worship and the key issues raised by these applications. Providing this information will help in defining the extent to which London-wide policy on places of worship has been incorporated into borough planning policy, and to what extent the planning system is currently meeting the need for places of worship in London.

Please note that the final report will not refer to specific responses to the questionnaire; rather it will draw on the overall findings, both quantitatively and qualitatively.

Background to questionnaire

London is home to a wide variety of faith communities. The 2001 Census found that nearly 60% of Londoners say they are Christian, 8.5% are Muslim, 4.1% Hindu, 2% Jewish and 1% Sikh. With population growth and increasing diversity, appropriate provision for places of worship and associated facilities for the growing congregations of some faith groups in London is a key challenge.

Some faith groups have reported significant difficulty in finding appropriate sites and buildings for worship and associated activities. Places of worship fall within the 'non residential institutions' (D1) Use Class within the planning system, which also includes a range of community uses. Current planning policy does not promote the use of a specific methodology for assessing the development needs of faith communities. As a result, some places of worship have become established on inappropriate sites and in unsuitable buildings, such as industrial buildings in areas identified for employment uses. This reflects the difficulty of obtaining planning permission for new sites in appropriate areas and for the expansion of existing sites.

Please respond to this questionnaire by Monday 14th January, 2008. Email responses should be sent to Ben Peirson at ben.peirson@landuse.co.uk.

Postal responses should be sent to:
Ben Peirson
Land Use Consultants
43 Chalton Street
London NW1 1JD

Thank you for your assistance. Data gathering from London boroughs is an essential component of this project and your co-operation is very much valued.

Questionnaire survey questions

A. Forward Planning

13) Does your borough have UDP policy and/or emerging Local Development Framework policy on determining applications for places of worship? (Yes/No)

No (religious meeting places are covered by general policies on community facilities)

a) If yes, please provide policy reference and web link (if available) for:

i) Adopted policy

.....
.....
.....

ii) Emerging (unadopted) policy

.....
.....
.....

14) Does your borough have adopted and/or emerging Supplementary Planning Guidance (SPG)/Supplementary Planning Documents (SPD) relating to places of worship? (Yes/No)

A Planning Advice Note on Religious Meeting Places which will be upgraded to SPD status once the main LDF documents are complete

a) If yes, are these documents attached?

Yes.....

15) Do you have reason to believe existing provision of places of worship in your borough is inadequate? (Yes/No/Don't Know)

a) If yes, please explain

There does appear to be a clear demand, based on claims made by various groups and on increased occurrences of pre-application enquiries, planning applications and enforcement cases.

b) If no, please explain

.....
.....
.....
.....

16) If your borough has UDP policy and/or emerging Local Development Framework policy on determining applications for places of worship, was this informed by a quantitative or qualitative assessment of need? (Yes/No)

a) If yes, can you briefly explain the methodology used for assessing need, including any consultation undertaken?

A full qualitative and quantitative assessment of need has not yet been undertaken on a borough-wide/strategic basis, though this has been done at the more local level in relation to particular schemes such as Barking Riverside. A full assessment will need to be done before our PAN can be upgraded to an SPD, or possibly as part of



the emerging SPD on community benefits (which will move towards a 'Community Infrastructure Levy' type arrangement for developer contributions in Barking and Dagenham)

- b) If no, was this because of:
 - i) Lack of expectation/requirement to do so
 - ii) Lack of accepted method
 - iii) Lack of resources
 - iv) Don't know

B. Managing Development

17) Can you quantify the number of proposals for places of worship that have been the subject of pre-application discussions since 2000, but no subsequent application was made? (Yes/No/Don't Know)

- a) If yes, how many?
1 formal and approximately 5 informal.

18) Do your borough's consultation arrangements for applications for developing/extending places of worship go beyond statutory consultation requirements? (Yes/No)

- a) If yes, what are these consultation arrangements?

.....
.....
.....
.....

19) What are the principal concerns of consultees with regard to planning applications for places of worship?

- a) Traffic
- b) Parking
- c) Noise
- d) Other (please specify)
Loss of industrial units and user safety

20) In determining applications for places of worship, what issues are generally addressed by conditions:

- a) Access
- b) Parking
- c) External Lighting
- d) Noise limitation
- e) Hours of operation
- f) Use of the building for other activities (e.g. wider community use, leisure etc.)
- g) Period of permission
- h) Other (Please Identify)
Sound insulation

21) Please use the attached spreadsheet to provide data on planning applications for places of worship (including new development, extensions and change of use to/from places of worship) in your borough since 2000. (Attached/Not attached)

a) Please provide the following information:

- i) Type of application (e.g. change of use, new development, redevelopment or demolition)
- ii) Brief description of proposal, including type of place of worship
- iii) Decision (including reasons for refusal, where appropriate)
- iv) Date of decision
- v) Permission status (started, not started, completed, don't know)
- vi) Proposed increase/decrease in floor space of place of worship
- vii) Listed Building status

22) In determining planning applications for a new place of worship, does your borough impose a condition that prevents the subsequent use of the building for other activities within the D1 Use Class? (Yes/No)

a) If yes, how often are such conditions imposed?

- Always
- Sometimes
- Never
- About 50%

23) In granting planning permission for a community use (D1) (non-residential institutions), does your borough impose a condition that would prevent the use of the building as a place of worship? (Yes/No)

a) If yes, how often are such conditions imposed?

- Always
- Sometimes
- Never

24) Does your borough use Section 106 Agreements to address planning objections for places of worship or reinforce planning conditions? (Yes/No)

a) If yes, how often are such agreements imposed?

- Always
- Sometimes
- Never

b) If yes, please provide examples of where a Section 106 Agreement has been used to address planning objections or reinforce planning conditions. (Attached/Not attached)

.....
.....
.....

.....
.....