

OVERALL SUMMARY AND CONCLUSIONS

340. Policy 3A.19 of the recently updated The London Plan 2008 (LP) and the related 'Planning for Equality and Diversity in London' Supplementary Planning Guidance (SPG) together recognise and support the demand for the provision of different and 'larger' places of worship in London ('larger' is not further defined). The SPG urges that Boroughs respond to this trend by identifying needs and sites for such development 'where there are significant clusters of faith groups' and 'where there are high concentrations of ethnic and religious groups requiring specific services'. In respect of high trip generating development, this support is further qualified in the LP Policy 3C.1 which 'in general' supports such development 'only at locations with both high levels of public transport accessibility and capacity, sufficient to meet the transport requirements of the development'. That accords with wider sustainable development policy objectives in both The London Plan and in national PPG13 'Transport'.
341. For reasons set out in paragraph 319 above I do not consider that Havering qualifies as having a 'significant cluster' or 'high concentration' of the ethnic and religious groups which this development would mainly serve, either now or in the foreseeable future. In these circumstances it is unsurprising that the recently adopted London Borough of Havering Local Development Framework suite of documents does not identify sites for development of this type. Neither did the Appellants seek the allocation of the appeal site for this purpose when they made other representations on the emerging LDF and at a time when they had already reached conditional agreement to acquire the appeal site which was designated for different employment development. The LDF does provide policy support for the provision of community facilities including places of worship but LDF Core Strategy (CS) Policy CP9 seeks the co-location of major trip generating community and other uses in places with good public transport accessibility. CS Policy CP8 also seeks that all new community facilities are located where they will be accessible by a range of transport, including walking and cycling.
342. Whilst the BR5 Business Park is well located for the national road network and there are local public transport links, the appeal site has very poor accessibility by public transport, walking and cycling for the communities that it will mainly serve who are concentrated in other parts of London. The development would not make a significant contribution to necessary local public transport improvements which are referred to in the development plan but which are currently uncertain to come forward because of a lack of funding. The poor public transport accessibility is exacerbated by the very large scale of the proposed development; especially the exceptionally large 8,000 seat main auditorium but also the much expanded floorspace for other uses by comparison with the accommodation provided at the organisation's previous sites. Consequently a very high number of trips would be generated by the proposed use, and not only on Sundays. The environmental and other adverse impacts of those trips would be increased by the distance between the site and the areas

where most congregants live especially in inner north east London and south of the River Thames.

343. Whilst LP Policy 3C.1 uses the term 'in general' and the SPG acknowledges that 'good public transport accessibility may not always be possible due to the limited availability of suitable sites', I conclude that the very large scale of this proposed development, the very high number of trips to be generated, and the remoteness from the main communities it is intended to serve means that an exception is not justified in this case to the policy presumption in favour of locations for community facilities and major travel generators with good accessibility by public transport, walking and cycling.
344. The harm in relation to poor accessibility by means other than the car is not overcome by the complex and costly Travel Plan which remains incomplete and which includes important elements that have not yet been subject to public consultation. The proposed arrangements for access by private coach and minibus and to control parking are not certain of success having regard to the logistical difficulties and the risk of delays and congestion both on and off-site. They would not allow for the efficient use of the main auditorium throughout the week and would not achieve a low modal share for car users for most activities. Neither would the targeted modal share on Sundays necessarily be achieved.
345. The above harm is compounded by the conflict with the employment objectives for the regeneration of the area. The site specific employment designation set out for the appeal site in recently adopted policies has been subject to full statutory public consultation during the preparation of the LDF and has attracted strong local support. The planned local growth in housing and population needs to be supported by new employment if high levels of out-commuting are not to persist. To allow a substantial departure from such policies within a year of their adoption would seriously undermine confidence in the LDF process. Neither would the proposed development be likely itself to make a substantial contribution of new paid employment to address the employment needs of an area. Whilst an overall surplus of employment land has been identified in east London, this is being addressed in Havering and other Boroughs by the release for alternative development of sites that are less suited to new employment than is the appeal site.
346. Finally, whilst I acknowledge that KICC is highly valued by its members and makes a positive contribution to the communities in which it operates, the full benefits of that work would be made more difficult to achieve because of the remote location of the appeal site from most of those communities. KICC does need a larger main auditorium than it presently has at Hoe Street. However its own site search only sought a 3,500 seat capacity auditorium until the appeal site was offered to KICC by the LDA, after which the capacity was increased to 8,000 notwithstanding the increased trip generation implications. Collective worship does not necessarily require a venue of that very large size. KICC also needs other facilities but these do not necessarily all have to be on the same site. Sites of sufficient scale to accommodate all the facilities are likely to be scarce. However even if it were accepted that the development should be on one site and needs to include a very large auditorium, I consider that the exceptionally high number of trips that would be generated, not only on Sunday, means that a site with good public transport accessibility would be essential.
347. The Olympics site and the rest of the Lower Lea Valley are closer to the communities which the facilities are intended to serve and will benefit from greatly enhanced public transport. Much of the land remains uncommitted for development after the Olympics in any up to date formal development plan.

Neither has the emerging Legacy Masterplan Framework for that area been finalised or incorporated into such development plans. However if no site of suitable scale can be identified there, consideration needs to be given to meeting the needs of KICC on one or more smaller sites which would be suitably located for access by means other than the car to the communities which the facilities are intended to serve.

348. I conclude that the acknowledged benefits of, and need for, improved accommodation for KICC in London, and the qualified planning policy support for the provision of community facilities do not outweigh the identified harm that development at the appeal site would have for the employment and sustainable travel objectives of the development plan.

RECOMMENDATION

349. For the above reasons I recommend that the appeal should be dismissed.

RPE Mellor

INSPECTOR