



# Responding to the needs of faith communities: places of worship

Final Report

Revisions following client comments

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

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# Executive Summary

CAG Consultants with Diverse Ethics and Land Use Consultants were commissioned by the GLA in late 2007 to explore the needs of faith communities in relation to places of worship in London. This document reports on our findings and conclusions from the research and engagement process with faith communities and planning authorities in relation to places of worship in London.

There is a companion document to this report, the Evidence Report, which provides detailed evidence to support the conclusions and recommendations made in this report.

The research and stakeholder engagement have been undertaken in a number of ways. We have:

- Interviewed a diverse range of faith communities and interfaith groups across London;
- Analysed a considerable number of postal and online questionnaires from faith groups about development needs, issues and possible solutions;
- Collected and analysed a wide range of planning data from the 33 London Planning Authorities and other relevant sources that helped build a picture of the way the planning system responds currently;
- Scrutinised all planning applications relating to places of worship since 2000;
- Scrutinised all planning appeals relating to places of worship since 2000;
- Developed a series of case studies of good and not-so-good experiences of faith communities with the planning system; and
- Held a stakeholder workshop with faith communities and planning authorities at which we fed back results from the research and consultation and received views about solutions and recommendations for the future.

We have taken into full account all the data generated by these sources in developing this final report which is structured as follows:

- Following a brief introduction, a short background Section 2 sets out the issues, and refers briefly to the policy context;
- Results from the range of planning research are presented in Section 3;

- Results of the engagement process with faith community and planning authority stakeholders are then presented in Section 4;
- Conclusions and recommendations relating to planning policy, spatial and process issues are set out in Section 5.

The conclusions and recommendations draw on findings set out in the report, and in the accompanying Evidence Report. In summary, we recommend that the London Plan and a specific Supplementary Planning Guidance document should address a number of planning issues raised both by stakeholders and the planning analysis. We also recommend that the Mayor - in conjunction with partners and other stakeholders - consider a range of additional spatial and process based methods to improve the response of the planning system to worship space needs in London in future. The recommendations are outlined here but are best-understood if read in conjunction with sections 5.2. and 5.3. of this report:

1. We recommend that a further alteration of the London Plan should include specific policies on places of worship, addressing the need for places of worship (taking account of their wider social and economic roles) and supporting the retention of existing places of worship and appropriate proposals for new or expanded places of worship.
2. We recommend that the policies should be accompanied by guidance (SPG or another form of guidance), which addresses *how* the Boroughs should undertake a needs assessment and the policy and development control mechanisms that can be used to meet identified needs.
3. We recommend that the policy framework is based on an understanding of two key variables: the different types of places of worship that are needed; and the range of appropriate planning policy and other responses that can be used to respond to these needs.
4. We recommend that the London Plan guidance on needs assessment should focus on type 3 and type 4 places of worship. Type 3 places of worship might lend themselves to a 'standards' based approach, whereby an agreed amount of land is set aside for different population levels (e.g. 0.5 hectares of land per 3000 population).
5. We recommend that London Plan guidance should outline the key planning issues associated with places of worship and how planning conditions can be used to address them.
6. We recommend that policies on employment areas do not rule out the possibility of places of worship, provided that other material planning considerations are met. The onus should be placed on the planning authority to weigh up the need for employment land and for places of worship, rather than expecting faith groups to do this on a case-by-case basis.

7. We recommend that, where unauthorised uses exist, the Mayor should encourage Boroughs to make sensitive use of enforcement powers
8. We recommend that Design Briefs and Master Plans for the Opportunity Areas respond positively to identified needs by providing land/space for faith communities.
9. We recommend that the Mayor should undertake further research into the design issues associated with places of worship, taking account of the typology of places of worship in Table 7, above, the views of faith communities, and specific access requirements for older and/or disabled people.
10. We recommend that the Mayor should undertake supplementary research into unauthorised places of worship in London.
11. We therefore recommend that the Mayor should consider the need for a flagship multi-faith worship, educational and cultural space in London.
12. We recommend that the Mayor work with the 33 London Planning Authorities, faith stakeholders and relevant institutions such as schools, property owners and others with interests in the process to consider the opportunities for shared use of space with schools, offices, community halls and other identified land use types not currently being fully utilised.
13. We recommend that the Mayor should consider the following:
  - Working with London Boroughs and through the Mayor's own master planning processes (of which more below), to ensure worship space needs are taken into account when large-scale new community facilities like conference, sporting and cultural venues are being designed and planned in London;
  - Working with London Boroughs to ensure they have in place better 'process' arrangements including providing good levels of pre-application advice to help faith communities in negotiating their way through the planning and heritage systems;
  - Working with London Boroughs to ensure faith communities receive assistance in identifying and securing external funding sources to help meet their worship space expansion aspirations;
  - Working with London Boroughs to consider forming independent faith advisory groups at each Borough level;
  - Working with London Boroughs to employ faith officers at Borough level who would co-ordinate many of these tasks.
14. We recommend that the Mayor considers how best to support more developed partnership working between faith groups, planners, landowners and developers.

15. We recommend that the Mayor discuss with faith communities and interfaith forums how faith communities can be supported to improve their planning skills.

16. We recommend that the Mayor's guidance on worship space needs should encompass specific guidance on how to carry out successful ongoing consultation and engagement between boroughs and faith communities, and between faith communities and potential objectors.

# 1. Introduction

## 1.1. Purpose of the final report

1.1.1. CAG Consultants with Diverse Ethics and Land Use Consultants were commissioned to explore the needs of faith communities in relation to places of worship in London. The purpose of this document is to report on our findings and conclusions from the research and engagement process with faith communities and planning authorities in relation to places of worship in London. There is a companion document to this report, the Evidence Report, which provides copies of the series of working papers, workshop proceedings, case studies and briefing notes we have submitted to the GLA over the course of the project. This collection of documentation of the research streams provides detailed evidence to support the analysis, conclusions and recommendations made in this report.

## 1.2. Background to the research and stakeholder engagement 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. The London Plan (Consolidated with alterations since 2004) contains policies that seek to respond to the needs of London's diverse communities (Policy 3A.17) and protect social and community infrastructure, including places of worship (Policy 3A.18). The Mayor has produced Supplementary Planning Guidance on 'Planning for equality and diversity in London' 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 Pentecostal churches that are largely made up of African and Caribbean populations. **Figures 1.1a and 11.1b** provide an indication of the spatial distribution of faith groups within London, based on 2001 Census returns.



## 1.3. About the work - methods used

1.3.1. The research and stakeholder engagement to explore faith communities worship space needs was undertaken in a number of ways by CAG, Diverse Ethics and Land Use Consultants. We have:

- Approached 24 members of a diverse range of faith communities and interfaith groups across London with a view to interviewing them. We have successfully completed 13 detailed interviews. 11 other stakeholders either declined to be interviewed or did not respond to our invitation (made by email with follow up phone calls);
- Received 20 filled-in questionnaires by post from faith groups about development needs, issues and possible solutions;
- Received 140 filled-in online questionnaires or comments (downloadable from a web page set up for the purpose of advertising the project). Again these covered development needs, issues and possible solutions;
- Collected and analysed a wide range of planning data from the London Planning Authorities and other relevant sources that helped build a picture of the way the planning system responds currently. This included a questionnaire survey of all 33 London Planning Authorities, which yielded 22 responses (67%);
- Scrutinised 602 planning applications relating to places of worship since 2000. The applications were identified by the London Boroughs in their responses to the planning questionnaire or, where boroughs did not provide the data, we used the GLA's London Development Database (LDD);
- Scrutinised all planning appeals relating to places of worship since 2000;
- Developed a series of case studies of good experiences of faith communities with the planning system; and
- Held a stakeholder workshop to which over 60 stakeholders from faith communities and planning authorities were invited. 26 stakeholders attended. At the workshop we fed back results from the research and consultation and received views about solutions and recommendations for the future.

1.3.2. We have taken into account the data generated by all these sources in developing this final report to the GLA. The report is structured as follows:

- Following this introduction a short background section - Section 2 - sets out the issues, and refers briefly to the policy context;
- Results from the range of planning research are presented in separate section - Section 3;

- Results of the engagement process with faith community and planning authority stakeholders is then presented - Section 4;
- Finally our conclusions and recommendations are set out - Section 5.

## 2. Background

### 2.1. Recognising the role of faith communities

2.1.1. We note that currently there are around 2,200 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, returned questionnaires and stakeholder workshop discussions, 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.

2.1.2. Currently in London, however, many faith communities are constrained by inadequate facilities from providing the level and range of social services and activities they have the capacity to offer. In other words, faith groups bring an offer; they don't just place a demand on the planning system but this may not be as widely recognised as it ought to be.

### 2.2. Inadequacy of provision for places of worship

2.2.1. Finding space for worship in London 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.

2.2.2. Today, high land values and site scarcity prohibit the development or extension of places of worship in suitable locations such as close to town centres and transport nodes. Adequate provision of sufficient land and /or buildings with D1 (Non-residential Institutions) 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.

2.2.3. While shared use of space between faith groups is a potential solution, for some groups theological reasons would prevent this. There is potential for use of school and other community buildings. While this can be a temporary solution, it is not attractive to faith groups in the long term. There may also be legal issues which need to be addressed.

2.2.4. 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.

## 2.3. Current policy context - national, regional and borough level

2.3.1. In recent years, there has been a growth of faith related policy at national level, both from government and non-governmental organisations. 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). Among relevant faith policies, the Commission for Equality and Human Rights has produced substantial publications on faith issues, while the Sustainable Development Commission's *Faith in Action* project "attempts to show the multiplicity of initiatives taking place across the UK, and points the way forward for other faith groups who share a concern for social justice and environmental issues".

2.3.2. Twenty-one years since the highly influential *Faith in the City Report*, a recent follow up, *Faithful Cities* (2006), from the Commission for Urban Life and Faith notes that:

*Looking back over the last two decades, the Commission saw many changes, particularly the increasing prominence of many different faith communities within our cities. Despite falling unemployment and inflation, the last 20 years have seen a widening gap between the richest and poorest people in Britain. Faithful Cities outlines the distinctive contribution that faith communities can make to these problems, offering a message of renewal, encouragement and hope to Britain's cities.*

2.3.3. That picture shows how critical the connections between faith, planning and regeneration have become. Some faith communities themselves have produced detailed guidance that recognises the importance of planning decisions on places of worship, such as the Church of England's *Building Faith in our Future* (2004). The Joseph Rowntree Foundation meanwhile has highlighted the importance of engaging faith communities in regeneration processes (*Engaging faith communities in urban regeneration*, 2003) and initiatives such as Faith in Business are intended to "build the capacity of Black-majority churches to enable them to play a greater role in economic and regeneration schemes by providing assistance and training in areas such as applying for funding, strengthening internal finance and administrative systems and efficient data collection and management". Likewise, there here have been outstanding individual programme initiatives that have sought to connect faith communities and

climate change action such as Faiths4Change's Operation EDEN ("Faith-based solutions for fractured communities", Urban Clearway, Issue 59 - February 2008, Urban Forum).

2.3.4. At the same time, this policy area is by no means uncontentious. For example, a recent report by the National Council for Voluntary Organisations, *Faith and Voluntary Action* (2007) argues there are risks in treating faith communities separately, thus:

*Whilst faith-based organisations (such as religious congregations, local community groups and charities) are distinctive, by treating them as separate from secular charities or community groups, there is a danger that policy makers will alienate civil society. In particular, NCVO is concerned that both secular and faith-based organisations feel, at times, discriminated against when applying for Government funding and excluded from policy discussions.*

2.3.5. In regard to faith and planning in London we see the broadest policy 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. One of the four pillars of sustainable development, as set out in the 1999 UK Sustainable Development Strategy<sup>1</sup>, is '*social progress which recognises the needs of everyone*'. As such, Planning Policy Statement 1<sup>2</sup> states that:

*Development plans should promote development that creates socially inclusive communities, including suitable mixes of housing. Plan policies should:*

- *ensure that the impact of development on the social fabric of communities is considered and taken into account;*
- *seek to reduce social inequalities;*
- *address accessibility (both in terms of location and physical access) for all members of the community to jobs, health, housing, education, shops, leisure and community facilities;*
- *take into account the needs of all the community, including particular requirements relating to age, sex, ethnic background, religion, disability or income.*

2.3.6. Further guidance on the role of the planning system in promoting social cohesion and inclusion is proved in good practice in relation to diversity and planning<sup>3</sup>. However, there is a noticeable absence of specific guidance how the planning system should meet the needs of different faith communities. At the London level, the Mayor's

<sup>1</sup> A Better Quality of Life – A Strategy for Sustainable Development for the UK – CM 4345, May 1999.

<sup>2</sup> Planning Policy Statement 1: Delivering Sustainable Development, DCLG, 2005

<sup>3</sup> "Diversity and Equality in Planning: A Good Practice Guide", ODPM, 2005

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'.*

2.3.7. The Supplementary Planning Guidance on Diversity and Planning includes a sub-section on supporting places of worship (Implementation Point 4.5c, Mayor's Supplementary Planning Guidance, p.87) that explores the finer-grain spatial implications of worship space location for local areas and encourages multi faith spaces where possible. It 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'.*

2.3.8. However, despite these formal planning policies, our survey of the London Planning Authorities indicates very limited awareness of the Supplementary Planning Guidance 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. The findings from our engagement process with faith communities appear to reinforce this conclusion. This also seems to be in line with wider research findings into diversity and planning, which revealed that about a quarter of local planning authorities 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).

# 3. Operation of the planning system

## 3.1. Methodology

3.1.1. On the planning research side of the project we examined in as much detail as we were able the recent operation of the planning system in London with regard to places of worship. This included:

- A questionnaire survey of all 33 London Planning Authorities, which yielded 22 responses within the timescale allowed (67%)<sup>4</sup>;
- Scrutiny of 602 planning applications relating to places of worship since 2000. The applications were identified by the London Boroughs in their responses to the planning questionnaire or, where boroughs did not provide the data, we used the GLA's London Development Database (LDD)<sup>5</sup>. It cannot be assumed that all planning applications relating to places of worship were captured by this method, as the LDD has a minimum floorspace threshold of 1000 square metres for any application;
- Scrutiny of all planning appeals relating to places of worship since 2000; and
- Development of case studies of good examples of faith communities with the planning system.

The results in all these areas are outlined in this section. The case study results are presented in boxes through the text in Section 3.

## 3.2. Analysis of planning applications

### Number and distribution

3.2.1. 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. As noted above, details on planning applications within these boroughs were obtained from the LDD.

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<sup>4</sup> One additional response was received beyond the timescale allowed, which meant that it was not possible to take account of the data in the overall findings. However, this response is included as an appendix in the accompanying Evidence Report.

<sup>5</sup> <http://www.london.gov.uk/mayor/ldd/index.jsp>

**Table 1:** Number of applications by London Borough since 2000

| Number of Applications by London Borough |    |                                 |            |
|--|----|---------------------------------|------------|
| <i>Barking &amp; Dagenham</i>            | 6  | Hounslow                        | 13         |
| Barnet                                   | 11 | <i>Islington</i>                | 12         |
| <i>Bexley</i>                            | 3  | <i>Kensington &amp; 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                       | 87         |
| 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  | <b>Total</b>                    | <b>602</b> |

### Overall rate of approval

3.2.2. 73% of the applications were approved. This compares with an approval rate nationally of all planning applications (for all types of development and change of use) of around 80%. This figure of 73% should be treated with caution because, as outlined below, it includes applications involving a net loss of places of worship.



### Types of application

3.2.3. As shown in **Table 2**, ten different types of application were submitted. However the majority (86%) were for:

- Change of use (of a building either to or from a place of worship) (36%);
- New development (a new building) (26%); or
- Redevelopment (demolition and reconstruction) (26%).

**Table 2:** Type of Application for Place of Worship

| Type of Application  | Number of Applications |
|--|------------------------|
| Certificate of Lawfulness  | 1                      |
| Change of Use (of a building either to or from a place of worship) | 217                    |
| Demolition   | 2                      |
| Extension  | 54                     |
| Listed Building Consent  | 2                      |
| Mixed  | 2                      |
| New Development (a new building)                                   | 156                    |
| Redevelopment (demolition and reconstruction)                      | 157                    |
| Renewal  | 10                     |
| Variation  | 1                      |
| <b>Total</b>   | <b>602</b>             |

### Changes of use

3.2.4. Of the 217 applications for change of use involving a place of worship, 160 (74%) 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).

3.2.5. As shown in **Table 3** below, the rate of approval of applications for changes of use to places of worship was 54%, which is well below the national average for all planning applications. A further 8% of such applications were withdrawn before the local authority made a decision. Although we were unable to ascertain the reasons for withdrawal of applications, it is often the case that applicants withdraw applications because the planning authority advises them that a refusal of planning permission is likely.

3.2.6. On the other hand, 90% of applications for changes of use from a place of worship were approved and none was withdrawn.

**Table 3:** Number of Applications for Change of Use to/from a Place of Worship

| 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%)   |

### New development

3.2.7. Of the 156 applications for the development of new places of worship 73% were granted permission. As shown in **Table 4**, 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.

**Table 4:** Applications for new development of places of worship

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

**Redevelopment**

3.2.8. Of the 157 applications for redevelopment, 54% involved an existing place of worship. 89% of these applications were approved, as shown in **Table 5**. However, the data do 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.

### Redevelopment of a Church site within a central location

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.

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.

After three refusals of planning permission on the grounds of adverse impacts on the surrounding Conservation Area, the Church appealed to the Secretary of State (Appeal Ref. APP/V5570/A/99/1029793). 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 considered that the benefits of retaining the Church use on the site would outweigh any adverse impacts on the Conservation Area.

#### Case Study 1

3.2.9. 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.

3.2.10. The remaining 85 applications for redevelopment involved a net loss of places of worship. 89% of such applications were approved.

**Table 5:** Number of Applications for the Redevelopment of a Place of Worship

| Redevelopment resulting in: | Total Applications |            |          |
|-----------------------------|--------------------|------------|----------|
| Gain of place of worship    | 23<br>(15%)        | Granted    | 22 (96%) |
|                             |                    | Refused    | 0 (0%)   |
|                             |                    | Withdrawn  | 0 (0%)   |
|                             |                    | Pending    | 0 (0%)   |
|                             |                    | Don't know | 1 (4%)   |

|  |             |            |          |
|--|-------------|------------|----------|
|  |             |            |          |
| Loss of place of worship                   | 49<br>(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<br>(54%) | Granted    | 76 (89%) |
|  |             | Refused    | 4 (5%)   |
|  |             | Withdrawn  | 2 (2%)   |
|  |             | Pending    | 0 (0%)   |
|  |             | Don't know | 3 (4%)   |

3.2.11. 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. 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.

### 3.3. Analysis of planning appeals

3.3.1. Out of a total of 602 planning applications relating to a place of worship, 27% were refused. Based on a search of planning appeals<sup>6</sup> we identified 15 planning appeals since 2000. Of these 15 appeals, five were upheld and 10 were dismissed, as set out in **Table 6**.

<sup>6</sup> Compass Planning Appeals service

**Table 6:** Analysis of planning appeals

| <b>Types of Planning Appeal</b>   | <b>Total number of Appeals since 2000</b> | <b>Number upheld</b> | <b>Number dismissed</b> |
|---|---|----------------------|-------------------------|
| Against refusal of planning permission for places of worship on employment / industrial site            | 6   | 2                    | 4                       |
| 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                       |
|   | <b>15</b>                                 | <b>5</b>             | <b>10</b>               |

3.3.2. 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.

### Realising opportunities in designated employment areas

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.

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.

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 (Appeal Ref APP/L5240/A/07/2036071). 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.

### Case Study 2

#### Reasons for upholding appeals

3.3.3. We explored the reasons for upholding appeals against refusal of planning permission for places of worship on employment/industrial sites. These were:

- 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; and
- Lack of suitable alternative premises, particularly in town and local centres.

3.3.4. We next explored the reasons for upholding appeals against enforcement notices served on a place of worship in employment/industrial sites. We found the following reason:

- The 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

3.3.5. We explored the reasons for dismissing appeals against refusal of planning permission for places of worship in employment/industrial sites. The following were identified:

- 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 Unitary Development Plan policy on employment use; and
- Proposal is within an area of London-wide importance for B1, B2 and B8 land uses.

3.3.6. We next scrutinised the reasons for dismissing appeals against an enforcement notice served on a place of worship in employment/industrial site and found the following:

- Loss of the appeal site as an employment site would undermine the aims of Unitary Development Plan policy on safeguarding employment sites;
- Poor transport links surrounding the appeal site;



- Development would compromise the 2012 Olympic Bid (appeal site falls within Olympic regeneration area).

### **Upholding appeals against refusal**

3.3.7. We next considered reasons for upholding appeals against refusal of planning permission to vary planning conditions. These 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.

### **Dismissing appeals against refusal**

3.3.8. We identified reasons for dismissing appeals against refusal of planning permission to vary planning conditions

- 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.

### **Appeals with mixed outcomes**

3.3.9. 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. A number of reasons were cited for upholding appeals against refusal of planning permission for change of use to place of worship from a shop:

- 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.

3.3.10. Reasons for dismissing appeals against refusal of planning permission for change of use from a place of worship to live/work units were as follows:

- It was thought this would result in the loss of a community facility contrary to the provisions of the Development Plan and outweighed any harm in relation to employment floor space.

### **3.4. Unitary Development Plans and Local Development Frameworks**

#### **Policy coverage**

3.4.1. Out of the 22 responses to the questionnaire, all but three of the planning authorities that responded have existing Unitary Development Plan policy, and would expect emerging Local Development Framework policy, to provide direction on determining applications for places of worship. However, most borough policies are 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.

3.4.2. There is some evidence that, whilst some Unitary Development Plans include specific policy on places of worship, policy in emerging Local Development Frameworks 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.

3.4.3. Only the London Boroughs of Haringey and Newham reported that they have adopted and/or have emerging Supplementary Planning Guidance/Documents relating to places of worship.

### Developing a 'standards' based approach to provision

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).

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.

#### Case Study 3

### Assessment of Need for New Provision

3.4.4. When asked if Unitary Development Plan policy and/or emerging Local Development Framework 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'. It was also reported that it is very difficult to assess needs in the absence of any reliable data and in the face of a rapidly changing population. Planners are also aware of the sensitivity of this issue and that they do not want to be seen to meeting the needs of one group, potentially at the expense of another.

3.4.5. 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 planning a major regeneration area or 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 Unitary Development Plans or Local Development Framework. Camden Council has a Faith Officer and a Faith Forum, which advise on a case-by-case basis.

3.4.6. In the absence of a robust assessment of need for places of worship, planning applications are therefore considered in the light of generic policies on community facilities and all other relevant policies or plans. In contrast, policies on

housing and employment uses, for example, generally are based on a needs assessment. This is likely to be a key factor in the relatively high rate of refusal of planning applications for places of worship.

**Role of Faith Partnerships in assessing needs**

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.

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.

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.

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.

Case Study 4

## 3.5. Pre-application advice, consultation, objectors and planning conditions

### Advice

3.5.1. Faith groups appear to make limited use of the opportunity to obtain pre-application advice from borough planning officers. No borough was able to quantify precisely the number of pre-application discussions that have taken place since 2000 with faith groups; however, they estimated the number to be between one and five.

3.5.2. This is perhaps a reflection of the findings of the engagement with faith groups that they are often unfamiliar with planning processes. However, Planning Aid for London has been approached by faith groups on numerous occasions since 2000.

### Consultation arrangements

3.5.3. With regard to consulting faith groups on plan preparation, planning officers reported that they are unclear whom to consult. Only very few Boroughs have established a faith forum and databases of relevant contacts tend to become out of date very quickly. The rate of turnover of planning officers militates against 'local know-how'. This might be further exacerbated by the turnover of representatives of the faith communities.

3.5.4. 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.

### Taking a positive approach to faith consultation

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.

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.

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.

#### Case Study 5

##### Objectors' concerns

3.5.5. Planning officers reported that the principal concerns of consultees with regard to planning applications for places of worship were the impacts of traffic, parking and noise. They also indicated that places of worship can be perceived as a 'bad neighbour' and the cause of local controversy at the planning application stage.

3.5.6. Out of the 22 responses to the questionnaire, 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.

3.5.7. From the analysis of planning appeals reports it emerged that 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. This was due to the level of activity associated with the place of worship exceeding what is considered normal for the area that 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 land use being approved. These reasons for dismissal correspond with the main objectors concerns identified in the survey of 33 London Planning Authorities, i.e. impacts of traffic, parking and noise.

3.5.8. Also from the analysis of planning appeals reports 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 London's Planning Authorities that shows a considerable number 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.

### **Use of Planning Conditions to Protect and Prevent Places of Worship**

3.5.9. 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. This limited use of conditions to protect places of worship from change of use to other D1 uses is likely to be a key factor in the gradual loss of places of worship.

3.5.10. 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. This is also an important factor in limiting the 'organic' development of places of worship, which in some instances could better be described as a 'space for worship'.

### **Effective use of planning policy to protect existing places of worship**

In 2003 a Brethren's Gospel 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 hectare site was predominantly medium / high density residential. The Trust considered the site to have residential redevelopment potential.

The development plan at that time was the London Borough of Ealing Unitary Development Plan (UDP) adopted August 1995 with First Alterations January 1998 and further alterations 2000. The revised UDP was at Public Inquiry stage. Both the adopted UDP and emerging 'deposit draft' contained policies to resist the loss of existing community uses, unless the developers made available 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.

In the light of this, the Trust's planning adviser's, J&J Design, advised against an early planning application 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.

Given the restrictive planning policy context, the Trust decided to sell the site as an existing Place of Worship. It was purchased at auction in 2005 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.

#### Case Study 6

### **Unauthorised Activities and Enforcement**

3.5.11. Information provided anecdotally by the boroughs and by Planning Aid for London suggests that there are a large number of unauthorised places of worship in London. These occur mainly at the fringe of employment areas in both inner and outer London boroughs. Faith groups have resorted to using inappropriate buildings in inappropriate locations because of a lack of more suitable alternatives. The significant number of applications for change of use (outlined above) reflects this issue.



# 4. Experiences of faith communities

## 4.1. Findings from engagement with faith communities

4.1.1. The findings summarised in this section are drawn from the various engagement sources explored through the project. The engagement aspects summarised here come from four main sources: data from 14 engagement interviews, 140 online (not all responses were fully completed questionnaires) responses, 20 postal questionnaires or responses, written material such as guidance and reports given to us by faith communities, and the stakeholder workshop proceedings. The findings are organised into the following categories:

- 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.

4.1.2. It should be noted that the views expressed below are those of faith communities themselves, as recorded by us. We try to make clear by use of quotation marks and clear referencing to stakeholders while ensuring we maintain their anonymity. We try to also make clear in the text where we are drawing conclusions from faith communities views.

4.1.3. Through the engagement process we endeavoured to achieve wide coverage across faith groups, within limited project resources and a relatively short timeframe. We experienced difficulties in securing interviews with some faith communities. In a few cases communities have not responded to repeated contact attempts for unknown reasons, so where possible interviews with alternative groups from the same faith community have been pursued instead. The data from online and postal questionnaire responses, reports sent in by faith communities, and from the Stakeholder Workshop Proceedings, has helped to compensate for the few interviews that we could not secure. The structure of the online and postal questionnaires was based on a detailed Interview

Pro Forma developed for the programme and agreed by the client. A copy of the Pro Forma is found in the accompanying Evidence Report.

## 4.2. Development needs

4.2.1. A number of communities report that they would like to provide better facilities. Among areas they mentioned were increased size of premises, facilities for disabled people, being closer to public transport, more parking and space for community facilities. In relation to expansion, we heard from faith communities that 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 more established communities. While current provision of worship space varies, almost all communities interviewed say they are growing and have unmet worship space expansion needs and aspirations.

4.2.2. More established faith communities say they are finding that sometimes the long-term location of their worship space no longer presents the best spatial fit for their needs. They say this is particularly the case when area based regeneration is underway, such as housing estate renewal into more mixed-use communities. Faith communities report that they 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.*

4.2.3. The sharpest issues in terms of projected need are reported by Evangelical and Pentecostal faith communities who say they are currently experiencing very significant pressure on existing facilities and constraints on future growth. They believe 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.*

4.2.4. Muslim faith communities say they 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.*

4.2.5. Among both longer term and newer faith communities some say they are finding their current facilities no longer provide the best spatial fit for their worship needs. One stakeholder commented, "our congregation is growing. We want to move to bigger premises but there are no premises available that the Council are prepared to give planning permission on". Some note that the "very high cost" of renting other facilities, and the expense and scarcity of new sites - land and buildings - is a substantial barrier to expansion. One made the point that "it is not cost effective to continue hiring various locations and the added logistics of transportation, which would be avoided if we have a facility that could accommodate all the events and services we provide". A questionnaire respondent summed up their church's view of the situation, saying their church was struggling, with projects on standby because they were hampered by lack of suitable premises. Although no stakeholders suggested government should subsidise them financially they say they feel that more support could be offered in other ways.

4.2.6. Moreover, we heard from some faith community stakeholders that they perceive a lack of faith literacy and cultural awareness by some councillors, planning and policy officials at local, regional and national level. One stakeholder says that this could amount to 'ideological opposition' to faith communities and should be addressed. One questionnaire respondent argued, "many of our linked churches have come back with the same issue. As soon as the council see that ONE of the aims is to tell people about God they get refused". Another suggested that there is a certain amount of anxiety about equity of access to new sites, which could be better handled. Recent difficulties with the planning system reported to us by stakeholders are felt by them to have exacerbated the situation for faith communities suffering from worship space shortages. A well known examples where a Pentecostal church failed to obtain planning permission on a new site, having been persuaded to move there, they say reinforces a sense that faith communities are not receiving fair treatment in the planning system.

4.2.7. For most communities stakeholders say that peaks in use of worship space are cyclical and times of peak demand can cause local impacts like noise and car parking. Communities point out that they can find this especially difficult because they are outgrowing or have outgrown their current premises. They note that some communities can deal with peaks in use fairly well because they have reasonable amounts of space, and communities demonstrate creativity about using that space to its maximum. Typical responses are as follows:

*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.*

*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.*

4.2.8. According to stakeholders, methods by which faith communities cope with increases in demand vary. Some communities explain that 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.*

4.2.9. 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 say 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.*

4.2.10. Other communities say they find this more difficult because they are outgrowing or have outgrown their current premises. They argue that 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. They say that there are also issues with the planning system that impact on this situation such as refusals of planning approvals to locate at new sites. Some communities say they are aware their expansion plans may be viewed negatively by the local community because of impacts they could cause. One commented that

*If we expand, we in turn impact negatively on the very community we would like to serve. Our case is very serious. There are many needs to be met in society by a church like ours. We cannot do all we can if our location is not acceptable to the locals. So, we are not coping. We turn people away because we have not got the premises capacity or the financial capacity to meet the needs of all who come to us.*

4.2.11. Another group commented in relation to impacts that:

*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.*

4.2.12. A number of stakeholders consulted say that the scale of this issue appears greatest for Pentecostal churches. Both interviewees and questionnaire respondents 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 they say communities are growing particularly fast. Some say that sharing spaces is 'the obvious way forward' and a multi faith group commented that "city churches do share with other faiths. There is increasing diversity and small groups do not have resources of their own". However, not everybody suggests this is their preferred option and many say they oppose it, some quite vociferously.

4.2.13. There are a number of issues in relation to transport and access mentioned by stakeholders. A number of faith communities point out that they chose their current worship space site because it has good or excellent public transport links. They say though that there are still access issues for older and disabled worshippers who often find public modes difficult or impossible to use. Many communities demonstrated they are well informed in relation to the wider sustainability implications of their worship space locations. Some explain that they have formal Sustainable Development policies of which transport and access form a key part. Many say they have sought to locate near public transport nodes and lines and to maximise the use of transport forms that are the most environmentally benign and have the lowest impact on neighbours. Among the techniques they mention are encouraging use of bus, train and Underground and organising shuttle buses and car sharing arrangements. A number note they want to maximise accessibility by public transport and walking in any new premises they develop. Some say they understand very well the relationship between 'mode shifting' actions and reducing impacts on neighbours:

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

4.2.14. A number of stakeholders consulted say that car parking remains a big issue. While some groups explain they are happy with their level of car parking provision and most say they are 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. They point out that car parking is especially problematic for worship spaces located in outer London with poor or nonexistent public transport connections. They say that it is also a vexed issue for some faith groups; especially with particularly large congregations with wide spatial catchments such as Pentecostal/Charismatic churches. Perhaps unsurprisingly, given their spatial circumstances, these faith communities say they see a need for greater car parking provision. For example, "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". Another group meanwhile argue:

*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.*

4.2.15. Our initial conclusion from these points is that building in the most sustainable forms of access and thus limiting car parking 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.

4.2.16. Almost all the faith communities consulted say that they provide some level of wider services to their community around their worship space, demonstrating their faith through service to others. One stakeholder explains that "faith and social action go hand in hand". Stakeholders say that these activities can cover both a physical community and communities of interest. Larger faith communities report that they 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. Stakeholders explain this as follows:

*We are not just worshippers. We are servants of the community. We offer counselling, benevolence, advice, poverty alleviation etc. We meet people's spiritual, emotional, social, financial and academic needs. This is the true concept of Christianity, which we are a true custodian of. We are a relevant church for modern people.*

*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.*

4.2.17. Some faith communities say they have cross-subsidised their community services with other activities, making excellent use of their building stock assets in this way. In the case of one mosque the faith community explains it 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.*

4.2.18. Stakeholders from newer groups such as many Pentecostal churches, say their lack of adequate space is thought to be limiting their capacity to fulfil their welfare programmes. One example of many was of a faith group reporting having to cancel their Saturday school due to space constraints. Some say they also suffer from uncertainty about their current premises:



*The main constraint is that the landlord can kick us out with a maximum of 3 months notice only. This in particular has not allowed us to commence the nursery to compliment the only primary/nursery school around here.*

4.2.19. Many groups, both large and small, explain they are also involved in increasing literacy about faith issues. Given this, 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 say they have reached is that they do not really understand why this service provision role is not supported more wholeheartedly. As one pointed out:

*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.*

4.2.20. Many faith groups say they undertake home-based as well as centre-based worship. In some faith cultures, for example, home shrines and meditation spaces are common. Stakeholders report that a home church movement is growing. Some Pentecostal churches say they are diversifying into home based worship to help deal with space constraints. From the comments we received we would view this as predominantly a pragmatic response rather than an unconstrained choice. A number of stakeholders from different religious backgrounds say that worship at their religious space is a requirement for at least some of their worshippers. 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 stakeholders say that home-based worship is encouraged they take the view that it cannot replace the need to build worship spaces that people can attend to pray. For example:

*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.*

4.2.21. 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.*

4.2.22. A number of stakeholder say that there is a strong preference to share worship with other worshippers. Some make the point that “a vital part of our faith is coming together as a group to express our faith and worship together. While worship at home is important it cannot replace corporate worship and interaction with others”. Thus the initial conclusion we have reached on this point is that for most, home-based worship will not be able to replace worship at a shared space but will be more likely to

compliment it. Similarly, our conclusion is that 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.

### 4.3. Planning system experiences

4.3.1. We learnt from stakeholders from various religious backgrounds that experiences with planning applications vary widely. Some say they 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. 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.*

*The borough was very supportive of the development of our place of worship. We were allowed to access the building from the Council's car park at the rear of the building.*

4.3.2. Stakeholders from long-established, major faith communities say that their experience is predominantly positive, noting an understanding that faith communities are 'at the heart of communities'. They also reported a sense that this can vary depending on elected members' views. One stakeholder 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. A number said they thought councillors' views were very important in determining whether or not they would succeed in obtaining approvals:

*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".*

4.3.3. There were many responses that described negative experiences. Some stakeholders reported either firsthand difficulties experienced by their own faith community or examples of problems encountered by others in the planning approval process. A questionnaire respondent mentioned "over 4 rejected planning applications and many attempts at other buildings that did not work out because foreseeable planning constraints". Two relevant examples given by stakeholders are provided below:



*We have always experienced opposition from planning as soon as a place of worship is mentioned. We received temporary planning permission in 2001 to change the use of our building to a place of worship/community use. Now 7 years later the Council has refused to renew our planning permission and issued an Enforcement Notice on us to cease activities (within one month).*

*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.*

4.3.4. Another questionnaire respondent felt that “they had taken every step to meet whatever was required but [the local authority] has no intention of granting planning permission to any faith group at [employment location]”. This respondent went on to say they felt that given numerous meetings with officials and the way their “faith group used very experienced people within the profession [to support their planning application]...you can see that it is not about the process but a deliberate policy not to grant permission to faith groups”. A respondent alluded to what they describe as a particularly negative example, that of a faith group which was refused planning approval elsewhere after being persuaded out of the Olympics site. They say that this is symptomatic of the issues faced by larger scale applications. Stakeholders allude to a perception that bigger planning applications are more likely to be refused due to greater local opposition to them. A number of stakeholders comment that they have only received planning permission for their worship space on appeal after an initial refusal by the planning authority. Others say they have planning approvals pending.

4.3.5. The planning issues related to using industrial locations to meet worship space needs came up repeatedly. One stakeholder notes that they “have searched for D1 licensed premises but had no joy within the locality. We have had difficulty applying for change of use via the council. 1. Either we lose the property before application for change of use or 2. also the cost”. A questionnaire respondent says that “the lack of a suitable premises for the work of the church has meant that churches resort to industrial facilities that are sometimes not suitable or have no planning permission”. They went on to say, “for modern day churches to function effectively, premises are a key issue. Local authorities/GLA/Central Government must appreciate this need”.

4.3.6. Other issues cited by stakeholders are about the difficulties they say are inherent in dealing with both heritage-listed buildings and the complexities of the planning system at the same time. Some smaller groups report they have experienced issues around the heritage listing of some of their buildings, which they say tends to make renewal complicated and expensive. In one case a group reports 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 suggests that operating in historic churches makes for dual problems of listed building rules and the general planning laws. A different group says somewhat more positively that:

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

4.3.7. A few stakeholders report that their faith community have sufficient in-house expertise to work their way through the system successfully. Others say they have been on a learning curve and have increased their capacity in planning, architecture and design over the course of a long-term planning/building application. In one example, the faith community says it 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 says 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. They report that “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].*

4.3.8. Others say that both lack of expertise and changing legislation cause difficulties for them:

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

4.3.9. A number of stakeholders say that the problem of lack of expertise is compounded by the cost of hiring these skills in and this is felt to have had a negative effect on some faith groups’ chances of realising their building aspirations. One group say they had been subject to stricter controls than their neighbours appear to have been in terms of building heights and other restrictions. The planning system is 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 stakeholders saying they think there is a lack of ‘faith literacy’, and less support than could have been shown by planning authorities.

*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.*

4.3.10. The overall planning process therefore brought up a number of issues. Stakeholders say that planning staff are less supportive than they could be 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 they say that this was by no means uniform. One says that their council “disappeared from

view" once their worship space was developed. Another community says 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 they say helped identify external regeneration funds. They note that they have developed what appears to be akin to a partnership working arrangement by the end of the process.

4.3.11. All of those interviewed say they are happy to share worship space resources across boroughs. Many say they have large spatial catchments and draw worshippers from many parts of London. All agree that they subscribe strongly to the principle of inclusivity - that worship space should be open to all. However, a number point to certain caveats in the sense that they say they want their own dedicated space. We found that there are worship space expansion plans or aspirations among almost all the communities interviewed. Some communities say they want to expand or refit their current worship and related spaces. Our conclusion in this area is that for Pentecostal churches (and to an extent some other communities such as Muslim faith groups) these issues appear particularly pressing; 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/worship communities.

## 4.4. Worship space growth issues

4.4.1. Following on from the points made above, almost all stakeholders report that their faith community is growing rather than declining, but from what they say it appears that the speed, scale and spatial location of growth varies widely. Some communities suggest they could extend their existing premises and "offer satellite services as an option". Stakeholder comments from the more rapidly expanding communities such as Pentecostal and Evangelical churches, Muslims and possibly Hindus, suggest that the problems noted in the last section are sharpening. One faith group explains "we now have three services on Sunday. We cannot consider a 4<sup>th</sup> service as the neighbourhood will be choked on Sundays". As noted earlier, 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. A Muslim faith community reports that:

*We are growing fast! Growth has brought 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.*

4.4.2. While some stakeholders from smaller faith communities say that they would be able to keep doing things like hiring halls, they report that this is not the optimal solution for them. Stakeholders representing some larger faith communities say there is a more serious level of unmet growth needs for places of worship. While some

say they have plans to develop new places or worship or expand existing space, a number of these note that they are 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. Stakeholders say that the problem of insufficient space and inadequate options for addressing that problem is a significant issue for both Pentecostal/Charismatic churches and for Muslim faith communities. As one stakeholder explains, 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.*

4.4.3. An initial conclusion reported by stakeholders is that the Pentecostal and Evangelical churches (and others including Muslim faith communities) need more support. One stakeholder suggests that this could be related to thinking about worship space needs when building big new community facilities like conference, sporting and cultural venues. Other stakeholders suggest that 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.

## 4.5. Potential solutions identified by stakeholders

### Changing the planning system

4.5.1. There is significant support given to the idea of changing the planning system use classes so that worship space can more successfully be located in areas now zoned for employment. One interviewee says 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 treat it as space being taken out of employment land. So councils end up fighting to retain empty property that is no use to anyone.*

4.5.2. In this stakeholders' view, the change in approach would focus on strategic employment locations where they consider there are excess land and building holdings that could be released for use as worship space. The stakeholder proposes that in their area:

*the council give free D1 licenses for religious/community based uses and they are given quicker to reduce the chance of losing the property in question.*

4.5.3. At a planning policy level, it is proposed by one stakeholder that there be a “clear policy regarding the place of worship for faith groups, especially Black Minority churches”. A questionnaire respondent suggests that:

*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.*

4.5.4. Another respondent argues that:

*the council/GLA/Central Government should release land, properties for churches to buy, rent or build.*

4.5.5. The idea of developing London wide Supplementary Planning Guidance, to better support worship space needs, is suggested by a stakeholder:

*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

4.5.6. A considerable proportion of stakeholders consulted say that they support the idea of using redundant space for worship. They say that the opportunities in this area are constrained by limited supply of suitable buildings, and redundant churches for example will only suit smaller churches of up to 750 people. It is suggested by one stakeholder that this is especially suitable for “emerging/new Christian organisations, because they share similar goals”. Stakeholders say that using redundant space is a strategy that has 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.*

4.5.7. Some stakeholders say they have experienced barriers, however, such as insufficient funds to bring their reuse plans to fruition. A number of stakeholders argue that empty industrial buildings should be released for use as worship space if they were not used for a considerable period. One says that “we would like redundant industrial sites or reuse of redundant churches”. It was pointed out by another stakeholder that

*Warehouses on industrial estates solves any nuisance problems with neighbours and at the weekend may act as a deterrent to would- be burglars and vandals as the place would be occupied. It would solve car parking as well and many areas have local bus services to the estates.*

4.5.8. Another stakeholder suggests that there should be:

*Release of industrial units and warehouse that are unoccupied for up to a year, to be used for places of worship [and] release of borough community halls for use at evenings and weekends as places of worship and at discounted rates to religious organisations.*

4.5.9. One stakeholder says they like the idea of turning “eyesores” in east London to worship spaces as part of the post Olympics legacy:

*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.*

### **Increasing support from councils and government**

4.5.10. An initial conclusion made by interviewees is that faith communities need more support in relation to consideration of their worship space needs. They say that this could be related to thinking about their worship space needs when building big new community facilities like conference, sporting and cultural venues. They suggest that 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. These stakeholder views were supported by stakeholders attending the workshop, who say that “planning officers need to be relaxed in their approach to place of worship applications”.

### **Shared and multi-faith space**

4.5.11. A conclusion from interviewees is that shared space - possibly along 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. They point out that some communities have developed detailed guidance in this area. The Church of England, for example, alerted us to both legislation in this area (Sharing of Church Buildings Act 1969) and guidelines on sharing church buildings, The Sharing of Church Buildings in the Multi-Cultural City, produced by The Churches Together in England (2001). While the responses above suggest that larger communities have shown themselves to be willing to share space with smaller emergent groups to a considerable extent, stakeholders say that a normal part a faith community’s growth is its desire to have its own worship space. The suitability of multi faith spaces was also tied to stakeholders views (noted above) about the current size and expectations around expansion of different faith communities in particular areas.

4.5.12. Stakeholders attending the workshop say they agree that sharing space should be considered but not be assumed to suit everyone:

*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?*

4.5.13. One questionnaire respondent suggests:

*A shared use arrangement in which a school could be purchased so a church uses it in the evenings and weekends and school during the day.*

4.5.14. Another stakeholder says that:

*Joint development to establish shared use with office space.*

### **Partnership working**

4.5.15. A number of interviewees say that partnership working between faith communities, local authorities and central government is likely to be a fruitful area. However, they say that both local authorities and central government need to demonstrate more practical commitment to this idea in future. Some faith communities, for example the Church of England, explain that they have developed detailed reports in this area such as *Building Faith in our Future* (2004) that suggests solutions in regard to areas including partnership working. Equally, closer engagement with the GLA is said by some stakeholders to be important, to pursue worship space needs and make sure policy and practice fit together better. Thus,

*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.*

4.5.16. Similar solutions were suggested by stakeholders participating in the stakeholder workshop. The example of Camden was cited by one stakeholder as it "has a faith officer and a faith partnership". Equally it was proposed by a stakeholder that "greater use of signposting and networking between faith groups, planners, landowners and developers" would be useful. Overall this was about "raising the agenda of places of worship higher, to match employment and housing".

### **Recognising faith communities' role - training in faith literacy**

4.5.17. A considerable number of stakeholders interviewed, attending the workshop or who filled in questionnaires say that a part of the solution is about better understanding of faith communities' roles in society. One stakeholder argues that traditional and emerging faith groups should be seen as equal in importance and overall:

*The role of faith groups in modern day Britain should be recognised and efforts geared to celebrate their contributions to society, especially social/community cohesion, Every Child Matters, Refugees, Youth and Empowerment.*

4.5.18. Another stakeholder makes the point that there is a need for

*Upgrading the importance of faith (especially those that offer community services/activities) in making planning decisions. Whilst the benefits of businesses are often measurable, the benefits of faith organisations are not necessarily and immediately quantifiable in monetary terms but nonetheless they make significant contributions to the community.*

4.5.19. Stakeholders tied this to what they say is a need for action on increasing 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 by a stakeholder 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 said by some stakeholders 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.

4.5.20. Workshop participants agreed that faith and planning literacy are necessary:

*Faith literacy and planning literacy - cooperation on both sides is important to move forward.*

4.5.21. Other stakeholders meanwhile say that:

*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.*

4.5.22. One stakeholder says that such knowledge might best be encapsulated in a government circular on faith groups.

### **Improved financing techniques**

4.5.23. Participants attending the stakeholders' workshop came up with a number of financing ideas including developing a tariff for community infrastructure in new developments (following the example of Milton Keynes) saying that:

*This relies on the establishment of an effective forum for deciding how to allocate the funding or land made available.*

4.5.24. It was also proposed by a stakeholder that the Mayor could require 10-20% of space for faith uses (Section 106 or other technique) in new developments of a certain scale, saying:



*Developers understand their developments will have an impact on services. They could ring-fence resources for places of worship.*

4.5.25. It was noted by another stakeholder that this isn't the only answer to site provision:

*Barking and Dagenham is an example where money for places of worship is not coming from Section 106 agreements but sites are being provided.*

4.5.26. It is suggested by a stakeholder that there is a role for central government:

*Central Government needs to get more involved in this issue as this is a significant problem at the national scale, not just London.*

4.5.27. Thus, stakeholders say what is needed is:

*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.*

#### **More sensible policy on employment land**

4.5.28. Stakeholders suggest that policy on releasing employment land could make explicit that it is in part seeking to meet the needs of faith communities. Thus:

*Land in council ownership should be acknowledged as a source of land for community needs, not just for the Council's needs.*

4.5.29. Stakeholders argue that they should be kept in touch with vacant land that might become available. Moreover they say:

*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.*

4.5.30. One questionnaire respondent representing a faith group links policy on employment land directly to planning changes they say should be made London wide:

*We would appreciate the Mayor allowing excess properties within employment areas that have been vacant for more than 12 months to be used as a place of worship by setting up a supplementary planning guidance within the London Boroughs and if possible for the Mayor to request that each borough consider the above within their local frameworks.*

## Better urban design and master planning

4.5.31. Some stakeholders suggest that there should be a more plan led, policy approach to worship space provision that would they say remove uncertainties. Two stakeholders argue along these lines that:

*Core strategy priorities provide the opportunity at borough level to look at all these issues [and] you must have strong policy or planning officers will work on their own preferences and prejudices.*

4.5.32. As one stakeholder notes in a similar vein that:

*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.*

4.5.33. Another stakeholder suggestion is that 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. Various stakeholders note the need to locate faith space near the underground and over ground train services and bus transport. In such cases, it is argued by stakeholders that 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. Likewise, it is suggested that:

*The greenbelt 'scrappy bits' should have community uses allowed although this was deleted from PPG2 in 1995.*

4.5.34. Stakeholders say that master planning approaches offer positive potential:

*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.*

4.5.35. Equally, one stakeholder says that:

*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.*

## Improved consultation, and work with potential objectors

4.5.36. The stakeholder workshop participants suggest a considerable number of ideas they say will improve consultation between planning authorities and faith communities. One stakeholder points out that one-off consultations often fail. Typical comments include:

*You need ongoing events.*

*Long consultations are needed so that contacts, trust and information can build over time.*

4.5.37. Stakeholders argue that it is important that planners go to groups rather than expecting them to come to the council:

*There is the possibility of going the other way – planners attending forums organised by, rather than for, hard-to-reach groups.*

*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.*

4.5.38. Consultation at the right stage is also deemed important by stakeholders who say that it should occur not only between councils and faith communities but between communities and potential objectors to allay fears about new developments:

*Faith groups should do more pre-application engagement with residents i.e. set up green travel plans.*

4.5.39. One stakeholder group say that they:

*Do consultation with local communities before planning applications by producing a brochure. We invite local people to our halls and pre-empt residents associations.*

4.5.40. Stakeholders say that it is important to connect with objectors:

*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.*

### **Improving the planning skills of faith communities**

4.5.41. The issue of planning expertise was raised by stakeholder workshop participants who ask in this regard:

*Where a faith group doesn't have a strong expertise network, who should be responsible?*

4.5.42. Stakeholders suggest a possible solution is through experts giving pro bono advice:

*Where this is just a bunch of volunteers they could get pro bono advice.*

4.5.43. External support such as that provided by Planning Aid for London is cited as another solution:

*Planning Aid? They have just been awarded £50 million". "The Planning Pack from Planning Aid for London is good.*

# 5. Conclusions and recommendations

## 5.1. About the conclusions and recommendations

5.1.1. In this final section of the report we set out our conclusions and recommendations to the Mayor on worship space needs in response to the evidence collected and summarised above from planning and faith community stakeholders about worship space needs in London.

5.1.2. Our overarching conclusion is that the evidence demonstrates clearly many faith groups are having substantial difficulties in realising their worship space aspirations or fulfilling their wider social programmes, in part due to constraints related to the operation of the planning system. Both 'sides' of the research: the faith community engagement results, and the questionnaire survey, planning interviews and case studies, have 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. Moreover, the sense that there is a lack of 'faith literacy' amongst many planning authorities is common among faith communities consulted.

5.1.3. In order that the planning system deals better with worship space needs in London in future, we conclude that action is needed on a number of fronts, some of which can be pursued by the Mayor and some of which may suggest actions by faith communities themselves. We therefore include recommendations in relation to planning policy and practice and also in the range of other 'process' areas that are listed below. We deal first with planning policy recommendations then move on to other related recommendations.

5.1.4. This Final Report should be read in conjunction with the accompanying Evidence Report, which provides greater detail in a range of areas of evidence on which the following recommendations are based.

5.1.5. The conclusions are listed in summary below then the analysis and justification for them is provided in the rest of the section. While all the recommendations reflect our analysis and conclusions from the various research streams, a few are primarily in response to stakeholder proposals we believe are justified by our independent research. In these cases we note that the recommendation reflects a stakeholder proposal.

## 5.2. Potential solutions - planning policy recommendations

5.2.1. 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, consultation and 'faith literacy'.

### London Plan policy and guidance

5.2.2. The research revealed that, in the absence of dedicated planning policies for places of worship, faith groups are competing for space with other potential users of 'non-residential institutions' (D1 Use Class). Unlike policies relating to major land uses, such as housing and retail, policies on community uses (including places of worship) are not generally based on an assessment of need. The result is that the planning system is largely reactive and unable to respond effectively and consistently to the needs of faith groups. This was highlighted by the number of planning appeal decisions that overturn decisions by London Boroughs.

**5.2.3. We recommend that a further alteration of the London Plan should include specific policies on places of worship, addressing the need for places of worship (taking account of their wider social and economic roles) and supporting the retention of existing places of worship and appropriate proposals for new or expanded places of worship.**

**5.2.4. We recommend that the policies should be accompanied by guidance (SPG or another form of guidance), which addresses *how* the Boroughs should undertake a needs assessment and the policy and development control mechanisms that can be used to meet identified needs.**

**5.2.5. We recommend that the policy framework is based on an understanding of two key variables: the different types of places of worship that are needed; and the range of appropriate planning policy and other responses that can be used to respond to these needs.**

5.2.6. Broadly, and cutting across all faith communities, there appears to be demand for four main types of places of worship, with the differences mainly relating to scale. These are:

1. Home based worship, involving small congregations of people meeting informally in one another's houses;
2. Local places of worship, serving an established local population. The majority of this type are the 'inherited' churches, but also places of worship for other faith groups that meet local needs, including weddings and funerals;

3. Local places of worship, serving an emerging or new local population. This type covers the development of type 2, above, in new development areas (where existing provision is inadequate), and new types of places of worship that are required to meet the needs of a changing population in an established area; and
4. Places of worship serving a wider sub-regional or London wide population as a centre for a particular faith community in London (this category could also cover a London multi faith centre).

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

5.2.8. The research revealed that the majority of current and likely future needs relate to types 3 and 4. The problem with type 3 is that there is no consistent approach to assessing needs in development plans and, as a result, the needs are generally not being met in new development areas or areas with a rapidly changing population. The result is that people are travelling further afield to find alternative places of worship and the opportunity for community cohesion is reduced.

5.2.9. The need for type 4 places of worship is possibly a consequence of the problems of type 3 places of worship, but there is a general trend across most faith groups for larger, sub-regional, or 'mega' places of worship which draw worshippers from across London and beyond.

5.2.10. **We recommend that the London Plan guidance on needs assessment should focus on type 3 and type 4 places of worship. Type 3 places of worship might lend themselves to a 'standards' based approach, whereby an agreed amount of land is set aside for different population levels (e.g. 0.5 hectares of land per 3000 population).**

5.2.11. In terms of planning policy and development control mechanisms that can be used to respond to these needs, we recommend that the London Plan and accompanying guidance should address the following.

#### **More appropriate use of D1 Use Class and planning conditions**

5.2.12. The D1 Use Class (Non Residential Institutions) covers a range of community uses, including places of worship. The Use Class affords places of worship flexibility in their use of the building, for example to provide crèche and nursery facilities, running education and training course and putting on exhibitions.

5.2.13. However, the evidence indicates that number of D1 Use buildings is diminishing, thereby reducing the potential stock of places of worship. We therefore recommend that policy should seek to secure no net loss of land zoned for D1 Use.

5.2.14. The research found many cases of the use of planning conditions to prevent the use of D1 buildings for worship. In some instances it is unclear why such a condition is imposed, as the adverse impacts of the use of a building could be overcome by specific conditions that would address objectors' concerns (such as those relating to noise, hours of operation, traffic generation and parking).

5.2.15. **To address this issue, we recommend that London Plan guidance should outline the key planning issues associated with places of worship and how planning conditions can be used to address them.** This should include, for example: the use of sound proofing to mitigate noise impacts; restricted hours of operation; adoption of green travel plans to address traffic generation; and provision of on-site or off-site parking where possible.

### More flexible policies relating to employment areas

5.2.16. The research found that, in seeking new places of worship, faith groups have resorted to employment areas in inner and outer London. This has resulted in a large number of unauthorised activities and extensive enforcement action. More often than not, planning applications for places of worship in such areas have been refused and many dismissed at appeal.

5.2.17. The key policy issues at stake are the retention of land for employment / storage uses and the lack of suitable transport links. However, these clearly need to be balanced with the needs of faith communities. The fact that one third of appeals against refusal of planning permission for a place of worship in an employment area were upheld is an indication that there is scope for a different approach. Interestingly, the Inspectors took account both of the number of jobs that places of worship provide and the small marginal impact on the amount of employment land that would result from upholding the appeals.

5.2.18. **We recommend that policies on employment areas do not rule out the possibility of places of worship, provided that other material planning considerations are met. The onus should be placed on the planning authority to weigh up the need for employment land and for places of worship, rather than expecting faith groups to do this on a case-by-case basis.**

### Using planning enforcement powers sensitively

5.2.19. **We recommend that, where unauthorised uses exist, the Mayor should encourage Boroughs to make sensitive use of enforcement powers.** This should involve giving careful consideration to retrospective planning applications, taking account of the recommendations made above, and where no retrospective application is made, allowing a generous amount of time for faith groups to cease operations in order that they have sufficient time to find alternative premises.

### Realising the potential of London Plan Opportunity Areas

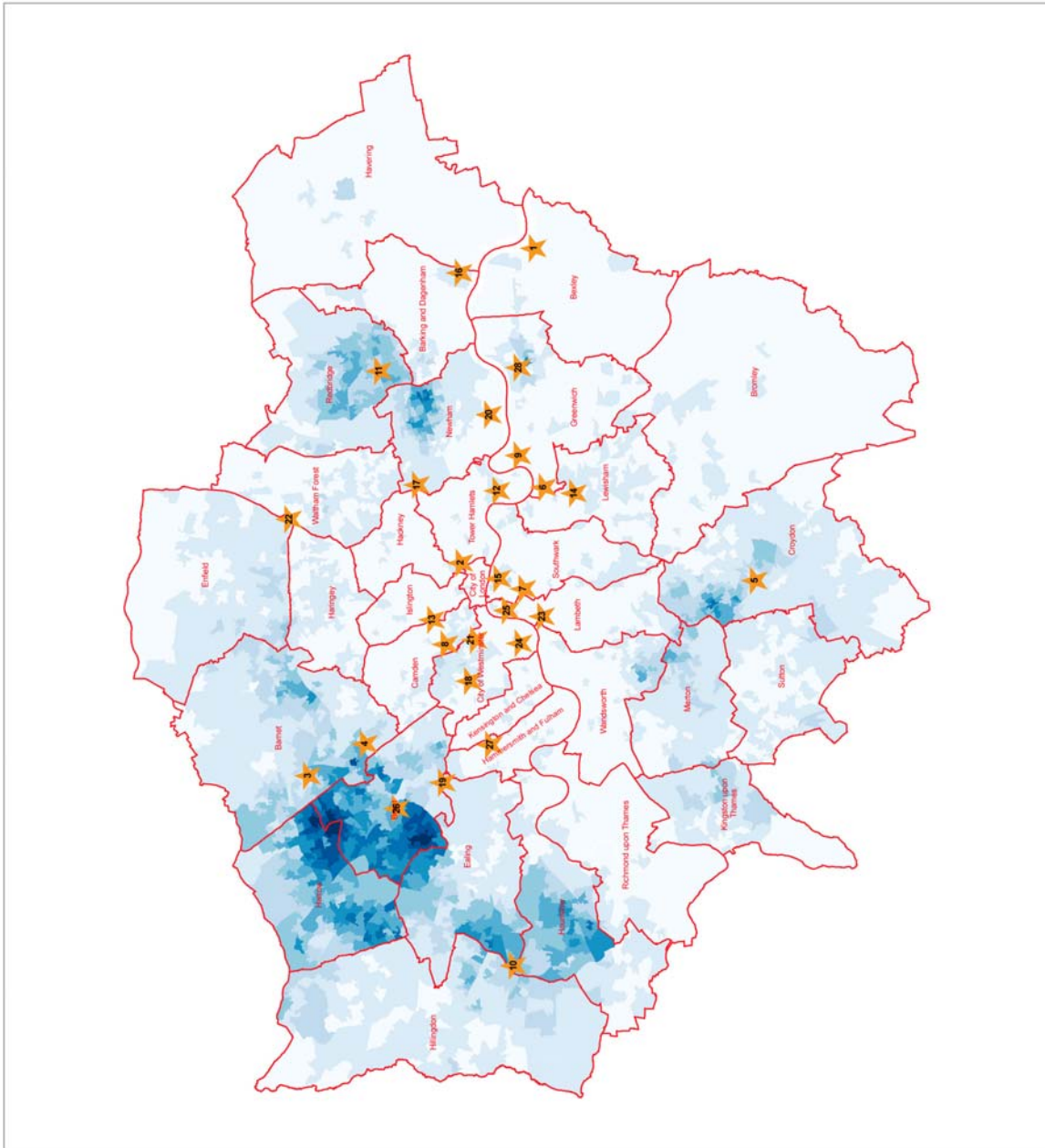
5.2.20. The needs of faith communities need to be addressed at an early stage of planning areas of significant change. Without this, their needs are unlikely to be met



through the existing supply of D1 uses. **We recommend that Design Briefs and Master Plans for the Opportunity Areas respond positively to identified needs by providing land/space for faith communities.** The proposed Community Infrastructure Levy and Section 106 Agreements could provide the funding mechanisms for new places of worship. By way of example, **Figure 5.1** provides a spatial analysis of the Opportunity Areas in relation to London's Hindu population.

5.2.21. **Table 7** seeks to draw links between the four main types of places of worship and the planning responses that may be applicable. It also identifies potential locations and approximate site size. This is intended to provide an initial framework for developing an overall planning response.

5.2.22. With regard to these planning responses, all other material considerations should be taken into account, including the impact on living and working conditions of neighbouring occupiers; and any impact on the road network and public transport in line with the wider sustainability objectives in the London Plan.



**Faith Communities**  
Figure 5.1: Opportunity Areas in Relation to the Percentage of Population who Answered Hindu in the 2001 Census

**Key**

- London borough boundaries
- ★ Opportunity Areas

Percentage of population who answered Hindu (Census 2001)

|               |
|---------------|
| 0.00 - 2.00   |
| 2.01 - 6.00   |
| 6.01 - 10.00  |
| 10.01 - 15.00 |
| 15.01 - 20.00 |
| 20.01 - 25.00 |
| 25.01 - 35.00 |
| 35.01 - 45.00 |
| 45.01 - 55.00 |



Source: ONS: Census 2001



Date: 15/05/2008  
Revision: A

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**Table 7:** Types of place of worship, associated issues and recommended planning changes

|    | <b>Type of Place of Worship</b>  | <b>Suitable locations</b>  | <b>Indicative Site size</b> | <b>Planning response</b>  | <b>Parking requirement</b> |
|----|--|--|-----------------------------|---|----------------------------|
| 1. | Home based worship   | Private residences   | N/A                         | Enforcement action only required if complaints demonstrate that a material change of use or development has occurred, or adverse effects cannot be addressed through statutory nuisance legislation | Low                        |
| 2. | Local place of worship, serving an established local population                    | Residential areas and town centres, close to public transport nodes              | 0.25ha                      | D1 Use Class and planning conditions  | Low                        |
| 3. | Local place of worship, serving an emerging or new local population                | To be determined by developers / planners in consultation with faith communities | 0.25-0.5ha                  | D1 Use Class and planning conditions<br><br>Policies relating to employment areas<br><br>Opportunity Areas masterplanning   | Low                        |
| 4. | Places of worship serving a wider sub-regional, regional or London wide population | Fringes of employment areas, close to public transport node                      | 0.5ha                       | Policies relating to employment areas<br><br>Opportunity Areas masterplanning   | High                       |

### Addressing design issues appropriately

5.2.23. Places of worship feature strongly amongst London's landmark buildings. Iconic design of places of worship is an important part of the tradition of most faith groups. Consultation with faith groups as part of this research, however, revealed that the pressing need of some faith groups is simply a 'space for worship', rather than necessarily an iconic place of worship. This is evidenced by the fact that many groups operate successfully from industrial buildings in employment areas. On the other hand, the London Plan advocates high quality and appropriate design in all new developments.

5.2.24. **We recommend that the Mayor should undertake further research into the design issues associated with places of worship, taking account of the typology of places of worship in Table 7, above, the views of faith communities, and specific access requirements for older and/or disabled people.**

### Further research into planning enforcement

5.2.25. A limitation of the data on planning applications is that they do not take account of unauthorised places of worship (i.e. those without planning permission for D1 Use). Anecdotal information provided by some Boroughs on the number of enforcement notices issued suggests that the scale of the unauthorised use problem is very significant.

5.2.26. In order to provide a more robust evidence base, **we recommend that the Mayor should undertake supplementary research into unauthorised places of worship in London.**

5.2.27. Flowing on from the planning policy recommendations, we conclude from the evidence that there is also potential for a number of other 'spatial' solutions. These are outlined below.

### A flagship multi-faith space for London

5.2.28. Although a clear conclusion is that for many faith communities their own dedicated worship space is a non-negotiable requirement, we also learnt that there is significant support for developing at least one flagship multi-faith worship and cultural space in London. Our conclusion is that such a space would be a valuable way to make both a symbolic and practical demonstration of commitment to multi-faith worship. **We therefore recommend that the Mayor should consider the need for a flagship multi-faith worship, educational and cultural space in London.**

### Shared space opportunities

5.2.29. In the context of scarcity of land and buildings in London suitable for worship space use, there are potential shared space opportunities that are yet to be

fully realised across London. In particular faith communities could take advantage of spare capacity in land uses already in existence for creating worship spaces, at least in the short to medium term as a transitional stage, while they work towards securing their own bespoke spaces. **We recommend that the Mayor works with the 33 London Planning Authorities, faith stakeholders and relevant institutions such as schools, property owners and others with interests in the process to consider the opportunities for shared use of space with schools, offices, community halls and other identified land use types not currently being fully utilised.**

### 5.3. Potential solutions - 'process' recommendations

5.3.1. As well as the above recommendations on the planning side, we are mindful of the many other good ideas that stakeholders proposed throughout the project that relate to what we are describing as 'process' issues. While a good proportion of these are reflected in the planning related recommendations above there are a range of others that we conclude should be considered by the Mayor, based on the evidence from the project set out here and in the accompanying Evidence Report.

5.3.2. We have concluded from the evidence collected that, while longer established and better resourced faith communities are often able to 'market' themselves to a considerable degree through written documents, websites and communications staff, it is harder for smaller and/or newer faith communities to describe their 'offer' to those less well informed about them. The recommendations in this subsection are aimed in various ways at helping make clearer the positive value faith communities bring to London as well as providing practical 'process' support. We conclude for instance that faith communities' arguments in relation to the need for increased support from all levels of government, greater partnership working with London Boroughs and the Mayor, improved planning skills (on both sides), the need for more better knowledge of the needs of faith communities among planning staff and councillors, and the development of better consultative and engagement techniques both within boroughs and among faith groups themselves, would all have positive effects if pursued. We therefore include recommendations in all these areas.

5.3.3. Few of these actions can be undertaken by the Mayor acting alone, and we have suggested that the Mayor may wish to take a role in partnering with faith communities to pursue some of these recommendations, while they may need to work with central government in regard to others.

#### Increased support from London Boroughs, the Mayor and central government

5.3.4. Increased support from councils, the Mayor and central government is necessary to underpin changing and growing worship space needs in London. Our conclusion from the evidence is that a number of proposed solutions offer useful opportunities to improve the way that the Mayor and London Boroughs support faith

communities in relation to responding to worship space needs. **We recommend that the Mayor should consider the following:**

- **Working with London Boroughs and through the Mayor's own master planning processes (of which more below), to ensure worship space needs are taken into account when large-scale new community facilities like conference, sporting and cultural venues are being designed and planned in London;**
- **Working with London Boroughs to ensure they have in place better 'process' arrangements including providing good levels of pre-application advice to help faith communities in negotiating their way through the planning and heritage systems;**
- **Working with London Boroughs to ensure faith communities receive assistance in identifying and securing external funding sources to help meet their worship space expansion aspirations;**
- **Working with London Boroughs to consider forming independent faith advisory groups at each Borough level;**
- **Working with London Boroughs to employ faith officers at Borough level who would co-ordinate many of these tasks.**

### **Partnership working**

5.3.5. We suggest special attention should be given to working with London Boroughs to develop partnership-working arrangements between Boroughs, faith communities and wider communities (including potential objectors) to identify and secure appropriate worship spaces in both an urban regeneration and new development context in London. As was explained in the Section 4 and highlighted by the case studies, there are best practice examples among the 33 London Planning Authorities, a small number of which already have faith officers and faith partnerships. **We recommend that the Mayor considers how best to support more developed partnership working between faith groups, planners, landowners and developers.**

### **Recognising faith communities' role - training in faith literacy**

5.3.6. To support better partnership working many stakeholders told us that they saw a need for improved understanding about faith communities' roles in society. In practical terms faith communities suggested that there was a need for action on faith literacy training for both local and central government officials and elected members in London to increase their understanding about both faith and its links to cultural diversity. As noted in Section 4, a related area of education was thought to be needed by planners so they could help make the planning system more user-friendly.

5.3.7. **We recommend that the Mayor should consider how to improve understanding about faith communities' roles in society.** One way to increase communication and awareness-raising would be to recognise the important role played by Planning Aid for London in this area. The Mayor may wish to explore partnership opportunities with Planning Aid to further this faith literacy, communication and 'user-friendliness' agenda.

#### **Improving the planning skills of faith communities**

5.3.8. Just as a need is recognised to improve faith literacy among those making decisions about worship space provision, faith communities themselves recognise they often need to upgrade their planning and development skills and expertise. The issue of planning expertise was raised repeatedly by stakeholders, and the expense of hiring in expertise is a formidable barrier in making planning applications and related development activities. We conclude that the previously mentioned partnership working proposals with London boroughs should include capacity building assistance to faith communities by borough staff to assist in developing their understanding of the planning system. External support such as that provided by Planning Aid for London could again be an important part of the solution.

5.3.9. **We recommend that the Mayor discusses with faith communities and interfaith forums how faith communities can be supported to improve their planning skills.** Planning Aid for London could continue to have a key role in this, and the Mayor may wish to discuss with PAL how they could best ensure that faith communities are aware of PAL's services and can access these to improve their planning and consultation skills. Equally the Mayor may wish to discuss with London Boroughs how they can engage faith communities in capacity building action at borough level in relation to communities' planning knowledge and skills.

#### **Improved consultation, and work with potential objectors**

5.3.10. Stakeholders from both faith communities and London Boroughs proposed a number of valuable ideas for improved consultation between planning authorities and faith communities, and between faith communities and potential objectors in order to minimise objections which can halt worship space developments. Many of these are in line with best practice in engagement process. Stakeholders made particular reference to the need for consultation to start early in the process of identifying potential worship spaces, to be ongoing and for the 33 London Planning Authorities to go out to consult faith groups rather than expecting them to come to their council. Stakeholders rightly argued that early and ongoing consultation was important, not only between councils and faith communities but between faith communities and potential objectors, to allay fears about new developments, to address concerns, and "to get objectors on side".



5.3.11. **We recommend that the Mayor’s guidance on worship space needs should encompass specific guidance on how to carry out successful ongoing consultation and engagement between boroughs and faith communities, and between faith communities and potential objectors.** Again, Planning Aid for London could have a valuable role to play in training both borough staff and faith communities in the consultation and engagement skills they will need in a complex development process.