

**London Borough of Ealing  
Development (or Core) Strategy  
Submission Development Plan Document – Independent  
Examination**

**Matter 12:**            **Phasing, Delivery and Monitoring**

**Issue 4:**            **Whether the mechanisms in the CS for implementation and monitoring are sufficiently clear, detailed, and meet national policy requirements.**

**Rep No.:**            **116**

**Submission by:**    **Andrew Bennett on behalf of Jehovah’s Witnesses**

**Agent:**             **Robert Cramp**

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**1.0 SUMMARY**

1.1 The submitted core strategy document, in so far as it provides guidance relating to places of worship, is not sufficiently clear and does not meet national policy requirements.

**2.0 GOVERNMENT GUIDANCE**

2.1 **PPS1 – Delivering Sustainable Delivery** – Paragraph 14 of PPS1, under the subheading ‘Social Cohesion and Inclusion’ states that: “...*The Government is committed to developing strong, vibrant and sustainable communities and to promoting community cohesion in both urban and rural areas. This means meeting the diverse needs of all people in existing and future communities, promoting personal well-being, social cohesion and inclusion and creating equal opportunity for all citizens*”.

Paragraph 16 goes on, in part, to state as follows “...*Plan policies should:... take into account the needs of all the community, including particular requirements relating to... religion*”.

Paragraph 26 further encourages local planning authorities when preparing development plans to: “...*Recognise the needs and broader interests of the community to secure a better quality of life for the community as a whole.*”

2.2 **Diversity and Equality in Planning: A Good Practice Guide** – Key Message 1 states that: “...*Planning is about making development more sustainable. This includes ensuring that the use and development of land takes account of the needs of ... the people of the many different cultures*

*and faiths...Therefore, the culture of planning should recognise, respect, value and harness difference."*

Key Message 2 makes the point that: *"...Practices that do not address the different needs of a diverse society are likely to amount to discrimination, even if that was not their intent"*.

### **3.0 COMMENTS**

- 3.1 Jehovah's Witnesses have been active in the Borough for many decades and there is an ongoing need for new facilities to meet the needs of growing congregations as no doubt exists also for other religious groups.
- 3.2 Government Guidance clearly recognizes the importance of worship (or religion) as an integral part of a sustainable community; and an important issue that should be taken into consideration by local planning authorities when planning for sustainable communities.
- 3.3 Under the provisions of the Ealing Council Unitary Development Plan (UDP), the council appears to have previously recognized this need. Chapter 8 of the UDP, included places of worship among the wide range of community facilities that not only allow for *"the enjoyment of residents, workers and visitors in the borough, they also help raise the quality of life and promote healthy living"*. The council was therefore committed to seeking to *"facilitate the supply of appropriate premises across the borough"*. That commitment was reflected in specific requirements relating to the appropriate provision of new places of worship; and provisions relating to the protection of existing facilities from redevelopment for other purposes. A Supplementary Planning Document (SDP) was also adopted to provide specific guidance relating to the provision of places of worship.
- 3.4 For reasons not adequately explained by council officers, the submitted core strategy, contains no mention at all of places of worship. Chapter 6 – Ensuring Sustainable Delivery, states in part as follows *"...To create sustainable communities, providing housing and employment opportunities alone is not sufficient. There is a need to provide the necessary supporting 'infrastructure' of transport, schools, open space, community, health and leisure services etc to support the local population and those who visit or work in the borough"*. No specific mention is made of places of worship.
- 3.5 Map 9, which identifies 'Community Facilities in Ealing', specifically includes secondary schools, primary schools, special schools, hospitals, GP surgeries, sports and leisure centres, and libraries. Again, there is no reference to places of worship.
- 3.6 In response to our submission to the council regarding this apparent oversight, the council officer responded in the following terms: *"The*

*DMDPD contains policies relating to the protection of community facilities. We are not required to provide places of worship as part of LDF”.*

- 3.7 As the Inspector is aware, the term “community facility” is a generic term, which does not constitute a use class in itself. It is a wide ranging, yet undefined term, which covers a wide range of possible uses of both a commercial and public nature. It is a term that can, and often is, used to encapsulate a variety of facilities and services extending beyond even those uses falling within use classes D1 and D2 of the Use Classes Order.
- 3.8 The council officer in his response suggests that places of worship are adequately captures by the term “community facilities”. However this term is not specifically defined. Furthermore Map 9, which purports to identify “Community Facilities in Ealing” makes no reference to places of worship. It does however make reference to other uses, which are specifically mentioned by name elsewhere in the document and for which specific guidance and direction is also included.
- 3.9 Over the years there has been a growing trend towards the loss of land formerly used for Class D1 purposes in order to facilitate redevelopment for residential purposes. Furthermore, as a charitable organisation it is always difficult to compete in the market against private developers and commercial interests that can afford to pay speculative values for land above that of a community facility alone. As a consequence of the above trend the pool of land available for the provision of Class D1 uses, including places of worship, continues to diminish. Therefore unless specific provisions is made for both the provision of new facilities and the protection of those that already exist, the needs of the community for places of worship in suitable locations will not be met.
- 3.10 The absence of places of worship from Map 9 which purports to identify “Community Facilities in Ealing” might suggest that the council does not recognise places of worship as benefiting from the provisions of the Core Strategy relating to community facilities, including those provisions aimed at protecting existing facilities from redevelopment for other purposes.
- 3.11 We do of course appreciate that it is not possible for the council to specifically identify every potential land use encapsulated by the term ‘community facilities’. However, ‘places of worship’ are a common and integral feature of any urban environment and are perhaps more numerous than other types of ‘community facility’ (such as hospitals and libraries) which are specifically mentioned in the Core Strategy and for which specific provisions have been made.
- 3.12 We understand and appreciate that proposals for places of worship are often accompanied by a range of challenging issues, which are equally

difficult for both the council and applicant to address. However, the absence of clear planning guidance and direction is counterproductive and unacceptable.

- 3.13 Our request is simply that the Development (or Core) Strategy should:
- 1) acknowledge that places of worship are an integral part of a sustainable and vibrant community and as such should be specifically referred to in those sections of the document dealing with 'community facilities' and 'social infrastructure';
  - 2) protect existing facilities from pressure to redevelop for other purposes; and
  - 3) provide us with a policy basis to pursue the provision of new facilities in suitable locations as and when the need arrives. This request is entirely consistent with Government Guidance.

#### **4.0 CONCLUSION**

- 4.1 The inspector is respectfully requested to consider the above comments and conclude that the submitted Development (or Core) Strategy, insofar as it relates to places of worship, is **not effective** or sufficiently clear and detailed to meet the future needs of the community being planned for.
- 4.2 In failing to recognize and address the importance of places of worship as an integral part of a sustainable community the Development (or Core) Strategy **fails to meet national policy requirements**.