



# UNION4 PLANNING

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## Welbeck CP (Haven Road) Ltd

Units 1 and 2, Haven Banks, Exeter, EX2 8BY

Proposed change of use of premises from retail use (Class E) to a place of worship and ancillary functions (Class F1) for a temporary period of twelve months

## PLANNING STATEMENT

September 2023



UNION4  
PLANNING

## Document Control

**Project:** Haven Banks Temporary Church Use

**Client:** Welbeck CP (Haven Road) Ltd

**Job Number:** U0438

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## 1.0 Introduction

- 1.1 This Planning Statement has been prepared by Union4 Planning on behalf of Wellbeck CP (Haven Road Ltd ('the Applicant') in support of a full planning application for the temporary use of the existing premises by Rediscover Church under Use Class F1 (Learning and non-residential institution).
- 1.2 The application site comprises two vacant retail units within the Haven Banks Retail Park. The site is part of a wider area which is the subject of a current planning application for a comprehensive development to deliver a new mixed-use neighbourhood (Application Reference 22/1145/FUL). This submission seeks the temporary use of the existing buildings by the Rediscover Church prior to the delivery of the long term proposals for the site (a 'meanwhile use').
- 1.3 Welbeck CP (Haven Road) Ltd is a family owned, private property development and investment business. They are the Applicant and owner of the site, having acquired the freehold interest in 2021. They were contacted by the Church who are looking for additional premises within Exeter.
- 1.4 The Rediscovery Church has an existing permanent home on Northernhay Street in the heart of the city. As the congregation has grown, the Church has been looking to expand its capacity to provide a larger space for worship as well as a wider range of facilities and activities. The Church currently hires out venues within Exeter when it is hosting large events but has been actively looking for an additional permanent home for the last 8 years. However, the space requirements make it challenging to find an appropriate permanent new venue.
- 1.5 Typically warehouse buildings provide the necessary capacity; however, with the Council committed to increasing warehousing stock and the Church competing with warehouse occupiers, it continues to be a challenge to find a new premises.
- 1.6 For the Church, the priorities for a new space are:
  - 1) Sufficient floor space to house the expanding congregation and new services; and
  - 2) A suitable location:
    - i) near the city centre where it has been based for its 94-year history;
    - ii) an area where it is well-known to create publicity;
    - iii) an area with good public transport links.
- 1.7 The application premises provide an appropriate space in terms of capacity and location and would make a good temporary home for the Church as well as allowing the ongoing use of the existing buildings until the point at which the wider area will be redeveloped.
- 1.8 In addition to the use as a place of worship, the Church also undertakes important community activities and services, which they will continue to do from the Haven Banks site, including:

- Parent and toddler groups;
- Small café;
- Food distribution to families in need;
- Youth centre;
- Basic indoor sporting activities.

1.9 The use would therefore be a 'meanwhile use' for a period of 1 year from the date permission is granted, providing a much-needed temporary space for a long standing local religious institution.

1.10 The Church would retain its existing premises in the City Centre and with the exception of the offices and a 24/7 prayer centre, the majority of the services would decant into the proposed new temporary premises.

#### **Application Submission**

1.11 This planning application comprises the following documents:

- Application Form and Certificates;
- Site Location Plan (1:1250);
- Planning Drawings;
- Planning Statement;
- CIL Questionnaire Form.

1.12 The application also includes the following supporting documents:

- Noise Impact Assessment - prepared by PC Environmental;
- Transport Assessment - prepared by RGP;
- Travel Plan Statement - prepared by RGP;
- Flood Risk Assessment - prepared by Richard Jackson Engineering.

1.13 This Planning Statement provides a comprehensive overview of the proposals and includes an assessment of the proposed development against the relevant planning policies and guidance.

## 2.0 Site Description

### Application Site

- 2.1 The application site comprises units 1 and 2 of an existing 4-unit retail warehouse (units 3 and 4 being occupied by Ten Pin bowling). The application site has a gross internal area (GIA) of 4,635 sqm and consists of 2 vacant retail units (formerly The Range and Matalan). The site is accessed via Water Lane, with the wider car park providing 205 car spaces.
- 2.2 The building is a warehouse structure comprising a steel frame with part brick and part clad elevations, with glazing to the southwest corner under an insulated sheet steel. Unit 1, the former Range unit, has a floor area of 5,046 sqm (GIA) which includes a mezzanine floor. Unit 2, the former Matalan unit, has a floor area of 1,267 sqm (GIA) including mezzanine.
- 2.3 The site forms part of the wider area known as Haven Banks on the east side of Water Lane. The area was redeveloped in the 1980's to reflect largely the current form comprising a large retail warehouse unit known as the Haven Banks Retail Park.

**Figure 1: Site Location (boundary approximate)**

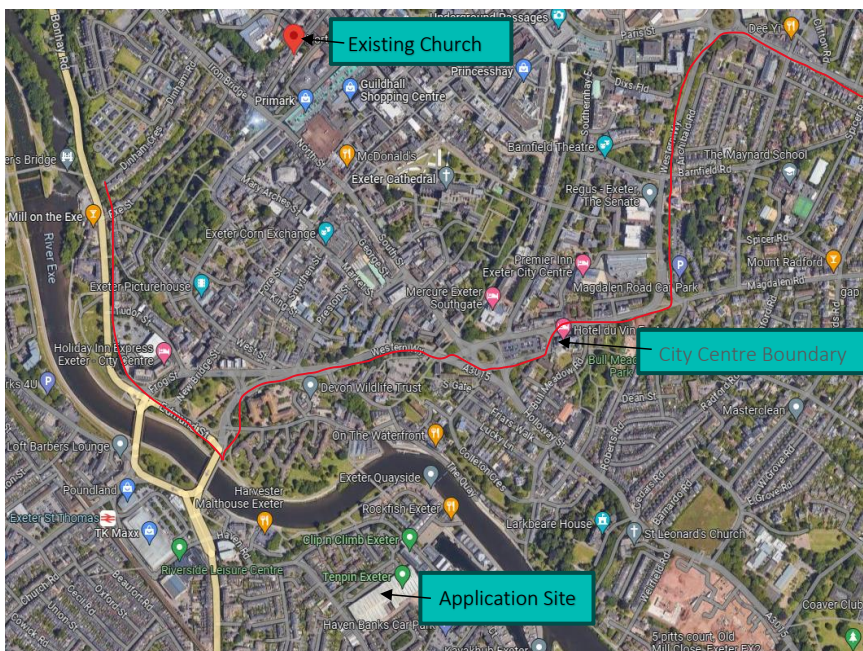


Source: Google Maps (August 2023); annotated by Union4 Planning

- 2.4 The building is directly adjoining a public pay and display car park which has capacity for 205 cars, with a maximum stay of up to 4 hours.
- 2.5 The adjoining bowling alley 'Tenpin' is open from 10am to 12am and provides a wide range of indoor activities including soft play, escape rooms, Lazer Tag, arcades, pool, karaoke, climbing wall and table tennis.

- 2.6 The site is within close proximity to Exeter St Thomas Railway Station, located approximately 600m to the northwest and served by Great Western Railway. There are bus stops directly adjacent to the site on Water Lane served by the Green Park & Ride bus. There are also routes via Exeter City buses at Riverside Leisure Centre, some 400m to the northwest of the site and a significant number of additional bus routes from Exeter St Thomas Railway Station.

**Figure 2: Site location- wider context**



Source: Google Maps (August 2023); annotated by Union4 Planning

### Surrounding Area

- 2.7 The surrounding area comprises a mix of residential and commercial uses. To the northwest and southeast are residential properties, with the nearest being those on Chandlers Walk to the southeast and Stream Court and Diamond Road to the northwest.
- 2.8 To the northeast is a mixed-use building comprising a climbing centre and café. Directly opposite the site on Water Lane are commercial/industrial units and neighbouring residential areas. The River Exe is approximately 130m to the north and east. Exeter Town Centre is located on the opposite side of the River Exe, approximately 600m to the north (as the crow flies).

### Transport Accessibility

- 2.9 Principal access to the Haven Banks area is provided from the A377 Alphington Street, which in turn forms a connecting route to Junction 31 of the M5 (via the A30) to the south of Exeter.
- 2.10 The site is within close proximity to Exeter St Thomas Railway Station, located approximately 600m to the northwest and served by Great Western Railway. There are bus stops directly adjacent to the site on Water Lane served by the Green Park & Ride bus. There are also routes via Exeter City buses at Riverside Leisure Centre, some 400m to the northwest of the site and a significant number of additional bus routes from Exeter St Thomas Railway Station.
- 2.11 There is a good provision of pedestrian infrastructure provided throughout the local area and the wider city centre. There are lit footways provided along both sides of Haven Road and Water Lane in the vicinity of the site, providing direct pedestrian links into the site from both points of access.

### Planning History

- 2.12 A planning application (reference 22/1145/FUL) was registered on 1 August 2022 for the following development description:
- "Comprehensive redevelopment to deliver a new, mixed use neighbourhood, comprising demolition of existing buildings and construction of four residential-led mixed-use buildings of 2 to 6 storeys, including retail, café/restaurant and flexible commercial units (Class E), residential (Class C3) and co-living (Sui Generis) accommodation, pedestrian square and public realm, amenity areas, landscaping, access, parking, servicing and associated works".*
- 2.13 Prior to this, there have been a number of planning applications relating to the use of the site and the existing units, details of which are set out in the table below.

Reference	Unit	Description	Decision
19/0434/FUL	1	Change of use from retail (A1 Use Class) to a Family Entertainment Centre including trampoline park, soft play, mini-golf and café, and storage and distribution warehouse (mixed D2/B8 Use Class), with flexibility to change back to a retail warehouse (A1 Use Class).	Withdrawn
17/0413/FUL	2	Change of use of retail warehouse (Use Class A1) to flexible use as either a gym (Use Class D2) or retail warehouse (Use Class A1) with a non-material amendment to condition e of pp. 03/84/1493 to account for the additional goods that can lawfully be sold from Unit 2 (appeal ref. T/APP/Y1110/X/03/1126223), mezzanine extension and installation of new entrance.	Granted 2 November 2017
03/0346/LED	2	Use for the retail sale to registered members of clothing, household goods and textiles, shoes, china, glassware and pottery, seasonal goods and	Refused 16 July 2003



		ancillary items. (Certificate of Lawfulness of Existing Use) under section 191 (1) (c) Town and Country Planning Act	
02/1795/FUL	2	Retention of retail warehouse use (application 03/84/1493 granted 19 March 1985)	Withdrawn 14 May 2003
99/0876/FUL	2	Retention of existing use to allow retail sale to registered members of clothing, household goods and textiles, shoes, china, glassware and pottery, seasonal goods and ancillary items.	Granted 5 September 2000
00/0207/LPD	1	Use of mezzanine floor for retail (Class A1) and cafe (Class A3) (Certificate of Lawfulness of Proposed Use)	Lawful 4 April 2000
97/0864/FUL	2	Variation of existing authorised use to allow (a) retail to registered members, of clothing, household goods and textiles, china/pottery and other ancillary goods (b) the sale of bulky/DIY goods	Refused 29 January 1998
97/0863/FUL	2	Variation of existing planning consent for unrestricted non-food retail use (Class A1)	Refused 29 January 1998
94/0724/FUL	1	Variation of condition (03/84/1493) to allow use of 1,800 sq ft (4.7%) floorspace for wholesale of shoes and clothes (excluding sportswear)	Withdrawn 26 June 1996
92/0338/TEM	1	Temporary change of use from retail to storage and distribution (Class B8 - one year)	Granted 11 June 1992
91/0258/FUL	1	Temporary change of use from retail to storage and distribution (one year)	Granted 22 May 1991
89/0383/FUL	3 & 4	Alterations to proposed ten pin bowling centre	Granted 16 May 1989
88/0888/FUL	3 & 4	Change of use to ten pin bowling and leisure centre	Granted 27 October 1988
87/0629/FUL	2	Change of use to cash and carry warehouse	Granted 30 September 1987
84/1493/03	3 & 4	Erection of 6,364 sqm of retail warehouse and associated car parking	Granted 19 March 1985

#### Access and Parking Arrangements

- 2.14 No alterations to the Retail Park access, circulation or parking arrangements would be made as part of the proposed change of use. These would remain as existing. Similarly, delivery and servicing activity would take place in-line with the existing arrangements for the site under its existing use.

### 3.0 Proposed Development

- 3.1 Planning permission is sought for the:

*"Proposed change of use of premises (Units 1 and 2) from retail use (Class E) to a place of worship and ancillary functions (Class F1) for a temporary period of twelve months."*

- 3.2 There are no physical external works proposed as part of this application, and internal works will be minimal, temporary and not requiring planning permission.

- 3.3 It is proposed that this would be a temporary use for a period of 12 months, after which, the use of the building would revert back to Class E (retail). Accordingly, we would suggest the following planning condition is attached to any forthcoming consent:

*"The use hereby permitted shall be for a limited period of 12 months from the date of this decision. The use hereby permitted shall be discontinued on or before [date] at which point the use of the premises shall return to class E."*

#### **Rediscover Church: Background**

- 3.4 The Rediscover Church is located at the heart of the City Centre and has a congregation of circa 400 members. The church has a long history in Exeter. Originally known as the Elim Church, it was founded in 1915 and has served the community in Exeter since 1928. The congregation later began meeting in the Providence Chapel on Northernhay Road which continues to be its home today. In 2016 the Church was renamed 'Rediscover Church'.
- 3.5 The Church has grown significantly over the years and has been looking for an additional space to house the expanding congregation and provide an expanding array of facilities and services to that congregation and the wider community.
- 3.6 They have been actively looking for a new permanent space for circa 8 years, considering both leasehold and freehold opportunities. Due to the size requirements, the leasehold opportunities have largely been warehousing, but the City Council's commitment to increasing warehouse stock together with competition from other commercial operators has resulted in limited opportunities. The Church will continue to look for a long term solution.
- 3.7 Currently, in order to host large capacity events and activities, the Church has to hire event space, varying from indoor auditoriums to outdoor event spaces. One of the key activities undertaken at such facilities is the storage, packing and deployment of food hampers and last Christmas alone, the Church prepared around 1,600 high quality hampers for families in need.
- 3.8 The Church attracts people from a wide catchment area both from within the city and from a 50-mile radius; however, the majority would live within a 15-mile radius of the existing premises.

- 3.9 The Church is now looking for a temporary premises to accommodate its existing and expanding services until a permanent home can be found.
- 3.10 The existing premises will be retained but most of the activity would be moved to the new location, with the exception of offices and a 24/7 prayer centre which is accessed in the current building throughout the day and night.



Source: Rediscover Church Web site: Images on existing church premises



Source: Rediscover Church Web site: Images of congregation at a Sunday event at Exeter Great Hall

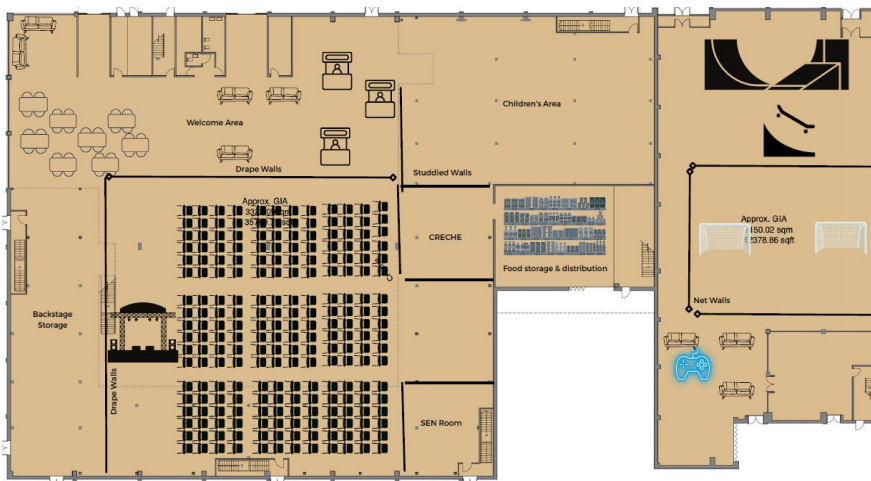
#### **Nature of the Proposed Use**

- 3.11 The principal use of the premises would be for the purposes of worship. Unit 1, the former Range unit, would be converted into an auditorium space with seating across the ground level and at mezzanine level when required. To aid sound insulation, the auditorium would be separated by

thick staging drape. The stage is intentionally oriented into the building so the direction of travel of sound is away from the external wall.

- 3.12 Stud walls provide separate spaces for a welcome area and various children and family rooms and other activities.
- 3.13 Unit 2, the former Matalan unit, would be used as a youth centre/club including sports facilities (including a staking half pipe) with a function which would be ancillary to that of the Church.
- 3.14 The Church proposes to provide a range of facilities and activities for the congregation and wider community, as set out above and will also be looking at other innovations to maximise the use of the space.
- 3.15 The youth venue will be part of the Church's wider operation but will be particularly focussed on young people and will include basic indoor sporting activities including an indoor skate park.

**Figure 3: Proposed Layout of floorspace**



- 3.16 The table below shows an indicative timetable of proposed events:

	Activity	Frequency/No. of People
Sunday	AM & PM Services	Between 500 and 1000
Monday	Daytime drop in & groups / Evening Prayer Event	weekdays – between 50 – 300
Tuesday	Daytime drop in & groups / Evening Young Adult & Student Event	
Wednesday	Daytime drop in & groups / Evening Alpha Course	



Thursday	Daytime drop in & groups / Evening Worship Team rehearsals / Music workshops	
Friday	Daytime drop in & groups / Evening Events	
Saturday	Training Events / Conferences / Occasional Evening Events	Special conferences 300-2000

## 4.0 Planning Legislation

- 4.1 Section 72 of the Town and Country Planning Act 1990 (as amended) relates to the conditional grant of planning permission.

*"(1) Without prejudice to the generality of section 70(1), conditions may be imposed on the grant of planning permission under that section—*

*(a) for regulating the development or use of any land under the control of the applicant (whether or not it is land in respect of which the application was made) or requiring the carrying out of works on any such land, so far as appears to the local planning authority to be expedient for the purposes of or in connection with the development authorised by the permission.*

*(b) for requiring the removal of any buildings or works authorised by the permission, or the discontinuance of any use of land so authorised, at the end of a specified period, and the carrying out of any works required for the reinstatement of land at the end of that period".*

*(2) A planning permission granted subject to such a condition as is mentioned in subsection (1)(b) is in this Act referred to as "planning permission granted for a limited period".*

- 4.2 National Planning Policy Guidance sets out the circumstances where a temporary permission may be appropriate, as follows:

*"Circumstances where a temporary permission may be appropriate include where a trial run is needed in order to assess the effect of the development on the area or where it is expected that the planning circumstances will change in a particular way at the end of that period.*

*A temporary planning permission may also be appropriate to enable the temporary use of vacant land or buildings prior to any longer-term proposals coming forward (a 'meanwhile use').".*

- 4.3 In accordance with the relevant legislation and guidance, the proposals would allow the existing buildings to be used for the benefit of the wider community, until such a time that the redevelopment of the site is commenced. It would further allow an important community use to provide much needed facilities and services.

## 5.0 Planning Policy Context

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that, if regard is to be had to the Development Plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan, unless material considerations indicate otherwise.
- 5.2 This section sets out the planning policies at national and local level which we consider are relevant in providing the context against which the planning application may be considered.
- 5.3 The overall planning policy context is set by the National Planning Policy Framework (July 2021) and by the Development Plan which for the site comprises the Core Strategy (February 2012) and Local Plan First Review 1995-2011 – Saved Policies.
- 5.4 The review of the Development Plan has commenced with the outline draft Exeter Plan available for public comment between 26 September and 19 December 2022. The Regulation 19 consultation Draft is expected to be published Autumn 2023. As such the emerging plan is a material consideration with very limited weight.

### National Planning Policy Framework (July 2021)

- 5.5 The National Planning Policy Framework (NPPF) was last updated in July 2021 and promotes the delivery of sustainable development that meets the needs of the community. Paragraph 8 sets out that there are three overarching objectives to sustainable development, which are an economic objective, a social objective, and an environmental objective.
- 5.6 The theme of sustainable development is consistent throughout the NPPF. Paragraph 11 highlights that plans and decisions should apply a presumption in favour of sustainable development, which means approving development proposals that accord with an up-to-date Development Plan without delay.
- 5.7 Chapter 8 promotes healthy and safe communities. Paragraph 93 states that to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should “plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments” (criterion a).

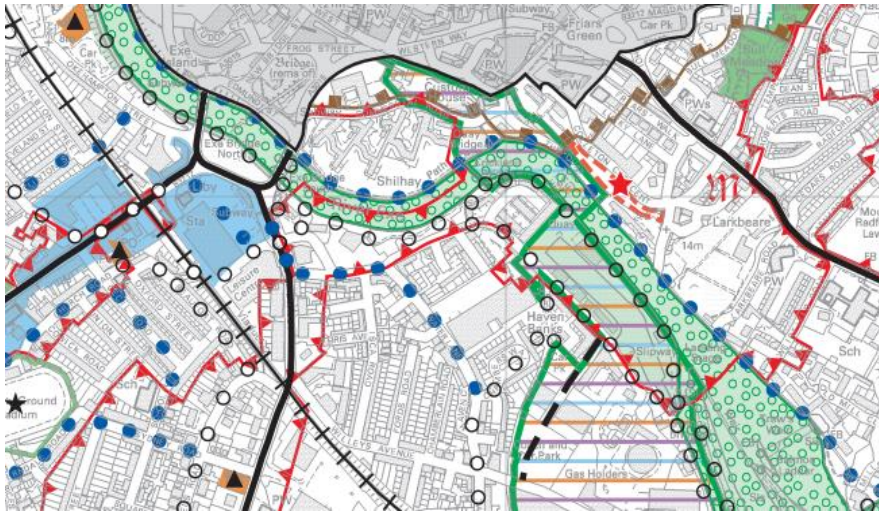
### Planning Designations

- 5.8 The site is identified as lying within the urban area but is otherwise undesignated on the Local Plan Policies Map.



- 5.9 The site lies within Flood Zone 3 associated with the River Exe. However, flood defence works have recently been completed, which have provided greater protection from flooding to the site and wider Water Lane area

**Figure 3: Extract from Proposals Map**



Source: Extract from Local Plan Proposals Map (2015)

#### **Core Strategy (February 2012)**

- 5.10 The relevant policies in the Core Strategy (21 February 2012) are as follows:

- Policy CP10 Meeting Community Needs;
- Policy CP12 Flood Risk.

#### **Local Plan First Review 1995-2011 'Saved' Policies**

- 5.11 The saved policies which are pertinent to this application submission are set out below:

- Policy CS8 Places of Worship;
- Policy T1 Accessibility to New Development;
- Policy T3 Encouraging Use of Sustainable Modes of Transport;
- Policy T9 Safe and Convenient Access
- Policy T10 Car Parking;
- Policy EN4 Flood Risk;
- Policy EN5 Noise.

#### **Material Planning Considerations**

- 5.12 The following are material planning considerations relevant to the application:



- Sustainable Transport SPD (2013);
- Exeter Sustainable Community Strategy (Exeter Vision).

Emerging Exeter Local Plan (Outline Draft)

5.13 Draft Policy IC2 Community facilities states as follows:

*"... proposals to provide new or improved services and facilities will be supported. Facilities that serve the city as a whole should be located in the city centre or, if this is not feasible, at sustainable locations which are readily accessible by public transport, cycling and walking".*

## 6.0 Planning Considerations

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 require that, if regard is to be had to the Development Plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the Plan, unless material considerations indicate otherwise. This section assesses the planning considerations that we consider relevant to the current application, and which may be summarised as follows:

- Principle of Development;
- Noise and Amenity;
- Highways and Parking;
- Flood Risk and Drainage;
- Other Considerations.

6.2 The above matters are considered under the relevant headings below.

### Principle of Community Use

6.3 The Site comprises part of an existing retail warehouse located within the urban area of Exeter, a short distance from the city centre. There is no policy presumption against the loss of the existing retail use which now falls within Class E. The site is part of a wider current planning application (Reference: 22/1145/FUL) for redevelopment and the existing buildings will be demolished as part of proposals for a new mixed-use neighbourhood. The existing buildings are vacant, and a temporary use allows the buildings to be optimised and put into beneficial use until such time that the wider development proposals are commenced, or the temporary consent lapses, whichever is sooner. Vacant buildings typically fall into disrepair and the use will provide security and ensure the site is well maintained.

6.4 Policy CS8 supports development of, or a change of use to, a place of worship provided that:

*"a. Safe and convenient access by public transport, walking or cycling is available or can be provided;*

*b. It will not harm local amenity".*

6.5 The supporting text to Policy CS8 recognises the demand for new religious premises (para 8.14).

6.6 Paragraph 8.15 recognises that the needs of church groups to be located in the city centre or central urban locations:

*"Unlike traditional churches which were built to serve local parishes, new religious groups draw congregations from a city-wide or even larger area. Consequently, the appropriate location for such an operation is in the City Centre, or failing that a district centre, where access by a choice of*

*means of transport is available. Development opportunities for such uses are clearly constrained by the limited number of sites and their suitability for other uses, particularly housing. Nevertheless, there is potential in under-used space over shops and in disused buildings on the edges of the City Centre and district centres that is sufficient for the likely level of demand”.*

- 6.7 Core Policy CP10 protects facilities that meet Exeter’s community, social, health, welfare, education, spiritual, cultural, leisure and recreational needs. It states *that “facilities which serve the city as a whole should be located in the City Centre or, if this is not feasible, at sustainable locations which are readily accessible by all modes of travel, particularly public transport”.*
- 6.8 Supporting text to Policy CP10 states that *“important considerations with regard to new facilities are their scale and location and the degree to which they contribute to social inclusion and help to reduce deprivation. Facilities, such as cultural, recreational and sports facilities, which have a large catchment and serve the city as a whole, should, if feasible, be located in the City Centre where they are accessible to all by public transport. Other facilities such as surgeries, youth clubs, outreach centres, primary schools, community halls, places of worship, allotments and play areas have smaller catchments and normally need to be close to where people live, preferably within easy walking distance of them.*
- 6.9 The site is a circa 10 minute walk from the city centre and is well served by cycle routes and public transport being directly on a number of bus routes. In this case the Church does not have a small local catchment, with the congregation coming from a wide catchment area with some members travelling up to 50 miles. It is not possible to find such a large space within the City Centre but the proposed location, just a short distance from the centre, provides a sustainable location easily accessible to the congregation by a variety of transport modes.
- 6.10 The supporting text of Policy CS8 specifically references the difficulty in finding suitable sites in the city centre and this is precisely the issue that the Church has been facing.
- 6.11 The Church serves a vital role in the community in terms of not only worship but its wider range of services and facilities, including their outreach work and initiatives for younger members of the community. The proposals therefore fully support the objectives of Policies CS8 and CP10 to deliver places of worship and community facilities. The site is a sustainable location that provides the required space, with optimal accessibility based on the catchment, without causing harm to local amenity.
- 6.12 The matters of residential amenity and traffic impact are dealt with in more detail in the following paragraphs.

#### **Noise and Amenity**

- 6.13 An important consideration for the proposed change of use is its potential impact in terms of noise and any associated impacts on amenity.

- 6.14 Policy EN5 of the Local Plan states that *"noise generating development will not be permitted if it would be liable to increase adversely the noise experienced by the users of existing of proposed noise- sensitive development nearby"*.
- 6.15 The application site is a former retail park and thus would have generated a level of noise and activity commensurate with this use. The adjoining 'Tenpin' unit provides a variety of leisure uses within the unit and is open until 12am. We are not aware of any noise issues and impacts relating to this existing use, over and above those to be expected at a large retail and leisure site and car park.
- 6.16 Whilst all activities will be undertaken inside the premises and as a result, noise break out will be minimised, in terms of further noise mitigation, the walls of the auditorium would be formed of thick staging drape, providing a further buffer between the source of noise generation (predominantly music played during worship) and surrounding residential uses.
- 6.17 In addition to this, the stage would be oriented into the centre of the building so the direction of travel of sound is away from the external wall.
- 6.18 This current planning application is supported by a Noise Impact Assessment prepared by PC Environmental. Environmental noise measurements were carried out from Friday 18th to Tuesday, 22nd August 2023. Sound level measurement equipment was installed on the land adjacent to Unit 1 and opposite properties on Water Lane (closest properties to Unit 1). Ambient (LAeq) noise levels were measured. Average noise levels for the daytime (0700 to 2300 hrs) and night-time period (2300 to 0700 hrs) were determined as follows:

	<u>Day</u>	<u>Evening</u>	<u>Night</u>
<u>L<sub>Aeq</sub> (dB)</u>	59.1	57.2	51.9
<u>L<sub>A90</sub> (dB)</u>	42.1	37.7	31.1

- 6.20 To provide a comparison of noise generation, noise monitoring was also carried out in the existing Providence Chapel from 18th to 22nd August 2023. This period included both the Sunday morning service and Monday evening service. The data shows that during the Sunday service noise levels (LAeq,5min) are on average 85 dB rising to a maximum of 88 dB. Noise levels during evening service are lower than Sunday service. Average and maximum (LAeq,5min) noise levels measured for the evening service were 80 dB and 84 dB respectively.
- 6.21 To understand how such levels would be contained within the existing warehouse, measurements of the sound insulation performance of the external walls at Unit 1 were carried out. The acoustic insulation of the glazed façade was found to be Rw 26 dB and the brickwork walls Rw 44 dB. The acoustic performance of the roof is estimated to be Rw 32 dB.

- 6.22 The acoustic model is based on maximum LAeq, 5 minute internal sound levels measured during Sunday service and shows that noise levels at the nearest residential properties (in Water Lane) would be 47 dB(A) and less than 50 dB(A) in the rear gardens of properties in Chandler's Walk. The results of the noise modelling exercise show, when typical attenuation provided by partially open windows is accounted for, internal noise levels in neighbouring properties will satisfy accepted limits.
- 6.23 It is, however, recognised that a comparison of predicted noise levels with existing background noise levels in the area (approximately 42 dB LA90 and 38 dB LA90 for daytime and evening periods respectively) shows that noise during Church Services may be audible externally.
- 6.24 It should be reiterated that the services are relatively short duration (1 to 2 hours) and will occur at prescribed times. To avoid any audible noise, a sound limiting system could be introduced.
- 6.25 Accordingly, it is considered that as required by Policy EN5 there would be no adverse noise impacts to the surrounding residential properties.

#### **Highways and Parking**

- 6.26 This application is supported by a Transport Statement (TS) and a Travel Plan Statement prepared by RGP.

#### **Sustainable Transport**

- 6.27 A priority for the church is to be located in an area with good accessibility by all forms of transport including public transport and by foot and cycle. The church has a wide catchment area and the congregation use a variety of transport modes depending on their distance from the church. Based on how the congregation arrive at the existing site approximately 15-20% arrive on foot or cycle, 15-20% would arrive by public transport with circa 60% arriving by car with around 40% of these sharing lifts. It is envisaged that this would be the same for the new site.
- 6.28 Policy T1 requires that development should facilitate the most sustainable and environmental modes of transport having regard to the transport hierarchy. Further to the transport hierarchy outlined above, Policy T2 requires that new development is strategically located to benefit from sustainable modes, specifically stating the following:
- "Non-residential development should be accessible within walking distance and/or by bus or rail to a majority of its potential users."
- 6.29 The site's location is conducive to sustainable travel, owing to its proximity to Exeter city centre and surrounding areas. The sites accessibility credentials are set out in detail in the supporting Transport Statement. The site is located approximately 600m (a 7-minute walk) to the southeast of Exeter St Thomas rail station. The nearest bus stops to the site are located on Water Lane, in the immediate vicinity (within 50 metres) of the Retail Park access. These stops are served by

Stagecoach's 'Green' bus route, which typically provides services every 20 minutes between Matford Park & Ride and Sowton Park & Ride. Services operate on weekdays (excluding Bank Holidays) and Saturdays.

- 6.30 There is a good provision of pedestrian infrastructure provided throughout the local area and the wider city centre. There are lit footways provided along both sides of Haven Road and Water Lane in the vicinity of the site, providing direct pedestrian links into the site from both points of access.
- 6.31 Policy T3 also seeks to promote and encourage the use of sustainable modes by providing connections to key pedestrian / cycle routes. The surrounding area is also well-suited to cycling, with a number of designated cycle routes provided in close proximity to the site. The local highway network is conducive to cycle journeys owing to the quiet nature of nearby roads, their flat topography and good visibility at junctions.
- 6.32 The proposals are therefore in accordance with Policies T1, T2 and T3 promoting sustainable transport including walking and cycling as much as possible and adhering to the transport hierarchy.

#### **Trip Generation and Highways Impact**

- 6.33 The supporting TS compares the trip generation figures of the existing lawful use with the those associated with the proposed site use. This is based on the modal split of the existing church. Taking Sunday as an example the proposed use would likely generate an overall increase in the total person movements within the order of 877 additional two way person movements daily and some 315 additional two-way movements during the Sunday peak hour. However there would be a net reduction of -298 two-way vehicle trips over the course of a typical Sunday, and a negligible change in traffic during the Sunday peak hour (para 4.4.6). This is due to increased sustainable travel use.

#### **Car and Cycle Provision**

- 6.34 No alterations to the car park or its associated access, egress or circulation arrangements are incorporated as part of the proposed change of use.
- 6.35 In terms of the Sunday profile, the proposed site use could generate a parking demand of up to 360 cars. While many of these (circa 150 – 160 cars) could be accommodated within the Retail Park car park, it is acknowledged that the remaining 200 cars or so would need to park in alternative locations. The TS identifies the public car park availability around Haven Banks and within the City Centre within 1 km (a 12 minute walk). There are a further 2,346 public car parking spaces in Exeter city centre within a 12-minute walk of the site and could easily accommodate any demands that could not be accommodated within the Retail Park car park or the other local car parks in the Haven Banks area.

- 6.36 In relation to cycle parking, there are no local standards provided in relation to places of worship. There are a number of existing public cycle parking spaces provided locally, including within the pedestrianised quayside area opposite the Retail Park. From discussions with Rediscover Church, there would also be suitable space within the site for cycles to be securely stored as necessary. Cyclists that currently visit the Rediscover Church premises at Northernhay Street store their cycles in public cycle parking areas, or informally on the site.

#### **Flood Risk and Drainage**

- 6.37 This planning application is supported by a Flood Risk Assessment prepared by Richard Jackson Limited.
- 6.38 Policy EN4 states that development will not be permitted if *inter alia* it would increase the likelihood of flooding or it would be at risk itself from flooding.
- 6.39 The application is for the change of use of an existing building. There would be no change to the built form and flood impacts. The site is currently classed as commercial which is defined as “Less Vulnerable” in accordance with the vulnerability classification of the NPPF. The change of use to a Church will not change this vulnerability classification. The use would be a sporadic use; used for short periods of time by visiting members of the congregation and would not be operational during a flooding event.
- 6.40 The flood map for planning shows that the entire site is in flood zone 3. However, the proposed change of use will not alter the building in any way, such that the risk remains the same as for the previous commercial use. As this is a change of use, hence, the sequential test does not apply to these proposals.
- 6.41 It is also worth noting that the site currently benefits from flood defences. A major upgrade of the Exeter flood defence was constructed between 2014 and 2021 after the Environment Agency’s 2011 flood modelling data.
- 6.42 A proposed temporary (12-month maximum) change of use from commercial premises to a Church has the potential to increase the number of persons on the site during a Church event. Visitors and congregants are likely to peak during Sundays, however, the site is unlikely to be occupied overnight.
- 6.43 Should a flood event occur, the risk of breaching or overtopping the flood defences is relatively low and the site would be protected by the new enhanced defences. The building can be closed to all persons and left unoccupied as per the current situation.
- 6.44 The proposals will not have an adverse effect on a watercourse, floodplain or its flood defences, impede access to flood defence and management facilities, or, have a significant effect on local flood storage capacity or flood flow and are therefore compliant with the NPPF and Policy EN4.

## 7.0 Summary and Conclusions

- 7.1 This Planning Statement has been prepared by Union4 Planning on behalf of Wellbeck CP (Haven Road) Ltd for the *Change of use of premises from retail use (Class E) to a place of worship and ancillary functions (Class F1) for a temporary period of twelve months.*”
- 7.2 There are no physical external works proposed as part of this application. It is proposed that this would be a temporary use for a period of 12 months, after which, the use of the building would revert back to Class E (retail). Accordingly, we would suggest an appropriate time restricting planning condition.
- 7.3 The Rediscover Church has a long history in Exeter and has been looking for a permanent new space for over 8 years. The proposed warehouse building provides the necessary floorspace to provide for the growing congregation and gives the capacity to expand facilities and services in the short-term while a permanent home is sourced. It is in a location that is appropriate for the congregation providing the necessary sustainable transport links and accessibility.
- 7.4 The existing buildings are vacant, and a temporary use allows the buildings to be optimised and put into beneficial use until such time that the wider development proposals are commenced, or the temporary consent lapses, whichever is sooner.
- 7.5 With regard to amenity the site is already a commercial use and the impact to the surrounding residential properties would be no greater that could be expected from the existing use. The supporting Noise Survey confirms that, internal noise levels in neighbouring properties will satisfy accepted limits. Based on background noise levels it is recognised that that noise during Church Services themselves (1 -2 hours) may be audible externally but to avoid any audible noise, a sound limiting system could be introduced.
- 7.6 With regards to transport the site is in a sustainable location and is easily accessible from the City Centre by walking or cycling and public transport. Car usage is limited by car shares and other measures set out within the Travel Plan but can be accommodated within the capacity of the existing car parks.
- 7.7 With regard to Floodrisk, there would be no change to the built form and flood impacts.
- 7.8 In summary the proposals seek to deliver space for an organisation which is an important longstanding place of worship, providing a wider range of services to the community.
- 7.9 We consider that the proposed development accords with all relevant adopted planning policies and associated guidance at the local and national level. Accordingly, we would respectfully submit that planning permission should be granted, subject to the imposition of appropriate and necessary conditions.