



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

March 2025



UNION4
PLANNING

Document Control

Project: Haven Banks Temporary Church Use

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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 estate which is the subject of a current planning application with a resolution to grant secured at planning committee for a comprehensive development to deliver a new mixed-use neighbourhood (Application Reference 22/1145/FUL).
- 1.3 Planning permission was previously granted on the 19 January 2024 for the change of use of Units 1 and 2 from retail (Class E) to a place of worship and ancillary uses (Class F1) for a temporary period of 12 months from the date of occupation. Following the required discharge of the details of cycle parking, Rediscover Church began operating from the units on 20 April 2024 and thus the current consent expires on 20 April 2025.
- 1.4 The wider regeneration proposals to deliver a new, mixed-use neighbourhood have a resolution to grant subject to the completion of a s106 legal agreement, however it is expected to take more than 12 months to finalise and sign the s106 agreement, to discharge pre commencement conditions and to commence site works impacting Units 1 and 2. The new venue has been a huge success for the church in its first year of operation and they wish to continue the use of the units until redevelopment of the wider site commences.
- 1.5 As was the case with the previous application, Welbeck CP (Haven Road) Ltd as owner of the site, are the applicant and will enter leasehold arrangements to allow the Church to occupy the premises for an additional year.
- 1.6 The Rediscover Church continues to have a permanent home on Northernhay Street in the heart of the city. On occupying Units 1 and 2 in April 2024 most of the services were decanted to the new space. The units now accommodate the auditorium for worship together with the ancillary community services and facilities such as the youth centre and parents and toddler groups.
- 1.7 The Church has been looking for a new permanent home to provide a larger space for worship as well as a wider range of facilities and activities for many years. Whilst the church continues to look for a permanent home the space at Unit 1 and 2 provides a vital temporary solution.
- 1.8 The church therefore seeks to continue to use the premises as they have over the last 10 months. This would be a 'meanwhile use' for a period of 12 months from the date of permission/occupation. The church has not had any complaints directly regarding their operations at the site and are not

aware of any complaints raised elsewhere. The use would therefore continue on the same basis as the current occupation.

Application Submission

1.9 This planning application comprises the following documents:

- Application Form and Certificates;
- Site Location Plan (1:1250);
- Proposed Ground Floor plan -0583 Rev P3;
- Planning Statement; and
- CIL Questionnaire Form.

1.10 The application also includes the following supporting documents:

- Noise Impact Assessment (5 September 2023)- prepared by PC Environmental;
- Acoustic Assessment Report Addendum (28 November 2023)- prepared by PC Environmental;
- Transport Assessment (August 2023) - prepared by RGP;
- Travel Plan Statement (August 2023)- prepared by RGP;
- Flood Risk Assessment of Temporary Change of Use (July 2023) - prepared by Richard Jackson Engineering;
- Flood Warning and Evacuation Plan for Temporary Change of Use.

1.11 The above supporting reports were submitted as part of the previous temporary change of use permission and remain unchanged.

1.12 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.

Figure 1: Site Location (boundary approximate)



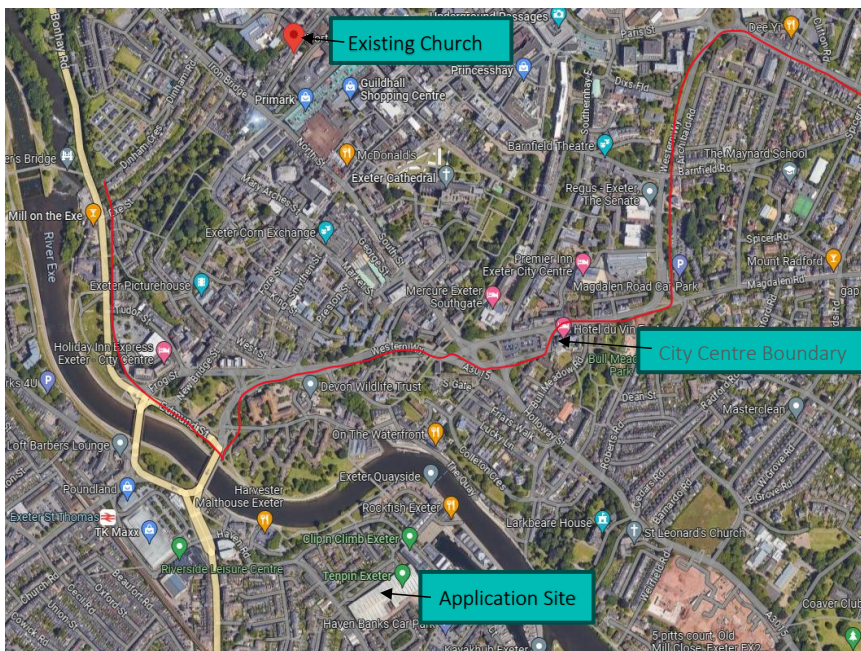
Source: Google Maps (August 2023); annotated by Union4 Planning

- 2.3 Units 1 and 2 have been occupied by the Rediscover Church since 20 April 2024. Unit 1 has been converted into the auditorium space for church services with seating across the ground level (and at mezzanine level when required). Space is also provided for ancillary activities such as children's soft play. Unit 2 is used as the youth centre/club element with space for sports activities such as football with a function which is ancillary to that of the main church. Cycle racks are located internally within each unit.
- 2.4 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. 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 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 On the 19 January 2024 planning permission (Reference 23/1114/FUL) was granted for the Change of use of Units 1 and 2 from retail (Class E) to a place of worship and ancillary uses (Class F1) (temporary period of twelve months from occupation).
- 2.13 On the 28 February 2024 details were approved for the discharge of condition 6 (cycle parking) of planning Permission 23/1114/FUL.
- 2.14 Planning application reference 22/1145/FUL was approved at planning committee in December 2023, subject to the completion of a s106 legal Agreement, for the following development:

"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".

2.15 The remaining planning history for the site is summarised below:

Table 1: Summary of Planning History

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	Withdrawn

		distribution warehouse (mixed D2/B8 Use Class), with flexibility to change back to a retail warehouse (A1 Use Class).	
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 ancillary items. (Certificate of Lawfulness of Existing Use) under section 191 (1) (c) Town and Country Planning Act	Refused 16 July 2003
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

- 2.16 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 The Rediscover Church have been occupying the premises under the previous temporary change of use permission (Reference 23/1114/FU) for the past 10 months. This use would continue in the same way as it is currently operated. As part of this consent, details of cycle parking were confirmed via condition and this application therefore includes the retention of this existing parking.

3.4 The application seeks a further temporary use for a period of 12 months, after which, the use of the building would again 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, after which the use of the premises shall revert to class E."

Rediscover Church: Background

3.5 The Rediscover 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'.

3.6 These original premises have been retained but most of the activities with the exception of offices and a 24/7 prayer centre now take place from the application site.

3.7 The Church has grown significantly over the years and has been looking for an additional space for the expanding congregation and provide an expanding array of facilities and services to that congregation and the wider community. 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.

3.8 In the interim they wish to stay in occupation at Units 1 and 2 utilising the space until it is brought forward for redevelopment.



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

Nature of the Proposed Use

- 3.9 The use will continue in the same way as it has done for the previous 10 months.
- 3.10 The principal use of the premises would be for the purposes of worship. Unit 1 would continue to function as the 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.
- 3.11 Stud walls provide separate spaces for a welcome area and various children and family rooms and other activities.
- 3.12 Unit 2 would continue to be used as a youth centre/club including sports facilities with a function which would be ancillary to that of the Church.
- 3.13 The Church provides a range of facilities and activities for the congregation and wider community, as shown on the proposed layout plan 0582 Rev P3 (Figure 3 and table 2). The youth venue will be part of the Church's wider operation and will include basic indoor sporting activities including football and other team sports.

Figure 3: Proposed Layout of floorspace



3.14 Table 2 below shows an indicative timetable of proposed events. This is largely the same as shown in the previous application, but now based on 10 months of actual operations which has confirmed that the average congregation numbers and attendees at occasional conferences are slightly lower than the upper levels set out in the previous application.

Table 2 – Church Activities

	Activity	Frequency/No. of People
Sunday	AM & PM Services	Between 500 and 900
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 300-900

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 The timescales associated with the wider redevelopment proposals for Haven Banks means that the units will continue to be available for the next 12 months. In this case the continued temporary use of the units by the church is the most appropriate solution for the site. 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 Development Plan is under review with the Regulation 19 Publication Draft published for consultation in December 2024. The City Council expect to submit to the secretary of State in Summer 2025. The emerging plan is a material consideration with limited weight.

National Planning Policy Framework (December 2024)

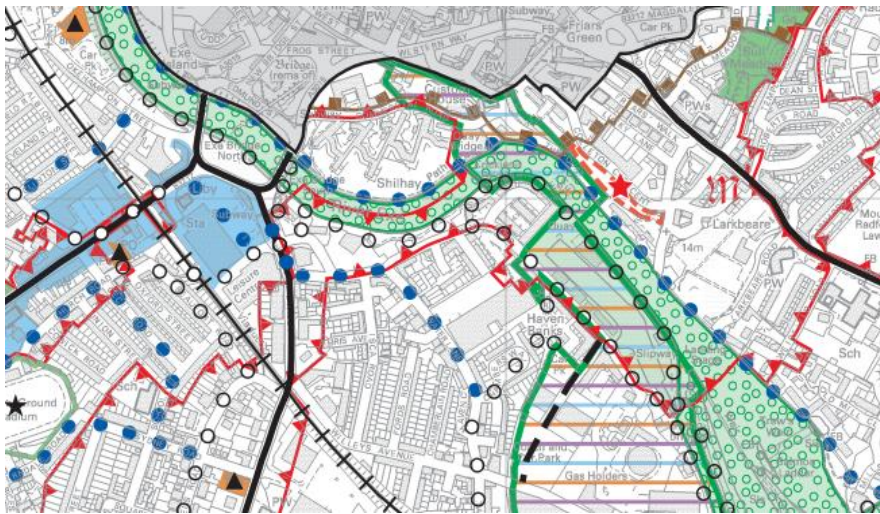
- 5.5 The National Planning Policy Framework (NPPF) was last updated in December 2024 and promotes the delivery of sustainable development that meets the needs of the community. Paragraph 8 sets out that there are three overarching objectives to sustainable development, which are an economic objective, 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 98 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 1995-2911' 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 Policy IF3 sets out the approach for the protection of existing, and delivery of new, community facilities in the city. Emerging Policy IF3 Community facilities states as follows:

"... Development proposals for new or improved community facilities will be supported. Ongoing engagement in the development process should take place with local communities to ensure that needs are understood, planned for and met".

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 can 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 application site currently benefits from the temporary change of use of Units 1 and 2 from retail (Class E) to a place of worship and ancillary uses (Class F1), which expires on 20th April 2025. Under this new application proposal, the church use would continue in the same way as it has for the previous 10 months.

6.4 Notwithstanding the current permission, 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.

6.5 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".

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

6.7 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".

- 6.8 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"*.
- 6.9 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.*
- 6.10 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.
- 6.11 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.
- 6.12 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.

Noise and Amenity

6.13 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".

6.14 The church has now been occupying the units for over 10 months. Within this time they have received no complaints regarding noise and are not aware of any issues being raised with ECC or any other bodies. As is the existing situation, all church activities will continue to be undertaken inside the premises. To minimise noise breakout the following mitigation measures have been introduced:

- the walls of the auditorium have thick staging drapes, providing a further buffer between the source of noise generation (predominantly music played during worship);
- Carpet tiles have been fitted to the floor;
- the stage is oriented into the centre of the building so the direction of travel of sound is away from the external wall;
- The speaker system will be fixed in place in the central area of the unit with speakers focussed away from rear wall and glazed area.

6.15 The previous application was supported by a Noise Impact Assessment and a subsequent Addendum both prepared by PC Environmental.

6.16 As part of the original assessment Environmental noise measurements were taken 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>LAeq (dB)</u>	59.1	57.2	51.9
<u>LA90 (dB)</u>	42.1	37.7	31.1

6.18 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 showed 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 were lower than Sunday service. Average and maximum (LAeq,5min) noise levels measured for the evening service were 80 dB and 84 dB respectively.

- 6.19 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 was estimated to be Rw 32 dB.
- 6.20 The acoustic model was 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 showed, that when typical attenuation provided by partially open windows is accounted for, internal noise levels in neighbouring properties will satisfy accepted limits.
- 6.21 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) concluded that noise during Church Services may be audible externally, however it should be reiterated that the services are relatively short duration (1 to 2 hours) and will occur at prescribed times.
- 6.22 An addendum report (November 2023) provided additional clarifications in respect of the acoustic performance of Unit 1 and consideration of both the maximum noise levels and the frequency of the noise levels. This confirmed that the audible noise would be in mid-frequencies only. These conclusions were considered to be acceptable in terms of assessing noise impacts. Over the course of the last 10 months, we are not aware of any issues or complaints from the surrounding residential properties in terms of noise nuisance.
- 6.23 The nature of the use remains unchanged from that previously assessed and thus the findings of the acoustic reports remain extant and applicable to this application. 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

- 6.24 The proposals remain unchanged from the previous temporary permission and thus the Transport Statement (TS) and a Travel Plan Statement prepared by RGP remain extant and are submitted in support of this application.

Sustainable Transport

- 6.25 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. It is estimated that approximately 15-20% arrive on foot or cycle, 15-20% arrive by public transport

with circa 60% arriving by car with around 2 thirds of these sharing lifts. It is envisaged that this will continue to be the case.

- 6.26 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."

- 6.27 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.
- 6.28 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.
- 6.29 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.
- 6.30 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

- 6.31 The supporting TS compares the trip generation figures of the existing lawful use with the those associated with the proposed (continued) site use. This is based on the modal split of the existing church. Taking Sunday as an example the proposed use would 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

- 6.32 No alterations to the car park or its associated access, egress or circulation arrangements are incorporated as part of the proposed change of use.
- 6.33 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.
- 6.34 In relation to cycle parking, this was secured by condition attached to the previous consent and will be retained as existing. This level of cycle provision has provided to be sufficient for the church's needs.

Flood Risk and Drainage

- 6.35 This planning application is supported by a Flood Risk Assessment prepared by Richard Jackson Limited. This report remains unchanged from the previous submission.
- 6.36 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.
- 6.37 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.
- 6.38 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.
- 6.39 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.

- 6.40 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.
- 6.41 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.
- 6.42 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 The Rediscover church has been in occupation of Units 1 and 2 since 19 April 2024 under planning permission Reference 23/1114/FUL. The proposed use and activities carried out would be the same as that previously approved and ongoing at the site.
- 7.3 There are no physical external works proposed as part of this application. It is proposed that this would be a temporary use for a further 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.
- 7.4 The Rediscover Church has a long history in Exeter and has been looking for a permanent new space for over 8 years. The building provides a vital temporary home until a permanent space can be found. The 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.
- 7.5 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.
- 7.6 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, although audible noise would be in mid-frequencies only.
- 7.7 The conclusions of the Acoustic Report were considered to be acceptable in terms of accessing noise impacts for the previous application. Furthermore over the course of the last 10 months, the church is not aware of any issues or complaints from the surrounding residential properties in terms of noise nuisance.
- 7.8 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.

- 7.9 With regard to Flood risk, there would be no change to the built form and flood impacts.
- 7.10 In summary the proposals deliver space for an organisation which is an important longstanding place of worship, providing a wider range of services to the community whilst maintaining the site in beneficial use until a time that the wider regeneration proposals are brought forward.
- 7.11 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.