



Appeal Decision

Hearing held on 4 November 2025

Site visit made on 4 November 2025

by **S A Hanson BA(Hons) BTP MRTPI**

an Inspector appointed by the Secretary of State

Decision date 25 November 2025

Appeal Ref: APP/C5690/C/25/3368289

Unit 17-18 Bellingham Trading Estate, Franthorne Way, London SE6 3BX

- The appeal is made under section 174 of the Town and Country Planning Act 1990 (as amended).
 - The appeal is made by Redeemed Christian Church of God His Glory Tabernacle ("the Church") against an enforcement notice issued by the Council of the London Borough of Lewisham ("the Council").
 - The notice was issued on 29 May 2025.
 - The breach of planning control as alleged in the notice is: The unauthorised material change of use from Use Class B8 (Storage or distribution) to Use class F1 (Place of Worship).
 - The requirements of the notice are to:
 1. Cease the use of Units 17 & 18 as a place of worship.
 2. Make good all damage resulting from the compliance with the requirements of this notice
 3. Remove all materials, debris, waste and equipment resulting from compliance with the requirements of this notice from the land.
 - The period for compliance with the requirements is 3 (three) months.
 - The appeal is proceeding on the grounds set out in section 174(2)(a), (g) of the Town and Country Planning Act 1990 (as amended). Since an appeal has been brought on ground (a), an application for planning permission is deemed to have been made under section 177(5) of the Act.
-

Decision

1. The appeal is dismissed, the enforcement notice is upheld and planning permission is refused on the application deemed to have been made under section 177(5) of the 1990 Act as amended.

Preliminary Matters

2. The Lewisham Local Plan 2020-2040 ("the LLP") was adopted on Wednesday 16 July 2025 during the process of the appeal. This supersedes the Lewisham Core Strategy 2011, and the Lewisham Development Management Local Plan 2014 documents and their policies which were referred to in the Notice. Copies of the LLP considered relevant to the appeal were provided by the Council and the appellant prior to the Hearing and discussions at the Hearing centred on the new Policies and those contained within the existing London Plan 2021 ("the LP21").

Ground (a) and the Deemed Planning Application

Main Issues

3. The main issues are whether the use of Units 17 and 18 as a place of worship is acceptable within the Strategic Industrial Location (SIL) and the impact of the use on the function of the SIL.

Reasons

Background

4. The appeal relates to the material change of use of two large industrial units positioned at the far end of the Bellingham Trading Estate (“the Estate”) to a place of worship. The Church currently occupies Units 17, 18 and 19 of the Estate, with a floor area of some 1,527m². Unit 19 does not form part of the Notice. The Estate, which houses 24 units, is designated as a SIL by Policy E5 of the LP21.
5. The appellant contends that, while they acknowledge the policy framework which seeks to safeguard employment land, and in the absence of any development plan policies allocating sites for places of worship, the use would not undermine the primary function of the Estate. They argue that the Church use could “dovetail” by operating in a manner that complements existing activities, given that its peak periods of use would mostly occur outside the normal operating hours of other businesses.
6. It is further submitted that the Church requires a substantial internal space to accommodate its congregation during worship services and to facilitate ancillary activities. These activities are described as being integral to the Church’s mission and of significant benefit to the local community.
7. The site benefits from a PTAL rating of 3, indicating a moderate level of accessibility by public transport convenient for most of the members who reside locally. For those less able to travel by public transport, the units are said to provide 20 on-site parking spaces. The units are not close to residential properties or other noise-sensitive uses, and it is argued that any noise generated during services does not result in unacceptable harm to other users of the Estate.
8. Evidence of buildings for rent or purchase has been provided by the appellant to seek to demonstrate an absence of suitable accommodation elsewhere. Premises include industrial buildings, business units and places of worship and commentary is provided as to why these have proved to be unsuitable alternatives citing factors such as size, layout and location.
9. The Council’s position is that the proposal is contrary to the development plan. It argues that the use would fail to safeguard the SIL for employment purposes, thereby undermining its function, optimisation, and established character.
10. The units each comprise a substantial open-plan space at ground floor level, with additional smaller rooms located both on the ground floor and upper level to accommodate ancillary activities. While the external appearance of the buildings retains its industrial character, the internal layout has been adapted with modest furnishings to suit the current use. Facilities include performance stages, areas dedicated to music production and enjoyment, as well as rooms for office functions and storage.
11. The appellant explains that the appeal site is used primarily as a place of worship on Sundays between 10:00 and 13:00, accommodating four separate congregations with a combined attendance of approximately 300–350 people. In addition, a monthly Saturday prayer service is held between 08:00 and 10:00 for around 100–120 attendees of all age groups. On the last Friday of each month, 50–70 people attend prayers between 22:00 and midnight, and on the first

Wednesday of each month, approximately 50 people gather for prayers between 19:00 and 21:00. Occasional services are also held at Christmas and New Year, and the premises may host weddings, funerals, and other special events.

12. The Church undertakes a range of charitable activities, including the operation of food, clothing, and electronics banks for the benefit of the local community. These initiatives are said to rely on volunteers from the congregation, with donations of goods and money typically brought to the premises during Sunday services. At the Hearing, it was explained that food packages are prepared on site and distributed within the community. While I have no reason to doubt that these activities take place, at the time of my site visit there was no visible evidence of donated items being stored within the premises.
13. Free educational classes are provided for students preparing for GCSE and A Level examinations. Written submissions suggest that up to 50 students could attend tutoring sessions arriving around 17:00–17:30, after most businesses within the Estate have ceased trading. However, at the Hearing it was clarified that classes generally take place on Saturdays between 16:00 and 18:00, with attendance typically around 18–20 students. It was further explained that no weekday sessions occur on site, as these are delivered online. During the two months preceding examination periods, additional meetings may be held at the premises. Following Sunday services, life skills classes for young adults are also provided for a duration of one to two hours.
14. Counselling is also presented as an important element of the Church's activities. The written submissions indicate that, for counselling to be effective, the premises require "break-out rooms" to allow private and confidential discussions. At the Hearing, it was explained that the level of counselling varies and is generally provided on Tuesday evenings and during Church hours on Sundays. No other formal sessions are held on site, although some support activities are said to take place online.

Strategic Industrial Location

15. The appeal site is located towards the end of a long, narrow trading estate situated between the Thameslink railway line and the Ravensbourne River. The Estate comprises large industrial units positioned on either side of a single no-through road that runs its length. Each unit benefits from allocated parking and loading areas to the frontage. In some cases, shipping containers are positioned within these areas, presumably for storage purposes. Beyond the units, towards the end of the Estate where the road narrows and cannot accommodate further buildings, there are single rows of parking spaces on both sides of the carriageway.
16. Policy E5 of the LP21 states that development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis. SILs should be managed proactively through a plan-led process and development proposals within them should be supported where the uses proposed fall within the industrial-type activities set out in Part A of Policy E4 of the LP21. In addition, development proposals within SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis. The Church use is not an activity set out in Policy E4.

17. In support of Policy E5 of the LP21, Policy EC5 of the LLP refers to developments within and around the SILs area and requires boroughs to proactively manage and sustain SILs. This policy ensures that Lewisham's SILs are safeguarded, and their economic function is enhanced and not compromised by new development. The Borough aims to support a thriving local economy, protect employment land and increase employment floorspace. Policy EC2 of the LLP seeks to safeguard employment land and ensure that land-uses are commensurate with the type and function of land within Lewisham's employment land hierarchy. Furthermore, wherever possible, its aim is to deliver net gains in industrial capacity, including by intensifying the land use.
18. The appellant considers that the Borough has a good range of industrial units and a significant amount of available floorspace. They refer to the search for alternative accommodation, which produced a dossier of available premises, including industrial and business units. It is argued that many of these units offer preferable access arrangements, loading and unloading facilities, and delivery space. On this basis, the appellant contends that any harm arising from the loss of employment floorspace within the Estate would be limited, given the availability of such space, and the quality of some of the space elsewhere in the Borough.
19. Notwithstanding this assertion, there are only two SILs in the Borough and they are said to be continuously occupied. No evidence has been provided to demonstrate otherwise. The primary purpose of SILs is to accommodate industrial activities that may operate on a 24-hour basis in locations less likely to be affected by noise and disturbance. While many units within the Estate may operate predominantly during normal weekday hours, some businesses do not. During my site visit, the Estate was busy and appeared fully occupied. Information provided by occupiers indicates strong demand for B2/B8 units, with reports of premises being let or sold prior to formal marketing. Several occupiers are said to require additional space, evidenced by the presence of shipping containers on site. Demand is also reported to have driven a significant increase in unit prices.
20. There is a principal requirement to protect SILs which are the capital's main reservoir of land for industrial, logistical and related uses. SILs are given strategic protection because they are critical to the effective functioning of London's economy. They can accommodate activities which - by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements - can raise tensions with other land uses, particularly residential development. SILs are important in supporting strategic logistics operations serving the capital as well as providing relatively low-cost industrial space for SMEs. Typically, they are located close to the strategic road network, and many are also well-located with respect to rail, river, canals and safeguarded wharves which can support the sustainable movement of goods from and within London.
21. I acknowledge the appellant's concern regarding the difficulty in securing alternative accommodation that meets their specific requirements. However, the loss of employment floorspace conflict with the strategic objectives of the Development Plan, which seeks to safeguard land for industrial activities capable of operating on a 24-hour basis. Such uses require sites that are specifically suited to their operational needs. Accordingly, I attach substantial weight to this conflict, and I do not consider that the arguments as to why the use is acceptable in this location are considerations sufficient to outweigh the identified harm. Consequently, I find that there is conflict with LP21 Policies D1, D3, E4, E5, GG2,

GG5 and LLP Policies QD1, QD6, CI1, CI2, EC2, EC5. These, amongst other matters seeks to protect employment land in London and in the Borough and ensure that new development does not compromise the integrity or effectiveness of these locations.

The impact of the use on the function of the SIL.

22. The appellant states that they have a longstanding informal arrangement with neighbouring occupiers, allowing the use of parking and hardstanding outside their units during weekdays, and access to other spaces during mornings and weekends. However, representations from third parties raise concerns about significant nuisance arising from the unauthorised use, including insufficient parking provision, obstruction of access and fire routes, noise, and congestion. Doubts have also been expressed regarding the availability of 20 parking spaces, out of the 125 within the Estate, through informal agreements. I was informed at the Hearing that Unit 18 only has 4 spaces allocated in its lease.
23. Of particular concern to other occupiers is the obstruction of HGV turning space, which is said to have compromised legitimate operations within the Estate. Although the appellant suggests that measures have been implemented to address these issues, such as security and parking attendants, evidence has been provided indicating that the Church's use of the units continues to adversely affect the functioning of the wider site, particularly in terms of parking and manoeuvrability. While these impacts may occur mainly outside normal working hours, the Estate is intended to accommodate businesses that require 24-hour access. Any use that inhibits accessibility is therefore harmful to the effective functioning of the SIL.
24. Further to the Church and its ancillary activities, evidence was presented regarding the availability of Unit 18 as a venue for hire at any time for other events. Reference was made to its marketing as "Glory Hall", with a dedicated website and social media presence promoting the space as a luxurious well-appointed versatile venue with chandeliers suitable for weddings, birthday parties, funeral receptions, product launches, and comedy shows. The venue is described as capable of accommodating up to 300 people with on-site parking for 100 vehicles.
25. It is apparent from the evidence that these commercial offerings, combined with the Church's regular activities, have significantly intensified the unauthorised use of the site, further impacting the operational efficiency of the industrial estate.
26. Further to the concerns regarding parking and manoeuvrability, representations also raise issues about the safety of congregation members, which can include children, moving through the Estate where large vehicles and heavy industrial machinery operate. This is particularly relevant given the narrowness of the Estate, the proximity of the units to one another, and the overriding health and safety considerations associated with an industrial site. While I note the presence of railed walkways along the frontage of some units, the Estate is clearly not designed to accommodate pedestrians in the numbers generated by the Church use, nor by others who might attend events unrelated to worship. I have no reason to doubt that this situation can, at times, compromise the functionality of the Estate as an industrial area.
27. The Estate is limited in its capacity for vehicle movements, and it appears to me that the Church use generates a level of activity that is harmful to the operation

and overall function of the SIL. The current use of Units 17 and 18 operates to an extent that is not compatible with the intended purpose of the land. I am not satisfied that the Estate represents a suitable location for the Church, particularly in terms of safety for both its congregation and those operating from other units. In this respect I find that the use has a negative impact on the functioning of the Estate and as such there is conflict with Policies D1, D3, D5, E5, GG1, GG2 and GG5 of the LP21 and Policies QD2, QD6, CI2, EC1, EC2 and EC5 of the LLP. The overarching aim of which is to safeguard employment land and support development that does not result in a significant adverse impact on the amenity or operation of neighbouring uses.

Other Matters

28. I acknowledge that both the LP21 and the LLP contain policies that support positive engagement with community groups and respond to the diversity and varied needs of the local population. These policies promote the creation of inclusive, safe, healthy, and sustainable neighbourhoods. However, development must foremost demonstrate an understanding of its site context and, wherever possible, enhance amenity while ensuring that there is no unacceptable adverse impact on users of the development or those likely to be affected by it. In this case, I am not satisfied that the use achieves these objectives.
29. There is substantial support for the Church from its community, and I recognise the important role it plays not only as a place of worship but also as a centre for education and assistance. I have had regard to the representations expressing this support and acknowledge the experience and commitment the Church brings to its community, particularly in addressing deprivation and educational inequality.
30. Support has also been expressed by some businesses within the Estate through a standard letter signed by some occupiers, stating that the Church's activities mostly occur outside normal business hours and therefore dovetail conveniently with existing uses. However, these considerations are not sufficient to outweigh the harm identified or to overcome the conflict with the development plan in respect of the main issues.

Conclusion on ground (a) and the deemed planning application

31. For the reasons given above, the use is contrary to the development plan when read as a whole. There are no material considerations of sufficient weight to indicate that the appeal should be determined other than in accordance with the development plan. I conclude, therefore, that the appeal on ground (a) cannot succeed, and I refuse to grant planning permission on the deemed application.

Ground (g)

32. The appeal on ground (g) is that the period for compliance with the Notice falls short of what is reasonable. I am mindful of the need to strike a balance between enforcement that is intended to be remedial rather than punitive, while maintaining public confidence in the planning system.
33. The appellant has suggested a period of three years to allow them to secure and relocate to suitable new premises of comparable size within the same geographical area, ensuring continuity of provision without causing serious social harm. It is also argued that any alternative accommodation is likely to be in

commercial premises, where obtaining planning permission for a change of use could be challenging.

34. While I appreciate that finding premises that meet all the Church's requirements may be difficult, I am not persuaded that three years would be necessary. Such a period would amount to a temporary planning permission and is therefore entirely excessive. Furthermore, from the presented evidence and clarification of certain matters at the Hearing, it seems that the requirements may be more flexible, and this may well result in fewer premises being dismissed on the basis of size alone.
35. Given the harm caused by the unauthorised use, the compliance period set out in the notice represents a proportionate response to the breach of planning control and is reasonable in the circumstances.

S A Hanson

INSPECTOR

APPEARANCES

For the Appellant

John Collins	Director, DHA
Jack Harley	Associate Director, DHA
Samuel Odaudu	Senior Pastor
Albert Adeboyejo	Associate Pastor/Church Accountant
Sophia Richmond	Young Adult Pastor
Olufemi Oba-Karunwi	Youth/Education Pastor

For the Council

Amauni Campbell	Planning Enforcement Officer (Case Officer)
Eiman Rostami	Planning Enforcement Manager

Interested Parties

Robert Mills	Occupier of neighbouring unit 5 on the Estate
--------------	---

Documents submitted at the Hearing

Photographs provided by Robert Mills

Details of a website and social media post for “GloryRSVP” which markets Unit 18 as an event venue