



# PLANNING BY DESIGN

FROM CONCEPT TO COMPLETION

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## Validation Statement

**401 Old Whitley Wood Lane, Reading RG2 8QA**

**Change of use of the site to a mixed use of community centre and place of worship, including the erection of a Kohinbo Dhee Temple with associated museum and educational provision**

**Prepared by Planning By Design**

**On behalf of Tamu Pye Lhu Sangh**

## Application

This Statement responds to items 4-7 of the Notification of Invalid Application dated 9 December 2025, which request the submission of further technical assessments. It should be read alongside the submitted Planning Statement and approved plans, which already provide a comprehensive description of the proposal, its scale, and its planning context.

The Council has confirmed that, while Local Validation List requirements may apply to minor applications, applicants may demonstrate that certain information is not required where it is not proportionate to the nature of the development. This Statement explains why the requested assessments go beyond what is reasonably necessary to validate this particular proposal.

This Statement explains why, in this instance, the additional information requested is excessive and disproportionate, given the minor scale, established use, and absence of material intensification arising from the proposal. It should be read alongside the submitted Planning Statement, which provides a comprehensive assessment of the proposal against national and local planning policy.

## Summary of the Proposal and Its Scale

The site at 401 Old Whitley Wood Lane is an established community centre with a long planning history of community, educational and institutional uses. The principle of community-related activity is therefore firmly established.

The proposal comprises:

- Retention of the existing community centre building, with internal changes only
- Continued community use (Use Class F2(b))
- Introduction of a place of worship (Use Class F1(f)) – both of which previously fell within Use Class D1
- Erection of a small, freestanding Kohinbo Dhee Temple, located in the north-eastern corner of the site.

The proposed temple is modest in scale, measuring approximately 5.0m by 5.0m in plan, with a limited footprint and height clearly illustrated on the submitted drawings. It is a symbolic and cultural structure rather than a building designed to accommodate large congregations. Worship, gatherings and educational activities will continue to take place primarily within the existing hall, as explained in the Planning Statement.

Critically, the proposal represents a modest evolution of an existing community use, not a new or intensified activity.

## Clarification of the Proposal

For the avoidance of doubt, the proposal comprises three distinct yet complementary elements, which are relevant to each of the technical matters raised:

### Place of Worship

The existing hall will continue to serve as the principal space for worship and community gatherings. There are no external alterations to this building and no increase in its capacity or intensity of use.

### Museum and Educational Provision

A dedicated area within the existing building will be used to display Gurung culture and heritage. This is an internal, ancillary use which does not introduce additional floorspace or operate as a separate visitor attraction.

### Kohinbo Dhee Temple Structure

A separate, freestanding structure is proposed to represent the Gurung temple. This structure is symbolic and cultural in nature, incorporating traditional design elements, lighting and candles. It is not designed to accommodate congregations or regular occupation.

The proposed temple has a footprint of approximately 5m x 5m and a modest height, as shown on the submitted plans, and is small in scale when viewed in the context of the wider site

## Atomic Weapons Establishment (AWE) Impact Assessment

The request for an AWE Impact Assessment is based on the potential for an increase in the number of people using the site. However, when the proposal is considered as a whole, there is no evidence that such an increase would be significant or material.

- The site already functions as a community centre accommodating gatherings and events.
- The proposed place of worship and cultural facilities are integrated into the existing community use, not a separate destination attracting large additional numbers.
- The temple structure itself is not intended to host congregations and does not materially increase occupancy capacity.
- The Planning Statement makes clear that the proposal is a continuation and modest expansion of an established community role, fully aligned with local and national policy.

Against each of the technical matters:

- **Place of Worship:** Worship will continue within the existing hall, which already lawfully accommodates community gatherings. No increase in capacity or frequency of use is proposed.

- **Museum and Educational Provision:** The museum is a small internal display and does not function as a standalone destination or materially increase visitor numbers.
- **Temple Structure:** The temple is not intended for internal congregation and does not increase occupancy of the site.

The site already operates as a community centre, and the proposal represents a modest evolution of an established use, not a new or intensified activity. There is therefore no material increase in population, vulnerability or occupancy that would justify an AWE Impact Assessment at validation stage.

## Noise Assessment

The requirement for a Noise Assessment is not justified by the nature of the development.

- The proposed temple is intended for quiet prayer and cultural reflection.
- The specific religious practices associated with the Gurung community do not involve amplified sound, musical instruments, chanting or hymn singing.
- Existing community centre activities already represent the upper baseline for potential noise generation on the site.
- No new external plant, extended operating hours or noise-generating uses are proposed.

Against each of the technical matters:

- **Place of Worship:** Worship activities will continue in the existing hall and will not involve amplified sound.
- **Museum and Educational Provision:** The museum is a quiet, passive use.
- **Temple Structure:** The temple is symbolic and does not host activities that generate noise.

Importantly, the specific religious practices associated with the Gurung faith do not involve hymn singing, chanting, musical instruments or amplified speech. The proposal does not introduce any new noise-generating use beyond what is already possible under the lawful community centre use. A Noise Assessment would therefore add no meaningful information and is disproportionate.

## Great Crested Newt (GCN)

It is acknowledged that the site lies within a Great Crested Newt Habitat Zone. However, the actual risk of harm must be considered in relation to the specific works proposed.

- The development footprint is very small.
- Groundworks will be localised and limited in extent.
- The site is already managed and developed, with no ponds or habitat features introduced or altered by the proposal.
- The Planning Statement confirms that the development is confined within the curtilage of an established site and does not encroach into sensitive or undeveloped land.

Against each of the technical matters:

- **Place of Worship (a) and Museum/Education (b):** Both are wholly contained within the existing building and involve no ground disturbance.
- **Temple Structure (c):** The structure has a very small footprint, with limited and localised groundworks within an established and managed site.

The development does not introduce new habitat features, water bodies or changes likely to increase risk to protected species. Given the ecological risk associated with the proposal is minimal, the requirement for a standalone GCN statement at validation stage is not proportionate to the scale or nature of the works.

### **Biodiversity Net Gain (BNG)**

The proposal is clearly minor development with a negligible impact on biodiversity.

- The footprint of the temple is extremely limited relative to the overall site area.
- The development does not result in the loss of significant habitat.
- The Planning Statement explains that environmental impacts are modest and that the development is confined to previously used land within an established community site.

While clarification has been requested regarding surface treatment, this does not alter the fundamental position that the proposal does not trigger the need for full BNG calculations or metrics. Requiring such information would be excessive and inconsistent with the scale of development proposed.

### **Overall Proportionality and Validation**

The Local Validation List must be applied in a manner that is reasonable, proportionate and relevant to the proposal. In this case:

- The principle of community and worship use is firmly established.
- The physical development is small and clearly defined.
- There is no material increase in activity levels, noise, ecological impact or risk.
- The submitted Planning Statement already provides a detailed justification of the proposal against national and local planning policy.

Taken together, the additional assessments requested under items 4-7 of the invalid letter go beyond what is necessary to validate a minor application of this nature.

## Conclusion

When the proposal is properly understood; particularly the distinction between activities contained within the existing building and the symbolic nature of the temple structure, it is clear that the development is modest, policy-compliant and low impact.

It is therefore respectfully requested that the Council accepts that the information already submitted is sufficient for validation purposes and proceeds to validate the application accordingly.