



PLANNING BY DESIGN

FROM CONCEPT TO COMPLETION

Planning, Design and Access Statement

Change of use from builder's yard and erection of a detached two storey office building with provision of refuse and cycle stores

At

Land Used For Storage Adj 18 Wandle Road,
Hackbridge SM6 7EQ

Prepared by Planning By Design
On behalf of EDS Consultancy

Introduction

On behalf of our client EDS Consultancy (Applicant), we enclose a planning application for the change of use of the existing builder's yard and erection of a detached two storey office building with provision of refuse and cycle stores at Land used for storage adj 18 Wandle Road, Hackbridge SM6 7EQ.

The application documentation, which has been submitted to Sutton Council as the Local Planning Authority via the Planning Portal comprises the following:

- Completed Application Form and Certificate Notice;
- Flood Risk Assessment and Outline Drainage Strategy (prepared by Brown Fisher Environmental);
- GLAAS Advice (prepared by Historic England);
- Environment Agency Historic Flood Events Data (prepared by Environment Agency);
- Archaeological Desk Based Assessment (prepared by Surrey County Archaeological Unit);
- Transport Statement (prepared by Brown Fisher Environmental);
- Planning, Design and Access Statement (prepared by Planning by Design); and
- Planning Drawings (prepared by Planning by Design).

Site and Surroundings

The application site comprises a building's yard (storage) situated on the eastern side of Wandle Road. The site is adjoined to the south by a pair of semi-detached dwellinghouses at No's 18 and 20, and to the north by a two storey converted block of flats known as 1 to 5 Dale Court. The site has historically been used as a builders yard.

The surrounding area is predominantly residential, and comprises of mainly pairs of semi-detached properties of varying designs, and warehouse units situated further to the north-east.

The application site is not situated within a conservation area, and there are no listed buildings adjoining the site.

The application site is situated in a location with a PTAL rating of 2.

Planning History

There have been four planning applications and one appeal at the site between 2018-2021. All four applications and the appeal were refused/dismissed for a two-storey residential development for design and flood reasons.

The site is located in Flood Zone 3 that restricts development based on vulnerability classifications. Residential developments are "more vulnerable" developments that require certain assessments to justify the acceptability of the proposed development.

The Applicant now proposes a office development at the site, to move their offices to the application site. This development will be a “less vulnerable” development in accordance with the Flood Risk Technical Guidance.

Proposal

Planning permission is sought for a detached two storey office with provision of refuse and cycle stores.

The front of the property will have a semi-permeable paved pathway, with a permeable ramp directly in front of the entrance for disabled access and flood mitigation.

Two secured cycle racks will be incorporated at the front of the site to allow the storage of four bikes, which will be secured to the ground using screw pile anchors. A built-in bin stores will also be included at the front also. The rear garden will be grassed with a border comprising of plants, shrubs and potentially some small trees.

Development Rationale

EDS Consultancy Ltd trading office is currently located in Carshalton, within a mixed-use building comprising of two flats and a single commercial office, all owned by the company and under a single Title Deed. The Applicant would like to relocate their current offices away from this building so that they are able to maximise their mortgage options. This was not a previous concern or issue when the land in Hackbridge was initially purchased as there were many different mortgage products on the market that would have met their needs in the past, but following the changing times, these are not available and so the Applicant needs to adjust their focus and address this situation.

Therefore, the Applicant is proposing the creation of a new office space in Hackbridge that would be a fully commercial building, enabling them to get a fully commercial mortgage for the new premises on much better rates and terms, while making use of an asset the company already currently owns. This has multiple benefits for the company as it would provide them with new revenue opportunities, as their current office can be converted to a flat which would have a better commercial return on this investment, compared with renting it as an office again, while also enabling the cost savings of being able to renew the mortgage on a better and more favourable rate. With the Land, the Applicant will be able to use it for themselves to have a comfortable, new high-tech, purpose-built office space with private outside amenity space that they currently do not have to use during coffee breaks and lunchtime, as well as providing a nice outlook for the working environment.

The new location for the proposed company trading office is close to all employees, with a maximum time of 30-minute drive, or 40-minute commute via public transport or a 30-minute cycle, with most employees being closer with an approximately 10-minute drive, or 30-minute commute via public transport or 15-minute cycle away, making cycling a significantly viable option for commuting.

Furthermore, the site location is in a great area that is quiet, making it suitable for their office needs, and provides private outside amenity space for staff to enjoy and utilise whilst being close to local amenities such as Beddington Park for larger outdoor space including walks and recreation during socialising, free time or lunch breaks. There are also shops located very close by which can be easily reached by all staff and occupiers of the building making it a very attractive space and a good use of an existing company asset.

Developing the land for an office space for their use would be beneficial to the company in the following ways:

- It will aid the restrictions on the mortgage for the current office helping the Applicant make savings.
- The Applicant can build a purpose-built office, tailored to their needs in a very nice location with amenities that they do not currently have such as private outdoor amenity space while utilising an asset the company already owns.

Planning Policy

National Planning Policy Framework (2024)

National planning guidance, which is a material planning consideration, is largely detailed within the National Planning Policy Framework (NPPF). For decision making, the NPPF advises that local planning authorities should look to approve sustainable development proposals that accord with an up-to-date development plan without delay.

Sutton Development Plan

The adopted development plan comprises:

- London Plan (2021)
- Local Plan (2018)
- Policies Map

The site is designated within the Local Plan as falling within the Hackbridge Area of Potential Intensification (API), and Archaeological Priority Area, Area at Risk of flooding, Decentralised Energy Opportunity Area and the Hackbridge and Beddington Corner Neighbourhood Area.

Planning Considerations

Principle of Development

The NPPF requires the Council to make the most efficient use of land by maximising the reuse of previously developed land. The site is used as a builder's yard, which deems the site as industrial land under a B8 or Sui Generis use. The Local Plan designates the site as part of an API. The proposed office use aligns with objectives to intensify land use for employment while maintaining the character of the area. We consider there is scope to accept office development under Policy 16 of the Local Plan at the site, as the Council encourage making the most efficient use of land by maximising the reuse of previously developed land, and commercial use will be retained on the land as historically used.

Although previously developed, there is currently no building on the land and an office building could fit in with the character of the area (predominately residential) as there would be limited harm to the amenity of the surrounding area.

The NPPF (2024) emphasises sustainable development, efficient land use, and promoting economic activity while minimising environmental risks. The proposed development aligns with the following key NPPF principles:

- **Efficient Land Use:** As previously developed land (builder's yard), the site complies with NPPF's "brownfield first" approach. Paragraph 120 of the NPPF encourages the development of underutilised land and sites, ensuring sustainable urban development.
- **Employment and Economic Growth:** Paragraph 81 highlights the need for planning to create the conditions in which businesses can invest and grow. The proposal supports local employment and provides purpose-built infrastructure for a local business.
- **Flood Risk Mitigation:** The development incorporates resilient construction techniques and elevated floor levels to mitigate flood risks. As per Paragraphs 161-167, the NPPF permits development in flood-prone areas if risks are managed effectively, particularly when classified as "less vulnerable."
- **Transport and Accessibility:** Paragraph 110 advocates for developments that prioritise sustainable transport modes. Despite a PTAL of 2, the site's proximity to Hackbridge station and local bus services supports commuting by public transport, cycling, and walking, reducing dependency on cars.

The proposal is small-scale that does not raise any significant policy issues, and the development will not disrupt the character or amenity on Wandle Road and neighbouring properties. For the above reasons, the principle of development should be accepted.

Flood Risk

Although the site is within zone 3, an office development would be considered a "less vulnerable" development. This demonstrates that Class E uses could be acceptable at the site with other uses being similar, "more vulnerable" development types that were accepted by the Council including the New Mill Quarter for 725 homes which was also within the flood zone (refs. C2009/62175 and DM2020/00285). The Council should implement consistent ruling for acceptable developments in the area, particularly in similar flood zones.

There are no records of flooding in this area. Nevertheless, to mitigate potential risk, the set finished floor level (FFL) will be 300mm above the maximum modelled floor level. The FFL will therefore be a minimum of 27.61m AOD or 150mm above existing ground level, whichever is higher.

To further mitigate the risk of flooding water, resilient construction techniques will be used at ground floor level and the occupiers will sign up to the Environment Agency flooding early warning system.

Significant evidence to support the Flood Risk Assessment's conclusions are enclosed in this application. Nevertheless, the proposed use is classified a "less vulnerable" development in accordance with the Flood Risk Technical Guidance (2012). Although these types of development are not considered appropriate uses in its zone, there is no policy or text that says these development should not be allowed. In practice, Wandle Road is filled with built development; of uses that are more vulnerable to flooding than the proposed office development.

Two additional separate dwellings was approved in recent years at 63 Wandle Road. The development is sited opposite the application site (over the road); at a lower elevation; and closer to the River Wandle which is a major flood risk area. When compared with this application, the proposed development further away and proposes a less vulnerable development. There was a major development at New Mill Quarter that was approved and is underway which is also in Flood Zone 3 and would be for a 'more vulnerable' development.

For more information on Flood Risk, please see the Flood Risk Assessment and Outline Drainage Strategy.

Neighbouring Amenity

Policy 29 of Sutton's Local Plan states that the Council will not grant planning permission for development if it adversely affects the amenities of future occupiers or those currently occupying adjoining or nearby properties, or has an unacceptable impact on the residents of the surrounding area. As such, in assessing the impact of a proposed development, the Council will take into consideration the impact on privacy, sunlight or daylight, noise and disturbance, sense of enclosure and outlook, together with effects on microclimate, odour, smoke fumes and dust.

The Design of Residential Extensions SPD (SPD4) sets out that due consideration should be given to the siting of developments, especially in tightly constrained plots, as unsympathetic developments can result in a significant loss of light and outlook to nearby residential properties, or can result in a loss of privacy to nearby residential properties. Whilst SPD4 generally relates to proposals for residential extensions, it provides a useful set of guidelines against which other forms of residential development can be assessed, and it sets out that developments should not result in a significant loss of privacy to main habitable rooms of nearby properties or gardens or patio areas.

The closest residential properties to the application are 18 Wandle Road to the south and 1-5 Dale Court, 16 Wandle Road to the north (specifically Nos. 2, 4 and 5).

Nos 23 and 24 Greenacre Place are positioned to the rear of the application site. The rear building line of the proposal will achieve an appropriately distance to the rear building lines of those properties. As such, it is considered that the proposal will not have an adverse impact on the occupiers of that building, through loss of light, outlook and privacy.

The building is of a similar height to the neighbouring building to demonstrate appropriate prevailing building heights along the road. The building will not result in overbearing or overshadowing impacts. The proposed development will not result in unacceptable environmental impacts that will be harmful to the amenity of surrounding occupiers. The proposed use will be a traditional office space, with conventional office hours, so noise would only relate to working hours, which for a conventional office (desk-based) would be minor when compared with neighbouring residential uses.

The nature of an office development creates limited noise during operation hours (weekdays) and none when closed (evenings and weekends). The nature of the development will benefit the noise amenity of the neighbouring properties. Compared with the neighbouring development, noise levels will be a negligible impact.

Highways and Access

The proposed building will not disrupt the functioning of the local highway network. The volume of traffic associated with the proposed office use will not be significantly pronounced.

The London and Local Plans support new development that avoids excessive car parking provision that can undermine cycling, walking and public transport use. In addition, cycling and walking is encouraged over other less sustainable modes of transport.

Policy 36 of the Local Plan sets out that development proposals should be located so as to minimise any adverse impact on the highway network and maximise the use of sustainable modes of transport. Policy 37 states that new developments should provide the appropriate amount of car parking in accordance with the Council's restraint based, maximum car parking standards, taking into account Public Transport Accessibility Levels (PTALs), existing publicly available parking provision and usage in the vicinity of the site, and the need to deter unnecessary car use while avoiding overspill parking problems.

The application site is situated in a location with a PTAL rating of 2, indicative of a 'poor' level of public transport provision. However, the rating is not representative of the transport services in the area, as based on a traffic survey of the area, the findings indicate there are good links to Central London, large town centres such as Croydon and smaller town centres such as Hackbridge and Wallington. There are also links to major transport hubs such as Clapham Junction.

These links include buses, as the adjacent A237 is served by the 151 service which is a high frequency service running from Worcester Park to Wallington via Sutton and Hackbridge. The bus stops for either direction are located on A237 approximately 155-160m from the site and further linking services can be accessed a short distance to the south where the A237 meets the A232 (approximately 815m South) allowing easy, regular access to Croydon and Carshalton.

Railway services can be accessed via Hackbridge Railway Station which lies approximately 333m to the north in the local town centre with Southern Trains running regular services to London St Pancras/Victoria, as well as Epsom, Sutton, Elephant & Castle, London Blackfriars, Mitcham Junction Balham, Clapham Junction and St Albans amongst others. The site's location offers a wide network of destinations that support a sustainable area in practice, (regardless of its PTAL rating).

Under the Council's parking controls (Parking Permit Area PPA, HB1) that have been implemented in the immediate area, the concept of the proposed car free development (without off street parking) should be accepted. This was also accepted with previous applications at the site.

Trees and Biodiversity

Policy 28 of the Local Plan states that the Council will grant planning permission for developments that make a positive contribution to the street frontage, streetscene and or public realm, such as using railings and low walls where appropriate and responds to natural features and retains trees, hedges and other landscape features and spaces of amenity value, where possible.

Policy 28 O(v) of the Local Plan states the Council will require compliance with latest arboricultural standards in respect of any tree works or development near trees.

Policy EP3 of the Hackbridge and Beddington Corner Neighbourhood Plan states that development should protect trees in good health that add to the quality and character of the area.

In comparison with refused applications DM2020/00285 and DM2021/01742, this scheme follows a similar building line and type, with no dropped kerb proposed. The more recent applications for residential use including now Flat 5, Dale Court (ref. DM2019/00616) were deemed acceptable with this respect and the layout of this proposal is designed with the intention of the setting back of the corner nearest the tree to reduce and avoid negative impact and any pressures to carry out work on the tree (Ginko). The proposed piled foundations will minimise and avoid issues within damaging the Ginko tree roots.

The Ginko tree is planned to be preserved and protected as it provides a great aesthetic, preservation of the streetscape and improved amenity value to the site overall, and would not be appropriate to remove.

Conclusion

The proposed development represents a sustainable and policy-compliant reuse of underutilised land, delivering economic, social, and environmental benefits. The proposed office use will make efficient use of the land, and provide a "less vulnerable" development that can complete the character of the Wandle Road, which is currently a builder's yard that breaks the street pattern. To refuse the application would go against all recent development in the area that falls within the same flood designation, and more vulnerable development classifications.

The property will follow the design and character and neighbouring properties; that of a conventional residential dwelling, to remain in keeping with the residential aesthetic of the area and have no detrimental impact on its usage as an office space. The use and associated activity, including comings and goings of employees will unlikely cause a greater level of disturbance or amenity harm than could be expected by other commercial uses in neighbouring residential properties. It is considered that a non-harmful material change of use would occur at the site.

The proposed development should be acceptable in principle, the standard and quality of environment for occupiers (Applicant) will not result in harm to the area's visual amenity or residential amenity, nor the functioning of local highways network. We respectfully request that the Council supports this application.